Audit Report

Global Standard for Food Safety Issue 8: August 2018

1.Audit Summary			
Company name	Taste Tech Ltd	Site Code	1857920
Site name			
Scope of audit	The manufacture (including encapsulation, fluidisation, blending and drying) of encapsulated spray dried and liquid food flavourings and ingredients.		
Exclusions from scope	None		
Justification for exclusion	Justification for exclusion		
Audit Finish Date	2020-11-11	Re-audit due date	2021-11-13
Head Office	No		

Additional modules included			
Modules	Result	Scope	Exclusions from scope
Choose a module	Choose an item		
Choose a module	Choose an item		

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Announced
Previous audit grade	AA	Previous audit date	2019-11-05		
Certificate issue date	2020-12-17	Certificate expiry date	2021-12-19		

Number of non-conformities		
	Fundamental	0
	Critical	0
	Major	0
	Minor	0

3.Company Details

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Address	Units 3-6 Wilverley Industrial Estate, 813-815 Bath Road, Brislington BS4 5NL		
Country	England	Site Telephone Number	01179712719
Commercial representative Name	Tessa Murphy	Email	Tess.murphy@tastetech.com
Technical representative Name	Naval Mistry	Email	Naval.mistry@tastetech.com

4.Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3

Shift Pattern	08:00 – 17:00, Mon - Friday
Subcontracted processes	No
Other certificates held	Organic, Kosher, RSPO and Halal
Regions exported to	Asia North America South America Europe Oceania Choose a region
Company registration number	NA
Major changes since last BRCGS audit	None

Company Description

Privately owned company, founded in 1992, originally in 1 unit. The site is now located in 6 units within the same industrial estate. The site produces around 900 tonnes per year of encapsulated dried and liquid food products, (including the technologies of fluidisation, blending and spray drying) and ingredients flavours and ingredients for further processors, with no retail consumer products. There are approximately 65 staff in total, 10 of whom are in production, single shift from 08:00 to 17:00, 5 days per week, with extended days operating when production volumes require. The company has seen substantial growth over the past 6 years

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5.Product Characteristics

Product categories	15 - Dried food and ingredients Category Category Category				
Finished product safety rationale	Ambient stable products. Powders: low moisture (8%), with 6 to 24 months shelf life. Liquids: >15% ABV or propylene glycol, 6 months shelf life. Encapsulated oils: ambient stable, 6 months shelf life.				
High care	No	High risk	No	Ambient high care	No
Justification for area	BRCGS decision tree used – ambient stable, does not support pathogen growth, therefore low risk and enclosed product areas only.				
Allergens handled on site	None Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen				
Product claims made e.g. IP, organic	Halal, RSPO, Kosher. (Organic certification is in place but not currently claimed.				
Product recalls in last 12 Months	No				
Products in production at the time of the audit	Custard Flavouring 205897, Chocolate Flavouring 207738, Fresh Orange Flavouring 204696, Sorbic Plus 203754.				

6.Audit Duration Details

On-site duration	16 man hours	Duration of production facility inspection	6 man hours
Reasons for deviation from typical or expected audit duration	The BRCGS audit was shorter than the expected duration, and the production facility inspection was less than 50% of the audit, because it is an enclosed process and no more than 2 lines were running across the 2 days.		
Next audit type selected	Announced		

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Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1	2020-11-10	09:00	17:45
2	2020-11-11	08:00	15:30

	Auditor (s) number	Name	Role
Auditor Number	135014	Stewart Bressington	Lead Auditor
Second Auditor Number	N/A		Please select

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Janis Sinton – Managing Director	X			X
Naval Mistry – Technical Services Manager	X		X	X
Jason Ticktum – Head of Manufacturing Strategy	X	X		X
Tessa Murphy – Commercial Manager	X		X	
Nicola Doudney – Q.A. Food Technologist	X		X	X

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced

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Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements				
No.	Requirement ref.	Details of non-conformity	Critical or Major?	Anticipated re-audit date

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date

Major							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Minor							
No.	Require-ment ref.	Details of non-conformity	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Comments on non-conformities

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Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date

Major							
No.	Requirement ref.	Details of non-conformity	Corrective action taken	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No.	Requirement ref.	Details of non-conformity	Corrective action taken	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

There is a documented food safety, legality, quality and authenticity policy signed by Janis Sinton and dated 14.10.20 which is displayed in reception, with an additional copy on Breath (HR tool used by staff), and in canteen. It is also included in the induction information given to all new employees.

The company demonstrated its commitment to the Standard based on the level of on-site managerial resource, staff training and financial investment sufficient to produce safe, legal, authentic and quality food.

COVID-19 has had no real impact; production has continued, and the company has looked at contingencies if a few staff are off due to COVID-19. Technical were available to get to site if required, and Head of Manufacturing Strategy was present at site throughout the lockdown.

The areas covered by this section were discussed with RS, Commercial Director, during the audit.

A plan for the development and continuing improvement of a food safety and quality culture plan is in place, ver. 4.
The following activities are included in this plan: Look at Incentives / Disincentives, Communications with all staff, Food Safety Training in a classroom environment, review of all outcomes. Performance reviews are now written by the employee rather than the employer, covering what they want from the company. The effectiveness of these activities is reviewed annually, with the last review in July 20.

Seen for: screens around the site including a large electronic screen in the canteen with each department having slots to put information on the scrolling screen, and posters emphasising the importance of washing hands.

Clear objectives/targets are established by the company which are specific, measurable and achievable and these are:
- Improve food safety and quality: visibility
- Communicate NCR and other technical issues to production and senior management teams, every 6 weeks, using internal NCRs, seen for 30.10.19
– To monitor and improve customer complaint levels, reported every 6 weeks. Target <1 in 750,000 (currently running 0.8)

These are monitored and reported on 6 weekly to senior management and reviewed at the Management Review meetings held annually and attended by: JS, GG, TM, JT, PS

Management Review meeting agendas include all elements of 1.1.4. Minutes were reviewed for the meeting held on 06.11.20. The output of the meeting included: no major changes, apart from a change in working patterns due to COVID-19, complaints and non-conformance levels are on target.

Due to Covid-19 extra senior management meetings were held at the start of lockdown to discuss impact of COVID-19 on the company; these have been reduced in length depending on the current situation. Most meetings across the business have moved to remote on-line meetings.

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In addition to the senior management reviews, technical meetings are held to go through customer complaints and NCs, internal and external audits, preventative and corrective actions, supplier approvals, risk assessments, training. TACCP/VACCP meetings are held monthly, HACCP meeting is held quarterly with an annual review, in order to bring food safety, legality, integrity and quality issues to the attention of senior management.

Other meetings held include two full annual reviews of TACCP and VACCP.

Employees are aware that evidence of unsafe or out of specification raw materials or products must be reported to senior operative or the Head of Manufacturing Strategy so that anything requiring immediate attention can be dealt with, as confirmed in interview with N.M. spray drier operative.

There is a confidential reporting system in place "Whistle Blowing Procedure pol 19, iss 1, 08.10.19", covered as part of induction and also available on Breathe (internal on-line service), which enables staff to report concerns relating to product safety, integrity, quality and legality. The policy is issued on Breathe with email prompts to staff to read the policy, seen by L.E on 17.10.19.
The method of reporting concerns is communicated to staff by using the phone number detailed on the policy, with the reports feeding through the account controller to provide impartiality.
Senior management assess any concerns raised by the account controller relating to the senior team. This assessment, and any actions taken, are documented on "Whistleblowing Process Flow Procedure PRM24, iss 1, 08.10.19; there have been no to date.

The site is kept informed of the points listed in 1.1.8 by membership of UK Flavours Association, Food Additive and Ingredient Association, members of Camden BRI, RASFF and FSA alerts. These are reviewed by Technical Services Manager, Head of Technical and senior flavourist who would circulate relevant information to the wider business.

The 3 non-conformities raised at last year's audit have been resolved and there was evidence that root cause has been identified and actions instigated to prevent recurrence.

The site uses the BRC Global Standards on stationery, but not on products or packaging.

1.2 Organisational structure, responsibilities and management authority

There is an established and experienced team of managers based on site, which includes: JS – MD, GG – Head of Technical Strategy, TM – Commercial Manager, JT – Head of Manufacturing Strategy, PH of Innovation Strategy, NM – Technical Services Manager. An organogram is in place QMF98, iss 48, 01.11.20. Deputies for key staff are defined in QMF57 "Succession Chart, iss 16, 28.10.20".

Job descriptions and work instructions are documented for all personnel and processes to communicate duties and responsibilities.

The following work instructions were challenged during the audit and found to be operational and relevant: Blade Control Procedure PRW59, iss 2, 16.09.20" and "Goods in Inspection PRW8, iss 9, 04.02.20".

Job descriptions were challenged for the following roles: Electrical Maintenance Engineer, and QC Lead.

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Details of non-applicable clauses with justification	
Clause/Section reference	**Justification**

2 The Food Safety Plan – HACCP

The company's food safety plan is based on Codex Alimentarius HACCP principles. There are essentially 3 HACCP studies: spray drying, liquids and dry powders, dated 06.11.20.

The HACCP team is led by ND who is competent in HACCP by Campden training on 11/02/13, with refresher in 2015 and another HACCP refresher at Campden 22 Oct 2020 and who has 16 years' experience in the industry.
There are 6 other HACCP team representatives from R&D, technical, factory management, maintenance and buying, and all are trained to minimum Level 2 HACCP.

The scope of the study includes receipt and handling, processing, storage and despatch and covers all the products produced at the site. It is systematic, comprehensive and fully implemented and maintained.

A comprehensive pre-requisite programme is in place covering all areas of operation such as personal hygiene, transport, allergens, pest control, foreign body controls, site/waste management, supplier approval/monitoring, hygiene and housekeeping, allergens, product formulation, site security, metal control.

There are no pre-requisites used to manage specific hazards.

General pre-requisites, such as pest control and general cleaning are validated through the use of industry best practice, scientific information, etc.

Product descriptions are defined in section 2.3.1 of the HACCP as: Encapsulated Food Additives, Food Flavourings, Encapsulated Food Ingredients.

References to legislation have been made within the study including, appendix 2: Contaminants in Food England Regulations 2013/2196, Food Irradiation Provisions England Regulations 2000/2254, Materials and Articles in Contact with Food England Regulations 2012

Intended use is documented as: All B to B, no retail sales, all products are used as ingredients in the bakery, confectionery and beverages industry.

There are 7 flow process diagrams, last verified by the team on 02.11.20.
The process flow diagrams cover the process steps, which include, as appropriate, raw material receipt, raw material storage, ingredient assembly/weighing, encapsulates melted/carrier dissolved, flavourings added, spray atomisation, powder collection, sieving, packing, finished goods storage, and despatch.

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Physical, chemical, radiological, microbiological, fraud, malicious contamination and allergen hazards have been considered within the study "Food Safety Plan QM02, iss 17, 06.11.20, with additional appendix 3 which specifically covers the issues addressed in the Food Safety Plan such as fraud and Chemical and Radiological contamination. Allergen hazards considered include raw material and supply chain risks, and risks from visitors/workers.

Hazard analysis and CCP identification has been based on a likelihood (5) x severity (5) basis and the use of a 4-question decision tree. The following CCP has been identified and critical limits defined:

CCP1- Sieving
Critical Limit: dependent on product but typically 630 microns, CRM300 line 2000 microns; recorded by: line operatives before and after each batch; recorded on: Mestec.

A corrective action procedure is in place. Responsibilities for monitoring the critical limits and for corrective action are defined. QC check all recorded parameters before each batch can be released, recorded on QMF12a, QC also do a monthly competency check of the operatives.

Validation of the critical limits has been based on industry standards.

Verification is carried out during internal audits and the daily verification checks performed. Verification reviews are carried out monthly and are based on a review of the system documentation, records, internal audits, deviations and corrective actions, complaints and incidents.

The HACCP plan and pre-requisite programmes are reviewed at least annually (last 02.11.20), when relevant changes occur, such as processing changes or emergence of new risk, or if a recall occurs.

As a result of recent reviews, no changes were made to the company's product safety policy and food safety objectives.

Details of non-applicable clauses with justification

Clause/section reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

The Quality Manual 22.10.2019 v18 has been written to meet the requirements of the Standard and contains policies, procedures, work instructions and record forms. It is controlled electronically by NM. The contents are communicated to key staff using Breathe and Technical meetings and tool-box talks.

Department specific work instructions are available at key locations and all documents are in English; there are no additional language requirements.

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3.2 Document Control

Controlled documents are listed on “Master Document Register QMF70, iss 1, 13.01.09”, and “Work Instruction Register QMF33, iss 3, 10.11.14” and control is managed by “Document & Record Control Procedure PRM01, iss 11, 14.08.19” procedure.

N.M. and N.D. and I.P, (QA admin) are responsible for authorisation, changes/amendments and replacement of existing documents.

Electronic documents are stored securely on Sharepoint, with access controlled through read and write control, and are backed up to a cloud server by Chorus.

3.3 Record completion and maintenance

Records are completed manually and electronically and are stored as hard copy and electronically and backed up to a cloud data centre. All records are held within SAP which is also backed up by SAP.

Records reviewed during the audit included “Dispatch Checklist QMF35, iss 14, 18.07.18”and “New Equipment Commissioning Procedure QMF109, iss 4, 28.09.17” completed 16.04.20, and were seen to be legible and genuine and were easily retrieved.

Records are retained for 3 years (longest shelf life of product is 24 months).

3.4 Internal audits

There are 9 trained internal auditors who are responsible for the site internal audits. The auditors are all based on site and come from Technical, QC, Purchasing, R&D and Accounts. The auditors cross audit departments to ensure independence from direct responsibility.
Examples of training: NM – Advanced Food Safety 30 Nov 16, ND – Advanced Food Safety 30 Nov 16, S O and LM received internal auditor training on 24.01.2018.

The internal audit schedule is documented and covers all the documentation and processing systems on site. Each area is audited at least annually. Internal audits are carried out throughout the year with the frequency determined by risk assessment.

Due to the impact of Covid-19, and the number of staff able to be on site, there has been some impact on the company’s ability to complete the internal audits to schedule. This has led to some being pushed back 1 or 2 months - internal NC 01 on 16.07.20 was raised as a consequence.

Internal audit records reviewed, recorded on QMF05, iss 4, 19.09.12, included – Specifications by SO on 28.04.2020, and Site Security by LM on 08.09.20 and were comprehensive recording both conformity and non-conformity and objective evidence for the findings.

Corrective actions and their timescales had been agreed and completion had been verified by the Auditor or Technical team on the Audit Non-conformance Note.

In addition, monthly hygiene/fabrication and GMP inspections are carried out, based on risk assessment. Reports reviewed included: Hygiene and Fabric on 23.07.20 & 25.08.20 (recorded on QMF49), and glass and hard plastic audits reviewed for 15.07.20 and 12.08.20.

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3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

A risk assessment of raw materials and primary packaging has been carried out, with products assessed for allergen, foreign body, chemical, microbiological and substitution/fraud risks (covered on the Vulnerability assessment).

The ingredients have been split into different groups, e.g. flavouring, natural flavourings, essential oils. Reviewed for Fats & Oils, last review date 30.10.19, Natural Flavourings last reviewed 30.10.19. The risk rating is likelihood v severity where a score of 15+ would be considered high risk. All ingredients are assessed as low-medium risk.

There are no hazards associated with raw materials.

There are no variety/species cross contamination risks.

Suppliers of all raw materials and primary packaging are approved and monitored by ND using "Purchasing Procedure PRM06, iss 19, 09.11.20" and assessment of suppliers is based on risk, quality and historical compliance.

The risk assessment is used to grade suppliers as low, medium or high risk.

Most suppliers have been assessed as low risk, with 7 assessed as medium risk because they are new suppliers so don't have historical compliance. They are reviewed after 6 months.

If there is reason, such as a non-compliance, or the site does not have GFSI certification, suppliers may be audited by ND or NM who are both qualified auditors. There had been no audits in 2020 - last one was at PA on 19.06.19.

Medium risk suppliers are required to hold valid BRCGS/GFSI benchmarked certification with a scope which covers the raw materials or primary packaging supplied to the site.

The following BRCGS certificates were checked during the audit via the BRCGS database and found to be genuine and valid.
FDC – BRCGS grade AA, exp 22.12.20
AAKI – BRCGS grade A+, exp 31.12.20

The following supplier audit reports were checked and found to be comprehensive:
PA for flavourings, essential oils, audited on 19.06.19.

The following SAQs were reviewed and found to cover all the requirements:
DMA – completed 02.10.20; covers product specification, food safety & quality management including CCPs, GMO statements. Internal audits, positive release, traceability and recall, site standards, FB detection, allergens. Thew Arnott completed on 27.08.19.

There is a documented, risk-based process for the on-going review of supplier performance, with the performance criteria defined using the Supplier Risk Assessment table QMF168, which takes into account food safety complaints, volumes purchased, impact on Taste Tech.

An approved supplier list QMF26 is in place. Relevant information from the list is made available to

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purchasing and intake staff, accessed suing SAP and hard copy is provided by Technical.

Agents, brokers and wholesalers are used;
The agent/broker/wholesaler has GFSI certification, e.g. A UK Ltd – BRCGS Agents & Brokers exp 22.04.21. Although Agents & Brokers may be used Taste Tech alwaysknow the identity of the manufacturer and hold their GFSI certification, one such manufacturer would be S.A.C.B. N.V. FSSC 22000, exp 28.12.22.

Suppliers' traceability procedures are either assessed by GFSI certification, or where supplier approval is done via a questionnaire, traceability procedures are assessed by requesting a traceability, example seen for AC, done on Vanillin 10.09.20.

Exceptions are covered by Exceptions Procedure OPR/02/29.03.17; all material must be tested through QC on a different code number. If it passes it's transferred to the raw material code number.

Summary of contingency plans including contingency supply of raw materials following the COVID-19 emergency: the same contingency for COVID-19 as used for Brexit - dual supplies for most of the raw materials, all suppliers have been contacted and confirmed they have built stocks where possible and will keep Taste Tech informed if they encounter any supplyissues. Over the last 6 months there have not been any supply chain issues.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Raw materials and primary packaging are checked on intake for compliance with purchase orders and certificates of analysis, certificates of conformance for packaging, are received.

Product specifications are held by QC who have access on the computer terminals and in hardcopy files.

All specifications are held on SAP which the QC team refer to - only products that have been approved are listed so any updates are understood. Procedure "Receipt of Raw Materials QAW36" ensures that any approved changes to raw materials or primary packaging are communicated to intake staff.

3.5.3 Management of suppliers of services

"Purchasing Procedure PRM06 iss 19 09.11.20", point 4.1.1. covers requirements for use of suppliers of services, which includes obtaining relevant accreditation/certification, and considers historical performance.

The following supplier contracts were viewed: Laundry with Apparelmaster Ltd, Pest control with Rokill, Haulage with Prompt.

3.5.4 Management of Out sourced processing

None

3.6 Specifications

Supplier raw material and primary packaging specifications are sufficiently detailed and are held on Sharepoint.

Reviewed for: Disodium diphosphate E450, Akoflake PO5/MB Palm Oil, Sodium Bicarbonate. Packaging;

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Blue Polythene sack from Flexipol.

Finished product specifications are generated by the site and are supplied to customers on site format, seen for “Baking Powder T3475, iss 9, 05.08.19” and “Sorbic Plus 150GMC, iss. 5, 05.08.19”, and found to be sufficiently detailed and compliant.

Specifications are reviewed minimum 3 yearly, or where changes occur, documented on the specification., and in Sharepoint Finished Goods Specification register.

3.7 Corrective and preventive actions

“Corrective and Preventative Action Procedure PRM10, iss 7, 23.10.18” is in place to address failures identified in the food safety and quality management system. Non-conformities that result in a risk to product safety, legality or quality are investigated and recorded in line with clause requirements.

This includes the assessment of the consequences of the non-conformity, and verification, by the Technical Services Manager.

Root cause analysis, and further corrective action to address the root cause, are carried out, where this is necessary. The site uses 5 whys principle to assess root cause. For example, wrong batch code on the label, date raised 20.08.20 and closed on the 01.10.20 by the Technical Services Manager.

Corrective actions taken are recorded and discussed during the monthly management meetings

3.8 Control of non-conforming product

“Control of Non-Conforming Products Procedure PRM09, iss 13, 23.04.20” - Non-conforming products are identified by the QC using QC Quarantine stickers and are also locked within SAP. The Technical department is informed and are responsible for the holding and release of products.

All incidents of non-conforming product are recorded on: “Non-Conformance Log QMF87, iss 4, 10.10.14”, which details the investigation, analysis and cause of any non-conforming product. Defined responsibility and actions/timescales are documented. Reviewed for Non-Conformance Report RM20-03 for wood being found in bag of salt, dated 03.02.20; investigation revealed a pallet had been placed on top, signed off on 24.02.20.

3.9 Traceability

A documented traceability system is in place “Completing Traceability Guide Procedure PRM23, iss 1, 25.05.19”.

A recording system is in place with all raw materials, in process materials, packaging and finished product coded to allow for full traceability through the system.

The traceability system is manual and computerised in SAP and operates on a batch system with a unique batch code assigned. When processed a new lot number is generated within SAP for the finished product label.
Rework is limited to re-blending into a new batch and traceability is maintained by maintaining the original assigned lot number.

The site carries out traceability and mass balance tests at least annually and these were undertaken as follows:

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Forwards on 14.10.20 on raw material R001 (rapeseed oil, RSPO and Kosher) code 526153, full traceability was achieved in 2hrs, mass balance was also achieved.

Backwards on 06.10.20 on finished product 204695 (Natural Orange Flavouring, Halal). Full traceability was achieved in 2 hrs 5 mins.

A traceability challenge was undertaken during the audit on: CR100 Baking Powder T3475, lot 531454. Traceability was achieved in 2 hrs 15 mins. The ingredients: SO28 (Sodium Pyrophosphate) on 27.07.20, and 53085 (Sodium Bicarbonate) which is made up of palm fat on 09.07.20 and sodium bicarbonate on 12.06.20 were traced to delivery and supplier detail.
A mass balance exercise was carried out on: Sodium Pyrophosphate, 2000 kg delivered on 27.07.20, all used in production over 12 runs.
Contact packaging – Sack Blue LDPE, internal batch 527511, delivered by Flexipol on 27.11.19.

3.10 Complaint-handling

A system of complaint handling is implemented via "Corrective and Preventative action PRM10, iss 7, 23.10.18". All complaints are logged and investigated by the Technical Service Manager with full details kept of all actions taken.

Complaint target is set at 1 per £750,000, with the current level at 0.9. Complaints are trended by product and type and reviewed at monthly meetings.

Analysis of complaints viewed for the past 12 months indicate that the level of complaints is running below target.

Serious complaints, or significant increases in complaints, are investigated using root cause analysis – 5 Whys – seen completed for wrong batch code on the label, date raised 20.08.20 and closed on the 01.10.20 by the Technical Services Manager.

Some examples of complaint types - damaged bags, label, lumpy product, product performance, foreign body.

3.11 Management of incidents, product withdrawal and product recall

The company has comprehensive procedures: "Business Continuity Plan, PRM 15 rev 7 dated 29.10.20" and "Product Withdrawal & Recall Procedure, PRM13 rev 19 20.04.20", and an out of hours contact list for all key members of staff, customers and organisations including the BRCGS and organic certification bodies is an appendix to PRM15. The requirement to notify the Certification Body within three days of the decision to issue a recall is included.

There has been no product recall.

In response to COVID-19 the site emergency response plan was discussed at senior management meetings and any changes were communicated to all relevant staff.
Traceability batch information is electronic - the traceability was tested remotely to check that product recall could be completed effectively while teams were working through lockdown, and it was determined that no further action was required
A recall challenge is undertaken by the company with the product traced to the customer. The last challenge was undertaken on Sorbic Acid with taint on 24.09.20, started at 10.30 and finished 13.15. The results of the audit are reviewed and discussed at the Technical Meeting, seen dated 06.11.20.

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Details of non-applicable clauses with justification	
Clause/section reference	**Justification**
3.5.2.3	No live animals to site.
3.5.4	No outsourced processing

4. Site standards

4.1 External standards

The site occupies approximately 2880 metres square and production and storage buildings occupy 1968 metres square.
The site is approximately 50 years old.

The buildings are in good repair and well maintained. The external areas are suitably constructed for traffic routes and are maintained in a clean and tidy condition.

There are no local activities having an impact on the site operations with an adjacent welding facility and automotive sales in the area. There are no potential risks associated with the site that may affect product safety or integrity

4.2 Site security and food defence

A documented risk/threat assessment is in place “Food Defence Plan QM03, iss 2, 24.10.20”, which considers both internal and external threats and risks from deliberate contamination or damage.

As a result of this, a threat assessment plan “Risk Assessment of Identified Threats QMF172, iss 3, 04.10.19” has been generated. This is reviewed at least annually and whenever a new risk/threat emerges or there is a product security/defence incident, although this year there have 2 minuted meetings on 01.07.20 and 05.10.20 with actions to have improved background checks of new starters.

No raw materials or products have been identified as being at particular risk while on the site.

No areas of the site are considered to be at significant risk.

The site is on a light industrial and retail park, and while it is gated the landlord does not permit it to be locked. All doors are locked with controlled entry, with the exception of the reception area, which is manned. Entry beyond reception is access controlled. There are CCTV Cameras and the building is alarmed direct to police and company representative.
Entry doors to production are fitted with key fob systems.

There is reporting system for all visitors and contractors.

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Staff training is in place on site security and food defence, seen for N.M. on 06.10.19.

In response to COVID-19 the number of staff on site have been reduced, and restricted access to certain areas within the site has been implemented. Screening of visitors before entering site has been introduced, with temperature checks.

4.3 Layout, product flow and segregation

There is a site map, dated 08.10.20 which includes all the points referred to in clause 4.3.1.

There are no high risk/high care/ambient high care areas on site.

All ingredients are measured out and taken to the drier and encapsulation machines, and the finished product is dropped directly from the machines into the finished product bags/boxes so there is no opportunity for cross-contamination.

Measures to promote social distancing include the formation of staff zones, and where possible teams have been working from home to reduce the overall number of people on-site.
Visitors to site have been reduced to a minimum with prior approval being required and planned.

Contractors and visitors are supervised on site and have electronic signing in procedures which include checks on COVID-19 exposure, temperature checks, and references to relevant procedures and requirements for the areas visited and prevention of hazards and product contamination.

There were no temporary structures noted.

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Internal fabrication is well maintained with wall/ceiling cladding in the two small blending rooms. Other areas are a combination of white panelling and painted block, all well maintained and clean.

Floors are painted concrete and while there are signs of wear and paint removal over time, the floors are kept clean and there is no risk to product which is mainly enclosed.

Drains are only located in the designated wash area, with traps to collect product debris. No water pooling was noted.

There are no suspended ceilings or roof voids.

There are plastic inoperable roof sky lights, and no external windows. Internal windows are plastic and all lights are covered and protected.

No elevated walkways.

There are extraction systems incorporated into the processing areas and localised to equipment where required, with controlled and filtered/scrubbed extraction to outside.
External doors are either keypad secured, alarmed (fire exits) or kept closed/screened except when in use for material movements.

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4.5 Utilities – water, ice, air and other gases

Water used on site is potable and mains supplied from Bristol Water, results from 01.07.2019 – June 2020 held. Annual microbiological and chemical analysis is obtained from the supplier and additional surveillance testing is carried out by an external laboratory OneScientific. Results seen for Ladies Cold Tap 06.02.20, Equipment wash hose 06.02.20, and Mains inlet tap on 09.04.20.

There is a plan of the water distribution system dated 07.09.17. Water is not used in the production of the products. Sample points have been identified using risk assessment based on the "Justification for Microbiological Monitoring Programme QMF188, iss 2, 13.10.20".

There is additional testing for Legionella, last completed on kitchen, gents WC, sieve wash sink and kitchen unit 6 on 28.05.20 – N.D.

Ice/steam is not used.

Compressed air is filtered and used for equipment operation and used in the atomisation process. The compressor system is calibrated by Compressor Systems to check that there are no contaminants and to replace the filters, last completed 29.09.2020, and serviced 21.09.2020. CR100 used to keep motor cool, CR300 used on bearings, to open bottom doors and atomisation of the fat. Spray drier used to operate external hammers.

Liquid Nitrogen is used in the CR300 – supplied by BOC, with certificate of compliance with Regulation EC No. 1333/2008, and Regulation (EC) No. 1935/2004, and others.

4.6 Equipment

Equipment on site consists of industry standard equipment, e.g. spray chiller, fluid bed coating, Forberg mixer, ribbon blender, paddle mixer and spray driers, conveyors, liquid blending, melt tanks. Other food contact equipment and utensils include valves, funnels and flexible hosing/tubing.
All machinery is well maintained and constructed of food grade stainless steel and equipment can be stripped down for manual cleaning as required; all equipment is cleaned down between every batch and at the end of shift.

A new equipment risk assessment and validation system "New Equipment Commissioning Procedure QMF109, iss 4, 28.09.17" is in place with engineering, technical and hygiene assessment prior to purchase, seen completed for a new heat sealer on the CR300 completed 16.04.20.

The following certificates/evidence was seen to confirm suitability for food use: Blue food grade rubber, used to make seals, supplied by Provincial Rubber EC1935/2004 dated 15 Sept 2004, PIAB conveyors for transporting powders, supplied by Armorvin / RS Components EC1935/2204 dated 21.05.2015. Food clean steam hose – QJS food contact statement 1935/2004.

4.7 Maintenance

The on-site engineering team are responsible for day to day servicing and maintenance of equipment and plant. Specialised equipment, such as shutter doors, alarms, boilers is subcontracted to specialist servicing. The schedule for maintenance is based on risk, historical information and manufacturers' recommendations and is planned out on a calendar with individual schedules for each piece of equipment used to record the specific dates the equipment is serviced. "Blender Record QMF 159a, iss 2, 14.03.13" reviewed and Job Sheet for maintenance on 14.05.20 ID1405201 checked to ensure

hygiene clearance sheet (QMF60) signed off by both engineering and technical.

No temporary repairs were noted. Temporary repairs are subject to recording on maintenance request logs.

The safety and legality of products is protected during maintenance by carrying out maintenance outside production hours, and removing equipment, where possible, from the production area. There is a documented hygiene clearance procedure “Maintenance Job Sheet QMF60, iss 3, 01.03.18” which takes place after maintenance. Equipment and machinery are inspected and signed off by engineering and technical before being released back into production.

All chemicals/lubricants used are suitable for food contact where applicable and details of allergen status has been obtained. Ambersil used with NSF H1 certification, and allergen declaration held dated 23.01.20.

The engineering workshop is located in unit 6, with swarf mats in place to control contamination, there is no food preparation or packaging in this unit.

4.8 Staff facilities

Staff changing facilities are sufficient and maintained in good and clean condition. Outer wear/personal items and workwear are stored in separate lockers.

The production area is accessed with hands free hand washing facilities and suitable toilet facilities are provided, both of which meet clause requirements.

There is no catered canteen; however, a staff kitchen is provided with microwaves, kettle, toaster and refrigerators which are cleaned, and temperature monitored weekly on “QMF 58, iss 4, 20/07/2016”.

An external smoking area is provided, with a cigarette bin, and staff must remove their protective clothing prior to using. Entrance back into production is via the changing and handwashing facilities.

In response to Covid-19 additional cleaning has been introduced, and all staff are reminded to clean work areas before leaving site. Only production and QC are allowed in the canteen and this has been limited to 4 at any one time.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

Non-food chemicals are risk assessed and managed. Chemicals are stored in a designated storage area with restricted access. The main chemicals used on site are: Jansol Extra (MSDS held supplied by GMP Chemicals) which is used for all equipment cleaning, Sanitiser and antibac soap (Deb), Antifoam (Univar).

Strongly scented materials are stored in dedicated locked cabinets away from other materials.

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4.9.2 Metal control

There is a documented “Metal Control Policy POL14, iss 2, 08.10.19” in place with a registration system for sharp utensils and equipment.

Daily start up checks are performed and recorded on “Blade Control Procedure PRW59, iss 1, 12.06.17”, this was seen complete for knife held by P.S. There are also Toolbox inventories completed and recorded on “QMF79, iss 15, 06.09.19”, as observed complete in unit 4.

Staples, pins etc are not used in open product areas or packaging.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Monthly glass and brittle plastic audits are carried out by the Technical or QC team, reviewed for 03.08.20, completed by IP in Technical. There is a daily start-up check recorded in MESTEC by the operatives for all glass and brittle plastic in the immediate vicinity of the production equipment, seen completed by NM An appropriate glass breakage procedure “Broken Glass and Hard Plastic Procedure PRW27, iss 7, 15.10.18” is in place which includes, training of staff, isolation, cleaning, safe disposal of contaminated product and authorised clearance inspection procedures. No breakage incidents have been recorded for the last 12 months.

There are plastic sky-lights in production and storage areas. Internal windows are plastic and all lights are covered and protected.

4.9.4 Products packed into glass or other brittle containers

NA

4.9.5 Wood

Wood is restricted to finished product pallets

4.9.6 Other physical contaminants

Procedures are in place, as part of “Foreign Body and Glassware Control PRW3, Foreign Bodies point 4”, to prevent physical contamination by raw material packaging. Relevant work instructions also specify that operators should ensure safe opening of bags, so none enters the system, seen for “Powder Blending and Sieving PRW4”.

Pens used in open product areas are controlled; food safe metal detectable pens with no small parts.

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

Following a documented assessment as part of the HACCP study, the following types of foreign object detection/removal equipment are used: Sieves, and metal detection on the C300 as a customer requirement.

4.10.2 Filters and sieves

Filters/sieves are used and are checked/inspected for integrity at the start and end of every run, with records retained within the MESTEC system. If these checks are not completed then the MESTEC system will not permit the process to continue.

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The mesh size is specified within the production order and on the specification, with each sieve engraved with appropriate size. All sieve details are recorded on “Taste Tech Ltd– Sieve Register QMF46, iss 5, 05.08.19”. Any material retained by the sieves/filters is inspected and recorded to identify contamination risks. CCP Monitoring PRW30, iss 5, 01.10.19, point 3, requires foreign bodies to be reported to QC who will raise a NC report.

4.10.3 Metal detectors and X-ray equipment

A risk assessment for metal contamination has been carried out and it has been concluded that metal detection would not improve the protection of final products from metal contamination because sieves are in place for all products packed that are finer than the any MD’s sensitivity could be. There has never been a metal complaint and all product is sent to processors for further processing. “Justification for not using metal detections a CCP QMF180, iss 5, 02.11.20” is in place.

Products encapsulated down the CR300 line are metal detected for a specific customer, but this is only because of customer request and is not classed as CCP as sieving is in place.

The method of rejection is belt stop/alarm for the 25/50 kg bags. “Metal Detector Check QAW19, issue 5, 15.10.20” ensures the effective removal and isolation of products identified as potentially containing metal. Products would be inspected to identify the source of the metal.

Detectors are tested start and end and hourly if more than 2 hours run, with 3mm Fe, 4.5mm non-Fe and 4.0mm SS test pieces, results of checks are recorded on QMF81. Tests performed include belt stop and alarm. The MD procedure and checks were demonstrated competently by AC.

4.10.4 Magnets

Not in use

4.10.5 Optical sorting equipment

Not in use

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

None

4.11 Housekeeping and hygiene

The site and equipment were seen to be maintained in a clean and hygienic condition.

Full and detailed cleaning procedures are in place for all areas and equipment and held within MESTEC, reviewed for “CR100 Dryer PW9, iss 7, 18.07.19”. Cleaning is carried out every day at the end of shift with full machine strip down as relevant and equipment washing by operatives at product changes using spray balls with up to 5% Janitol introduced to large vessels after steaming to soften fat. Cleaning is verified by visual inspection.

Limits of acceptable and unacceptable cleaning for food contact surfaces and equipment are defined by environmental swabbing standards and key inspection points in cleaning methods.
There is monthly micro-swabbing of the machinery against schedule QMF 152, iss 6, 17.07.19.

Validation records are available to show that cleaning regimes are effective. The Janitol Extra chemical is

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automatically dosed, or hand diluted, to a strength of between 0.5 and 5%, and the strength s checked by QC following procedure “Determination of Multi-purpose Cleaner Dilutions QAW45, iss 2, 03.10.19”. Rinse water checks are carried out after cleaning using a pH stick and recorded within the MESTEC system.

Start-up hygiene checks are recorded within MESTEC for all key processes and equipment.

There are colour coded and dedicated cleaning utensils based on usage e.g. Yellow – spillage, Red – waste, Blue – product contact surfaces (inside vessels) Green – outside of vessels.

4.11.7 Cleaning in place (CIP)

None

4.11.8 Environmental monitoring

A documented environmental monitoring programme QMF152 is in place, based on a risk assessment “QMF188, iss 2, 13.10.20”.

The programme includes:
Page 3 of 6 of the programme has tabulated the tests performed, location and frequency of samples and the sampling procedure. Total counts, Entero, Yeast and mould on food contact surfaces, Listeria on non-food contact surfaces such as drains, TVC at 37 and 22, coliforms, E coli, sulphite reducing Clostridia and Enterococci on water samples.

There are no legal requirements, such as max levels of specific organisms, frequency of testing. Results were reviewed in 2020 identifying trends over the previous year to identify whether any additional testing was required, and it was identified that inaccessible areas were not being tested so these have not been included in the new sampling schedule.

Appropriate control limits are in place, identified on “Microbiological limits, corrective actions and procedures, QAW39, is 4, 15.07.19” which lists satisfactory, borderline and unsatisfactory microbiological results.

There are no legal or customer limits

The programme is reviewed minimum annually and would be reviewed if there were changes in processing/equipment, if the programme failed to pick up a serious issue, if out of spec levels were found in products and if the site got consistently negative results, indicating that the programme was not effective.

4.12 Waste

All waste is cleared regularly from the processing areas and stored in suitable and identified containers.

Waste is collected from site by licensed contractors: Biffa CBDU104360 Exp 23.05.2022 for general waste and card, plastic etc for recycling. Augean Treatment Ltd collect the chemical waste CBDU65821 Exp 13.10.2021.

No animal by-products.

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There are no unsafe products/trademarked waste.

4.13 Management of surplus food and products for animal feed

No customer branded products
No retail product, no staff sales etc.
No products for animal feed.

4.14 Pest management

External contract with ROKILL covers insects and rodents and consists of 8 routine visits and 4 in-depth inspections per year. Full records of pest control are maintained including site plan dated 06.02.20, bait data sheets, operative training records, records of inspections and treatments. The last visit to site was carried out on 21.10.20 with one issue identified to remove vegetation from behind the building - this was signed off complete on the 09.11.20.

In-depth pest control surveys are undertaken at a frequency based on risk and the last one was 07.08.2020. The risk assessment is reviewed annually, last 20.04.20.

All non-toxic baits are secured and used throughout the site.
All recommendations are completed by the company in a timely manner.
No evidence of infestation was seen at the audit or has been identified during visits.
Inspection results are analysed for trends, reviewed annually and when there is an infestation.
No issues highlighted through trending reports, reviewed for 2020.
EFKs are situated throughout the site and catch tray analysis is performed (frequency).

The site has identified that there is no risk from birds roosting or entering the building.

Employees have been trained to understand the signs of pest activity and to report any evidence of pest activity, seen for NM 14.07.17.

4.15 Storage facilities

No temperature-controlled storage is required for safety or finished product quality. There is some chilled storage of raw material oils for quality purposes, but this is not monitored as any deterioration would be picked up in further processing checks.

Products are long shelf life and are stored on site.

FIFO systems are used throughout the site to ensure the products are used/despatched in correct order.

The following systems are in place to prevent cross-contamination during storage: all products are fully packaged in either rip ‘n tip bags and palleted or in lined boxes, jerry cans or IBC’s.

There is no controlled atmosphere or outside storage.

Packaging is stored away from raw materials and finished goods. Part used packaging is inspected for suitability/cleanliness and covered or returned to store at the end of run. There is no obsolete packaging as there is no pre-printed packaging.

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4.16 Dispatch and transport

The company only uses contracted haulage companies.

Product safety and quality are maintained during loading and transportation by all goods being packed in sealed containers on over-wrapped pallets. All products are transported at ambient. Vehicle checks are recorded for unloading of vehicles.

“Dispatch Checklist QMF35, iss 14, 18.07.18” is completed by QC for all despatches, covering clean packaging, tamper proof seals, vehicle and packaging condition. The despatch operative also stamps the despatch note to confirm vehicle condition, seen for despatch 49128.

Forklift trucks, pallet trucks and loading hoses are cleaned and checked according to “Forklift Truck PRW45u, iss 2, 23.07.19” procedure, with cleaning recorded on QMF66.

Approved third party hauliers are used; Davis Turner, Prompt, DSV, Gefco, and detailed contracts are in place which include security of load, cleaning, breakdown and maintenance and meet the requirements of this section. Transport Agreement – LOG2501 25.10.17, signed by Prompt on 12.03.18.

Details of non-applicable clauses with justification

Clause/section reference	Justification
4.2.2	No raw materials or products have been identified as being at particular risk while on the site.
4.3.5	No temporary structures
4.4.5	No suspended ceilings or roof voids
4.4.6	No elevated walkways
4.4.7	No opening windows posing a risk to products.
4.8.8	No catering facilities provided.
4.9.3.4	No risk to product from glass windows
4.9.4	No packing into glass or brittle containers.
4.10.4	Magnets are not used.
4.10.5	Optical sorting equipment is not used.
4.10.6	No rigid containers used.
4.11.7	No CIP.

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4.12.3	There are no unsafe products/trademarked waste.
4.13.1	No surplus customer branded products.
4.13.2	No customer branded products passed to charities or other organisations, and no staff shop.
4.13.3	No products for animal feed.
4.14.3	Pest control is contracted externally.
4.14.3	No temperature-controlled storage is required.
4.15.4	No controlled atmosphere storage areas required.
4.15.5	No outside storage required for product.
4.16.3	No temperature-controlled transport required.

5. Product control

5.1 Product design/development

New product variations include changes in formulation, which is generally different proportions of ingredients already in use.

Guidelines are in place which details the following restrictions to the scope of any NPD: the requirement to maintain a low risk environment, no animal products, no allergens and no glass, but this will be reviewed on a case by case basis.

An NPD procedure “Design & Development Procedure PRM12, revision 12 15.10.20” is in place, with appendix 1 detailing the process of assessment carried out by the Technical SAP Team who are HACCP Team Members, and Appendix 2 covering validation of the HACCP. The assessment is to ensure that all new products already correspond to an existing HACCP process and if this is not the case then a full HACCP team review is required.

New products are entered into the ERP system where formulations will only go live when cleared by a member of the Technical SAP team who has minimum Level 2 HACCP.

New raw materials/contact packaging are approved on “New Raw Material and Contact Packaging Form for Factor Destination QMF115, iss 8, 28.10.19” seen for Butyl Alcohol Natural on 20.10.20.

There is a “New Product Handover for Factory Destination QMF170, iss 5 29.01.20” - seen for LQ Caramelised Milk Nat Fl 207873, signed off by operations on 25.09.20 but still to be finally signed off by Gate Keeper (Technical administrator) as the process is not yet complete.

Shelf life is determined and validated through EOL testing, based on the conditions expected throughout the life of the product – results seen for LQ Lemon Type 207069, lot 528891, manufactured on the 05.03.20 and tested on 09.10.20, recorded on “Shelf Life Testing Summary Sheet QMF166, ISS 2,

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17.11.15".

5.2 Product labelling

There is no retail labelling as all goods are for further processing. Box end labelling temperature-controlled was reviewed during the audit for Chocolate Flavour 207738. Information includes product name, manufacture date, shelf life, not to be consumed in raw form and hazard symbol if relevant.

Finished product labelling information is generated by the production planner, verified by the sale admin then checked again by the production operative.

There are no nutritional/suitability/compositional claims made.

No labelling information for which the customer or other third party is responsible.

5.3 Management of allergens

There are no allergens handled within the manufacturing facilities and no tree nuts, peanuts or sesame on site.

An allergen policy is in place "Allergen Policy POL06, iss 4, 09.10.19". All raw materials, products and the process have been risk assessed. Supplier declarations are obtained for raw materials. If insufficient allergen information is provided, an "Allergen Risk Assessment 31.10.18" is sent to obtain more detailed information.

Visitor questionnaires include questions relating to allergens.

The NPD policy restricts the development of products containing allergens.

No "free from" claims are made.

There is a "Nut & Sesame Seed Policy POL87, iss 4, 11.10.16", staff are not allowed to bring peanuts, tree nuts or sesame seeds on site.

Visitor questionnaires include questions relating to allergens.

No allergen warning labelling is considered necessary.

5.4 Product authenticity, claims and chain of custody

The site obtains information on threats to the supply chain which could lead to adulteration/substitution of raw materials by reference to RASSF, Food Alerts and market reports to check on shortages. Naval attends Campden meetings which discuss up-and-coming threats.

A documented vulnerability assessment has been carried out by product group, reviewed for RSPO Palm Oil, which is rated as being highly likely for substitution. The risk rating identified leads to the plan for how any risks are mitigated, with the Palm Oil risk mitigated through obtaining CoA on every batch, supplier approval and RSPO certification. Due to high risk this is also assigned as needing QMF149 which details extra testing/checks required. Delivery of Palm Oil on 24.09.20 reviewed CoC and CoA in place, and sheet

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QMF149 complete.
All assessed on form QF175, iss 1, all reviewed on 20.10.20

The risk assessment and actions are reviewed annually as a minimum, with regular checks of the source of information as detailed above.

The following particular adulteration/substitution risks have been identified in addition to the RSPO Palm Oil described above:
bmtrada RSPO certificate of registration held, exp 18 March 2024.
Seville Orange essential oil - certificate of origin check and GC check, Natural Vanillin – GC check

The following raw material status claims are made: Seville Orange

The following method of production claims are made: Halal – certificate exp 23 April 2021, Kosher – certificate issued 20.07.20. The site has organic certification by the Soil Association but there has never been any production/sales.

Documented mass balance tests are carried out at least 6 monthly and, for method of production claims that are covered by other certification, such as Kosher, according to that scheme's requirements – seen for raw material R001 (rapeseed oil), RSPO and Kosher on the 14.10.20.

When Halal is manufactured a Halal representative is on-site to audit the process, for Kosher all ingredients used on-site are Kosher, and for Organic "Provenance, Assured Status and Claims of Identify reserved Materials PRM21, iss 2, 0612.14" is in place.

5.5 Product packaging

Products are packed into blue bags in cardboard boxes or HDPE plastic jerry cans.

Food contact information and suitability for the intended product has been provided by suppliers of all food contact packaging.
Flexipol Packaging Ltd – BRCGS for Packaging Materials, exp 24.02.2021 – Food contact declaration dated 03.01.19
Invopak who use Packchem Ltd – BRCGS for Packaging Materials exp 22.03.2021 – Food contact declaration, Reg. 1935/2004 and others, held dated 20.06.18

The blue plastic bags are 125 mu.

Traceability for all packaging used is recorded and maintained.
There is no obsolete packaging, as only blue bags and jerry cans are used, with labels printed on site.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Microbiological product analysis is sub-contracted to OneScientific which is carried out as surveillance only with a schedule covering all product ranges annually or more frequently if customer required.

The following laboratory tests are also carried out: ALS used for pesticide residue testing and heavy metals.

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The testing schedule is considered to be appropriate, based on the risks associated with the raw materials and products.

Trend analysis and reviews of all test results are carried out by the Technical team and any out of specification results are risk assessed to determine whether a re-test is required or if the batch needs to be disposed of.

The following tests are carried out on site: organoleptic, RI for oxidation on liquids, acidity test, Gerhart, pH, active content by either titration or extraction of fat with active determined by remaining weight, GCMS for purity, moisture using procedure "Measurement of Moisture using Karl Fischer Method QAW42"

Shelf life is validated and routinely verified, with results recorded on "Shelf Life Summary Testing Sheet QMF166"

5.6.2 Laboratory testing

Pathogen testing is subcontracted to One Scientific Ltd – UKAS 2048, iss 18 Aug 2020.

Testing may also be undertaken at: ALS Laboratories (UK) Ltd, UKAS 1282, iss 2 Sep 2020.

Laboratory results are reviewed by the Technical team, and there is regular QC Proficiency testing, last completed by all staff 27.10.20

5.7 Product release

Products are positively released by the QA/Lab dept. All products are assigned the hold Q code and only released following QA completing tests as required within MESTEC, and confirmation that the MESTEC Works Order has been completed correctly by production.

A certificate of analysis is completed and then the product is automatically released within SAP by removing the Q status.

5.8 Pet Food

None

Details of non-applicable clauses with justification

Clause/section reference	Justification
5.2.3	No consumer claims made.
5.2.4	There is no labelling information for which the customer or other third party is responsible.
5.2.5	No cooking instructions are provided

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5.3.2	No allergens handled on site
5.3.3	No allergens handled on site
5.3.5	No rework of allergen containing material.
5.3.6	No warning labelling is used
5.3.7	No “free from” claims are made
5.3.8	No allergens handled on site
5.8	No pet food

6. Process control

6.1 Control of operations

Documented process specifications and work instructions/procedures are in place which reflect agreed finished product specifications, all held within MESTEC.

There are no equipment settings which are critical to the safety or legality of the product. WIs are in place for all operations - WI PRW40 was reviewed for the CR300.

Before production MESTEC checks include: Cleanliness inspection, CCP check - Sieve checks, Glass in the area, packaging checks & traceability coding, metal detection when relevant, QA positive release to remove the Q status in SAP.

The following process monitoring checks are carried out and recorded for every batch: recipes, metal detection sensitivity checks on CR300 only as a customer requirement, weight checks and labelling

Raw materials, labels and packaging is kitted up on to pallets in preparation for the manufacturing process. There is a weighing booth for the preparation of raw materials required in quantities smaller than 25kg for powders in Unit 4 and weighing scales to 4 decimal places in Unit 5 for preparation of liquid ingredients

There is no in-line monitoring. There are no critical temperature-controlled storage areas with only one cold store for citrus liquid raw materials to preserve quality rather than safety.

Various operational procedures are in place in the case of equipment failure or deviation of the process from specification and all required product characteristics are verified following production by the laboratory staff to positively release stock.

6.2 Labelling and pack control

Packaging is allocated to packing lines by the Production Planner who prints the required labels prior to each batch run, as part of the kitting up process.

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"Label Checking procedure PRW66, iss 2, 08.10.20" covers the requirements for each stage of the process with the label checked by the label print operative, planning operative, production operative and QC operative who will also check the number of labels returned.

Documented start up and changeover checks are undertaken to ensure that lines have been suitably cleared, with all products and packaging from previous production removed – this is recorded in Mestec, completion demonstrated during the virtual factory tour, for changeover observed from Custard Flavouring 205897 lot 532689 to Chocolate Flavouring 207738 lot 532722.

Packaging checks, including coding and any other printing, are carried out at the start and end of packing runs, when changing batches of packaging materials and on every bag during the run as filling is manual.

6.3 Quantity, weight, volume and number control

Products are sold by weight.

Products are packed to minimum weight; each pack is individually weighed.

The system and records kept meet legislative requirements.

Examples of weight checks were seen during the trace exercise and during the virtual factory tour.

6.4 Calibration and control of measuring and monitoring devices

The site maintains a "Calibration Record QMF38, iss 17, 29.10.19" which identifies the item, location, calibration method, result, responsibility and frequency.

The calibration procedure details the corrective action procedure, should measuring equipment be found to be inaccurate.

Scales are verified for each batch using a set of known weights calibrated by South Gloucester Council, last on the 19.10.20. Scales are also calibrated annually by Bristol Weighing Machine, seen for powder weighing scale 43598 on 03.03.20.

Calibration certificate in place for the Auto-titrator AT510N, test date 12.05.20.

The calibration "Weight Checking Procedure PRW49, iss 2, 19.11.20" details the corrective action procedure, should measuring equipment be found to be inaccurate.

Details of non-applicable clauses with justification

Clause/section reference	Justification
6.1.4	No in-line monitoring devices
6.1.5	No variation in processing conditions in equipment critical to product safety & quality.
6.2.4	No on-line vision equipment is used
6.3.2	All product quantities are covered by legislation

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6.3.3	No online check weighers are used

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

The company has a comprehensive training programme for staff on induction and production roles. Induction training includes personal hygiene, PPE, hand washing, jewellery, smoking, eating and drinking, allergen awareness and handling procedures, CCPs, medicines, GMP, QMS and H & S.
Employee Induction record QMF02a seen for latest employee L.R., dated 20.01.2020.

COVID-19 has not affected the site's ability to perform training, as it's largely been moved on-line and there have been no new staff needing training. It has not been considered to necessary to complete additional CCP training as all staff are already trained in the CCP.

Agency staff are not used.

Detailed individual training records, which meet clause requirements, and a list of approved trainers are kept.

Specific training procedures and records are available and were challenged for the CCP:
CCP 1 Sieves PRW 30 v5 - AC on 30.10.19, LR on 21.10.20, NM on 29.10.19

Specific training procedures and records were also seen for the site's labelling and packing processes and other procedures: Metal Detection v 5 – AC on 19.10.20, and L.E. on 06.11.20
Labelling procedure PRW66 v 2 – AC on 09.10.20, LR on 12.10.20
Cleaning Chemical Control PRW34 v1 – MS on 29.10.19
Other staff training records reviewed included:
NM training in Site Security and Food Defence on 01.10.2019 (certificate issued)

Staff interviewed during the audit were competent in their roles, as indicated above.

Competency of staff is reviewed during competency audits. A programme of refresher training on updated procedures is in place.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Personal hygiene standards, which meet clause requirements, are documented and covered during induction training and training against "Employee Hygiene, Health & Safety Policy POL16, iss 3 08.10.19".

The correct method of hand washing is clearly displayed at all hand wash sinks and in toilet areas. Staff have been reminded of additional hand washing requirements, and new dispensers have been introduced with hand sanitisers.

The use and storage of personal medicines is controlled by the Employee Hygiene, Health & Safety POL16, with medicines locked in personal lockers.

Plasters are controlled; recorded on "Blue Metal Detectable Plaster Control QMF82, iss 2, 18.09.20", last used 02.11.20, and batch tested through the metal detector.

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There were no issues regarding compliance to the documented hygiene policies.

7.3 Medical screening

Employees are made aware of the symptoms of infection, disease or conditions which would prevent them from working with open food via, covered on the Hygiene Policy POL16 under Health, a “Return From Absence Questionnaire QM76” has to be competed.

Policy for staff members who fall ill or may have been exposed to Covid-19: Any staff exposed to COVID-19 must follow the government guidelines.

Procedure “Medical Procedure PRM14” is in place to enable staff, including temporary staff, to notify the site of any relevant symptoms, infection, disease or condition which they may have been in contact with or be suffering from.

A visitor health questionnaire is in place with a verification check by the company host.

Return to work interviews are carried out following absence/illness and this is detailed in the company handbook/rules issued to all staff members.

7.4 Protective clothing: employees or visitors to production areas

Company issued and externally laundered protective clothing is provided with documented procedures “Employee Hygiene, Health & Safety Policy POL16 – Protective Clothing & Safety Equipment” in place which cover the changing process and how the clothing should be worn.

Office workers and QC are required to wear face masks to protect the workforce.

Protective clothing worn by permanent staff includes hairnets, beard-snoods, sweatshirt, polo-shirt, trousers and safety shoes.
Visitors, contractors and temporary staff wear disposable coats, beard-snoods, hairnets.

Protective clothing is changed regularly, typically daily, based on soiling of the garment. Safety PPE is provided for relevant operations, such as eye protection, respirators and ear defenders.

The external laundry Johnsons Apparelmaster operates procedures which meet clause requirements, and hold ISO9001:2015 and ISO14001:2015

Blue disposable gloves are worn, controlled using “Glove Wearing Policy POL08, iss 2, 13.10.14”, which requires that any damage is accounted for or a senior manager informed if this cannot be completed.

Details of non-applicable clauses with justification

Clause/section reference	Justification
7.4.7	No items not suitable for laundering or disposable

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8. High-Risk, High-Care and Ambient High-Care Production Risk Zones

8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones

8.3 Maintenance in high-risk and high-care zones

8.4 Staff facilities for high-risk and high-care zones

8.5 Housekeeping and hygiene in the high-risk high-care zones

8.6 Waste/Waste disposal in high risk, high care zones

8.7 Protective clothing in the high-risk high-care zones

Details of non-applicable clauses with justification

Clause/section reference	Justification
8	No high-risk, high-care or ambient high care production risk zones

9 - Traded Products

9.1 Approval and performance monitoring of manufacturers/packers of traded food products

No traded products

9.2 Specifications

9.3 Product inspection and laboratory testing

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9.4 Product legality

9.5 Traceability

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