



Audit Report

Global Standard for Food Safety Issue 7: July 2015

1. Audit Summary			
Company name	Sharrocks Fresh Produce	BRC Site Code	5198190
Site name	Sharrocks Fresh Produce		
Scope of audit	The grading, trimming cutting and packing of fresh fruit, vegetables and herbs into overwrap trays, punnets and bags.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Finish Date	2016-07-06		
Re-audit due date	2017-07-05		

Voluntary modules included		
Modules	Result	Details

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade		Previous audit date			

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	10

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 1 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



3. Company Details			
Address	Unit G2 Red Scar Industrial Estate, Tustin Way, Off Longridge Road, Ribbleton, Preston, Lancashire		
Country	United Kingdom	Site Telephone Number	01772724444
Commercial representative Name	Jill Moon	Email	jill@sharrocks.com
Technical representative Name	John Eastham	Email	john@sharrocks.com

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	None				
Regions exported to	None				
Company registration number	N/A				
Major changes since last BRC audit	First Audit				
Company Description Sharrock's Fresh Produce Ltd is a long established fresh produce distributor and packer based in Preston, Lancashire. The company was founded in 1949 but more recently became part of the GT Group who are based in Leeds. The company has a combined turnover exceeding £40m and employs over 150 people. In Preston, they operate from our 47,000ft ² warehouse which also houses the flower business which is completely segregated from the fruit and vegetables, conveniently located close to the M6 at Junction 31a. They have extensive chilled storage facilities and a refrigerated fleet of vehicles for deliveries to be made in. As direct importers they combine their local and national sourcing of products with a long established global network, ensuring all year round continuity and availability. The Pre Packing Department currently operates 6 days per week allowing products to be stretch wrapped on trays and punnets. The flow wrapped products can be either loose or on trays. They offer a bagging facility and all their products can be labelled prior to packing into an outer case or a returnable retailer's case. Allergens handled on site include celery within the pre-pack area and milk, eggs and nuts within the storage and distribution part of the business					

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 2 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price

5.Product Characteristics					
Product categories		05 - Fruits, vegetables and nuts			
Finished product safety rationale		Raw, whole fruit, vegetables and herbs; ambient and chilled storage (<5°C), short shelf life (typically < 21 days after packing), natural acidity of fruit (pH typically <5).			
High care	No	High risk	No	Ambient high care	No
Justification for area		Single ingredients, chilled/ambient storage, unprocessed product.			
Allergens handled on site		Celery Egg Milk Sulphur dioxide and Sulphites			
Product claims made e.g. IP, organic		None			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Leeks x 1 and Leeks x 2			

6.Audit Duration Details			
On-site duration	17 man hours	Duration of production facility inspection	6 man hours
Reasons for deviation from typical or expected audit duration	First BRC Food audit.		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
2	2016-07-05	09:00	18:00
1	2016-07-06	07:15	15:30

	Auditor(s)_number(s)	Names and roles of others
Auditor Number	207159	Victoria Price- Lead Auditor

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 3 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price

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 1.1.9)				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Daniel Thompson/Managing Director	X			X
Jill Moon/General Manager	X			X
John Eastham /Customer Services Manager	X	X	X	X
Wilf Whittle/Business Development Manager	X	X	X	X
John Currie/Food Safety Consultant	X	X	X	X



NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 4 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



Non-Conformity Summary Sheet

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

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

Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 5 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: Victoria Price



Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by
1	4.3.1	The low risk areas have not been fully defined on the site map.	The warehouse areas have been re-defined	The areas have only recently been established and the new pre-pack area is the only open food handling area. Previously the warehouse operations was limited and there was no production activities. Future alterations of zoning and materials movements will be assessed and approved by the HACCP team.	Factory layout and movement ;Low risk areas clearly identified	2016-08-17	VPRICE
2	4.8.7	There was no advisory sign to wash hands in the ladies toilet.	A hand wash reminder sign has been placed in the ladies toilet	The toilet is not used because the only female employee in the pre-pack area prefers t use the office accommodation toilets and the absence of a sign was not noticed for this reason. The ladies toilet will be included in the internal audit program.	Female toilet hand wash	2016-08-04	VPRICE

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 6 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: Victoria Price



Minor							
3	4.9.1.1	Cleaning chemicals were not being stored in an area with restricted access.	All chemicals will be issued by nominated personnel only from a locked storage area. Chemicals in use will be kept in a designated crate under management control. There is now a procedure in place and this is recorded in reports, checked at monthly management meetings.	The chemicals observed were not in the designated storage because they had been in use but were not returned as per standing instructions. The chemicals were not formally issued to the personnel who had left them in the warehouse. Employees will be given refresher training in the use and control of chemicals	Chemicals storage ;Chemicals storage in locked cupboard;Essential training revisited;Cleaning Chemical training revisited	2016-08-19	VPRICE
4	4.9.2.1	Knife register had not been completed at the time of the site inspection	A register has been created and will be completed	There are only 4 people authorised to work in the area who have all had training in knife handling. There are only 2 large knives, 1 small knife, 1 pair of scissors and a pair of secateurs in use and these are issued and collected each day and locked in a drawer overnight. All of this equipment is controlled by the manager responsible for the area. A register was not considered to be necessary because of the small number of utensils and the close management of them. The criteria for assessing the applicability of BRC requirements will be re-assessed in light of this auditors judgment	Knife control register for knife 1 and knife 2;Knife training 1	2016-08-19	VPRICE

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 7 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor.: Victoria Price



Minor							
5	4.14.9	Independent, documented pest control inspections had been completed by the site consultant in addition to the 8 contracted pest control technician visits however, the consultant cannot be considered an expert in pest control (no supporting qualifications) and the reports were not individually detailed enough to support and in-depth survey had been conducted (e.g. report from 14-15/02/16 details pest control reports were reviewed but not which ones and across what time frame).	The pest control company have been contacted, they have conducted a survey and have presented a quotation for a new program to include quarterly biologist reviews. This has been approved by senior management. The food safety consultants overview will be continued in addition to the additional pest control company reports	The monthly reports of a food safety consultant included oversight of the pest control company activities and activities likely to affect vulnerability to pest ingress. This was considered adequate as a measure to ensure "expert" review of the pest control program. The auditor was presented with this information but the food safety consultant was not considered an 'expert' as unable to provide specific Biologist or Pest Control qualifications. The interpretation of the BRC requirements will be re-assessed during internal audits.	Pest Control Survey;Email confirmation from pest control company of 'expert' visit planned;Consultant reports;Pest Control Visit Report;Pest control programme;Pest control agreement	2016-10-11	VPRICE

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 8 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor.: Victoria Price



Minor							
6	5.2.1	Storage information is not consistently displayed on product labels. For example no storage instructions on the button mushrooms. Information not included to ensure the safe use of the product for example no statement such as wash before use on the lettuce.	Supplier labelled product is now checked at intake against specification to verify that the correct information is provided. Additional information is added using stickers when required. The technical manager at this retailer informs us to the information he legally requires on the label. We set the print up and the technical manager approves it.	The storage information for customer labels is dictated by them, in some cases additional labelling is provided by them. The label observed was a supplier labelled product and checks were not carried out on the label because it was not handled through the packing area by staff trained to carry out the checks. The supplier labelled product will be considered during the next HACCP review and this issue considered as part of the review. The technical manager at this retailer informs us to the information he legally requires on the label. We set the print up and the technical manager approves it.	Label example	2016-08-17	VPRICE
7	5.3.4	Allergens stored on site (eggs and milk) were not adequately segregated away from product to be used in the pre-pack area in line with the documented allergens policy.	An area of the small chill has been designated an allergens storage area and instructions to carefully clear spillages immediately has been put in place.	The allergens on site are all wrapped and are not handled. It was judged that there were no actual cross contamination risks. Spillage had not been considered an allergens contamination risk. The spillage and storage controls has been included in the internal audit program.	Allergens;Allergens;Essential training book;Allergen training refreshers	2016-08-19	VPRICE

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 9 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: Victoria Price



Minor							
8	5.6.1.3	The records for shelf life are not documented and therefore cannot verify the shelf life indicated on the product.	A formal report is now in place to conduct visual assessment of product samples after dispatch for the declared shelf life.	<p>All of the products and fresh vegetable stocks are assessed daily and any produce showing signs of deterioration is discarded as waste. This was considered the most practical method of supplying acceptable product performance. Shelf life is not considered a food safety issue for the products packed on site.</p> <p>A plan will be developed based on the results of testing to focus on the most sensitive products and to identify early signs of deterioration to allow rejection where poor shelf life performance is suspected.</p>	Shelf life 08.08.16;Essential training records;Shelf life procedure;Shelf life training with procedure	2016-08-19	VPRICE
9	6.1.1	No documented work instruction available for weight checking.	A weight control check is now in place to verify the weight at packing and the shelf life assessment includes a weight at the end of shelf life.	<p>All products are 100% packed to minimum weight. The possible weight loss for dehydration during storage had not been considered significant but had not been measured to verify that the declared weight was correct at the end of declared shelf life.</p> <p>The weight checks will be included In the internal audit program.</p>	Weight control record ;Label check and weight training. 1 hour.	2016-08-19	VPRICE
10	6.2.3	No verification available at the packing stage that the date code, quantity, origin is being checked.	Recorded checks are now being carried out against product specification for all products labelled on site	<p>Checks were being carried out by the manager in charge but there was no specific indication that individual label elements were correct against specification. It was not considered necessary to indicate that the checks were indicated against each item e.g. product name, weight, declared life, instructions for storage and use</p> <p>Labelling controls will be included in internal audits</p>	Closing check records;Label Training;Label Checking ;Quantity control procedure	2016-09-28	VPRICE

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 10 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor.: Victoria Price



Comments on non-conformities

N/A



NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 11 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: Victoria Price



Detailed Audit Report

1 Senior Management commitment

1.1 Senior management commitment and continual improvements

The site has a food safety and quality policy statement dated 3/7/16 and signed by Dan Thompson. The policy states the company's intention to comply with food safety, quality and legality standards.

The site has documented its company objectives which includes complaints less than 25 per year with a year on year reduction of 10%, completion of corrective action assigned to individuals within the deadline set. Certification of BRC food standard at Grade B or better, down time for critical equipment less than 3 hours and service level of 95% for orders to be delivered correctly and on time.

The site held an annual review on 04/07/16 covering the period June 2015 – June 2016 and was attended by Dan Thompson, Wilf Wittle, John Eastham, A Clyman and a copy for Jill Moon. Topics discussed included previous actions from the last review, a review of complaints, non-conformances analysis, incidents and accidents, supplier monitoring and performance, changes to legislation (mandatory country of origin labelling and nutrition labelling in Dec 2016), customer policies and market pressures, internal audits and external audit activity, BRC S & D audit, EHO egg inspector visits. Objectives were reviewed and confirmed for the following year. The site achieved a 10% reduction in complaints, did not meet the requirements for getting 90% of corrective actions completed within deadline and achieved the QSL of 95%.

The site has a range of methods of ensuring that the senior management is made aware of any food safety, legality and quality issues. These include drop box summary graphs of complaints. Once an item is altered a notification email is sent to a pre-set team which includes senior managers, a weekly walk round with the sales team, Managing Director and Pre-Pack Manager, issues identified are recorded on a white board in the sales office. Complaints are discussed with the Managing Director and Food Safety Consultant, and meetings with the Food Safety Consultant. Meeting notes dated 17/5/16, 25/4/16, 14/5/2/16, 10/2/16, 27/1/16, 15/12/16 and 30/11/15.

The site remains up-to-date through information provided by the Food Safety Consultant, BRC – Participate (through the consultant), FSA website, RASFF website, FDA database and publications such as Fresh Produce Journal, The Grocer and Transport Monthly.

Product is sold in the UK and some product is exported through a third party.

The site has an electronic PDF version of the BRC GSFS Issue 7, which has been printed off.

This is the first audit under this standard and new owners (Dan and Richard Thompson), therefore there are no non-conformances raised at a previous audit and no time-scales that need to be complied with.

1.2 Organisational structure , responsibilities and management authority

The site has an organisational chart (Issue 2 5/7/16 circulation 1) which includes reference to Dan Thompson Managing Director, Jill Moon General Manager, Chris Cowburn Transport Manager, Mark Powell Night Manager, John Eastham Customer Service, Wilf Whittle Business Development, Paul Hunt QC Goods Inwards, Paul Moulding Prepack Dept., John Eastham Customer Service.

Absence cover is documented and includes details of the Job holder, primary deputy and secondary deputy e.g. MD Daniel Thompson is covered by Jill Moon and John Eastham. Stock control is covered by Paul Hunt, Craig Cowburn and Michael Harrison.

Job descriptions and training (internal and external) summarise the role responsibilities. Each employee has recently had an appraisal and discussed their roles. Job descriptions for a Pre-Pack Operative and Pre-Pack Manager were reviewed.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 12 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: : Victoria Price

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2 The Food Safety Plan - HACCP

The HACCP Team is lead by John Eastham (Customer Services Manager) who is Level 3 HACCP trained 15-16/1/14. Other team members include Wilf Whittle (Business Development Manager), Jill Moon (General Manager) and Paul Moulding (Pre-Pack Manager). Additional support is provided by John Currie (Advisor (Consultant Food Safety Systems), however the day to day management of the plan rests with the site.

The scope of the audit is defined as being the warehouse and distribution operation with a small packing operation. Products are broken down, as fresh produce, chilled packaging foods, ambient stable foods, and non-food items. The HACCP study relates to all traded food products. Products are distributed in the company fleet of temperature controlled vehicles.

The prerequisite programme includes specifications, supplier quality policy, spillage controls, employee allergen awareness training, internal audits, security measures, GMP inspections, vehicle maintenance, breakdown procedures, stock control, waste management, pest control and training.

The products packed includes a range of fruit and vegetables. There are products that have an adverse risk on sensitive consumers i.e. celery, eggs, milk and cheese. Cheese and milk are fully packed. Products are listed under the storage conditions of ambient, chilled dairy and chilled fruit and vegetables and are stated as being <5°C.

Label information is stated as including the correct storage conditions, expiry date and suggestions for product use.

The HACCP team have referenced EU & UK Legislation and listed references on page 3 of the HACCP plan. Codes of practice referred to include Codex Alimentarius guide to the implementation of HACCP, Food Industries Manual, BRC Global Food Standard and BRC Storage and Distribution Standard Issue 2 and legislation such as EU 2002/72, Regulation 178/2002, Egg Products Regulations, Food Safety Regulations 1995.

The products are described as being suitable for all consumer groups with the exception of allergens for allergen sufferers. Products are required to be used in conjunction with the label requirements e.g. storage temperatures and duration.

The site has two process flows; one for ambient stable products and one for chilled products. Process steps include supplier approval, purchase, packaging intake, intake inspection, storage, waste, trimming, repacking, order picking, vehicle loading, delivery, returns and waste. 11/6/15 Issue 6 Circulation 1. Reference is also made to the CCPs identified by the HACCP Team.

Hazards have been defined and include contamination from allergens, inadequate disinfection – growth of pathogens, pest infestation contamination, foreign body contamination, malicious contamination, inaccurate control instrumentation, non-approved supplier, pesticide contamination and cross-contamination of products by waste. The site have conducted a risk assessment on each hazard on the basis of impact, probability, and risk and scored each on a 0-4 basis. Risks have been graded up to 9. Those scoring 4 and above have been taken through the decision tree and are classed as significant.

Control measures are defined as staff training, controlled entrances, allergen control and spillage procedures, goods inspection, pest control procedures, maintenance procedures, cleaning plans, vehicle inspections prior to loading, calibration and servicing of equipment.

The site has used a 5 stage decision tree to identify CCPs and have concluded there are nine present. These include supplier approval, chilled food intake, intake inspection, chilled storage, order picking of chilled goods, delivery of chilled goods, vegetable trimming, intake of packaging and check of returned goods.

Limits of control have been defined as meeting specification, labelled with batch code, supplier ID, ingredients, all allergens cleared to reduce the risk of cross-contamination within 15 minutes. No expired products, no pest activity in the food storage and handling areas, equipment verified as clean and free from sources of contamination before being put back in service. Verification of the CCPs is conducted and documents are signed off by the supervisor.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 13 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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Monitoring of CCPs is undertaken during the daily start-up checks, visits by pest contractors, weekly hygiene checks and annual performance reviews. CCP 1 for supplier approval was checked, electronic records are retained which include a date and time of the supplier approval result.

Corrective actions are recorded on the non-conformance log, complaints and non-conformance procedures.

Verification of the HACCP plan is demonstrated through internal audits, review of records, review of complaints and a verification questionnaire which has been signed by the team on 17/5/16.

The HACCP plan was last reviewed on 17/5/16 following the re-organisation of the prepack function of the business and in preparation for the BRC Food Audit. There were no significant changes to the HACCP plan.



NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 14 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



3 Food safety and quality management system

3.1 Food safety and quality manual

The site has a printed copy and electronic version of the manual available via Dropbox. A further read only version is available on the network for all staff to access. The manual contains the policies and procedures on site and is written in English. The site uses signage where appropriate to further convey messages - such as hand wash signs.

3.2 Documentation control

Each document has properties embedded in the footer, which contains all the file information, issue number, amendment details and history of the changes in the comments field. The site holds an electronic list of documents and the properties of each document is held electronically.

The Technical Consultant is responsible for ensuring the latest versions are in use and adheres to the document control procedure CP009.

3.3 Record completion and maintenance

Electronic data is backed up daily and is held for 2 months and then archived for five years.

3.4 Internal audit

The site has an internal audit procedure CP008, with audits scheduled on the basis of sensitivity. All areas are audited at least annually. Site inspection and operational activity audits are conducted 12 times a year and are reported at management team meetings where a corrective action plan is maintained.

Internal audits are conducted by the external technical consultant to maintain independence. Operational audits for 17/5/16 and 25/04/16 were reviewed. Conformity and non-conformity had been reported. Details had been reported to the person responsible and timescales allocated. The status of the corrective action is tracked and details discussed at the following meeting.

Hygiene inspections are completed and verified on the cleaning records. Further checks are undertaken on the inspection report undertaken by the Technical Consultant. Fabrication inspections are completed as part of the inspection report conducted by the Technical Consultant. Completed records were reviewed for 15/12/15 and 30/11/15.

3.5.1 Management of suppliers of raw materials and packaging

The site has a documented risk assessment as part of the HACCP plan HACCP004 11/6/15 Issue 5 which takes into account the potential contamination of raw materials for allergen, foreign body, microbiological and chemical contamination. Reference is also made to packaging. CP024 Supplier Approval procedure 1/3/07. All suppliers are formally approved before contracts are agreed. All suppliers are required to have a third party audit, contracted audit or are approved following a visit by a suitably qualified Sharrocks representative.

Examples reviewed of a self audit completed by Sharrocks representative Wilf Whittle for Evesham Vale Growers, who also hold a copy of the BRC GSFS Issue 7 certificate site code 1359247 and BRC A & B Fyffes Group Ltd - Basingstoke Site code 114608.

Single purchases against unapproved sources may be approved by senior management as a written instruction.

3.5.2 Raw material and packaging acceptance and monitoring procedures

The site has a goods intake procedure CP001, which states that produce is accepted by the Warehouse Manager during site hours. Out of hours deliveries are not permitted unless very special circumstances. A visual inspection along with a temperature check is undertaken confirmation that the delivery is from an approved supplier. A visual check is undertaken on packaging arrivals.

Key data is collected including date of delivery, supplier and lot/batch codes, shelf life expiry, purchase order number and quantity delivered.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 15 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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3.5.3 Management of suppliers of services

Supplier approval procedures are documented in CP024. Supplier approval is based on demonstrable history of successful business with another reputable importer and approval by a senior manager. The supplier is required to complete a self-assessment questionnaire.

Contracts or formal agreements were reviewed for Rentokil pest control.

3.5.4 Management of outsourced processing and packing

There is no outsourced processing or packing.

3.6 Specifications

The site uses a specification approval and review procedure CP025 01/03/07 to outline the requirements for produce and packaging. The site uses plain film and generic labels which are constructed of industry standard materials. The site has in house generated specifications it provides customers with. A completed example for spring onions trimmed, authorised by J Moon General Manager dated 28/06/14 was reviewed. The specifications includes reference to COO, variety, weight, storage temperature 3-8°C, chilled transport, unacceptable defects, major defects, minor defects and the number of outers/case.

3.7 Corrective and preventive actions

The site uses CP027 Complaints and non-conformances procedure to manage corrective actions and preventive actions on site. Non-conformances are documented in a specific log which is held on Dropbox and available for key staff to review. The log includes reference to the points recorded in clause 3.7.2. Recent issues relate to basic hygiene and housekeeping – e.g. allergen segregation, broken plastic window on loading bay door, pest control awareness training. All actions have been completed and signed off as completed.

3.8 Control of non-conforming product

Control of Non-Conforming Materials are managed in accordance with CP018. Product is placed on hold and labelled accordingly. QC Hold notes were evident on waste product in the waste skip.

Production/QC/Warehouse staff are responsible for agreeing the outcome of non-conforming product. Details of the final outcome of product is outlined on the stock management software.

3.9 Traceability

All product is labelled on arrival with details of the delivery - allowing traceability to the supplier. During the audit a batch of spring onions was traced back to a supplier in Mexico - Estrella Nueva. The delivery of 140 x 12, consignment number 839439 delivered to site on 4/4/16 and sold to customers on 5-7/4/16. The product was packed using centre folded polypropylene 25 mu x 230/460mm film delivered to site on 4/4/16.

The site last tested the traceability on Little Gem Lettuce 2 x 8 Consignment number 810807. Product was delivered from J C Countryfresh on 17/11/15 and delivered out on 18/11/15 – 36 boxes in 36 boxes out.

The site ensures their suppliers have effective traceability systems through third party certification including BRC GSFS, RTA - Fresh Produce and BRC A & B.

Re-work is not usual practice, however the site ensures full traceability through the use of the original consignment numbers allocated.

3.10 Complaint handling

All complaints are logged on a spreadsheet and details are trended in terms of type of complaints. There have been three recorded incidents this year – 2 pieces of metal found in diced swede supplied by a local supplier ready diced. The other complaints related to poor quality of potatoes. The site believes this was due to seasonality issues. Pie charts are generated for management review at the meetings.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 16 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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3.11 Management of incidents, product withdrawal and product recall

The site has a crisis management plan CP019 dated 11/7/14. The recall and withdrawal procedure is documented in CP026. The General Manager is the co-ordinator for any recall and has been authorised to make recall decisions. The recall team will be made up of members from the production, quality, purchasing, sales and distribution/supply as appropriate. Members are documented, and include Jill Moon, Wilf Wittle, John Eastham, John Currie.

Reference is made to the action to be taken in the event of a crisis and a communication strategy. Reference is made to the account managers who hold a list of the current contacts. A master list of key contacts such as laboratories, pest contractors is available on a master list held on Dropbox. The site has tested the recall process as part of the traceability test in section 3.9.

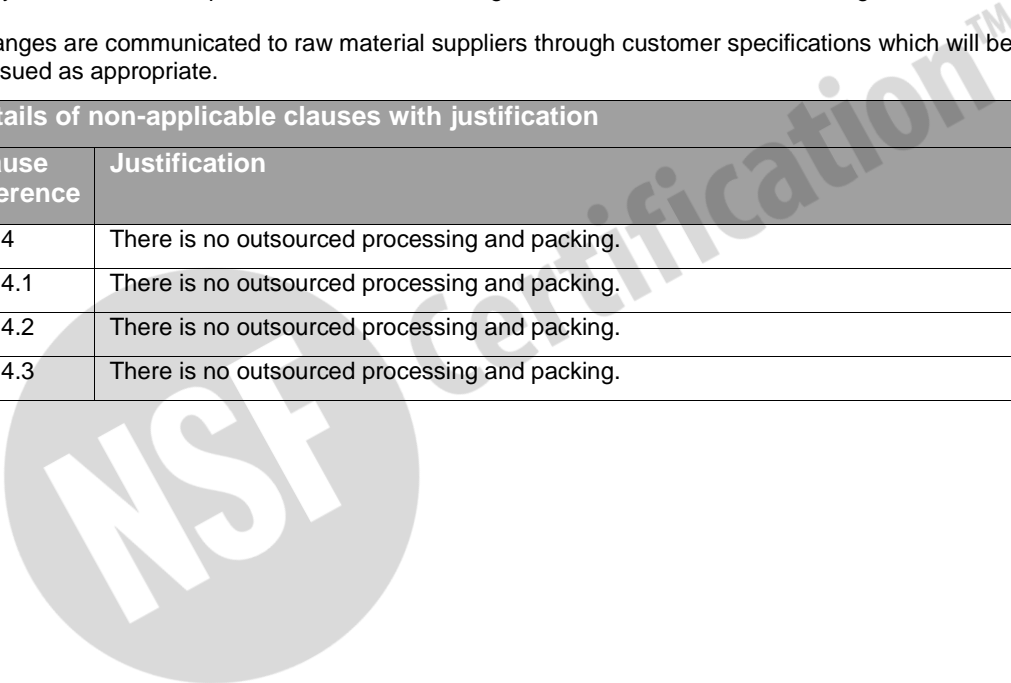
3.12 Customer focus and communication

The site holds individual contracts with customers, consequently the requirements are documented and each party is aware of the expectations. The site has regular contact with customers through the Account Managers.

Changes are communicated to raw material suppliers through customer specifications which will be updated and reissued as appropriate.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.4	There is no outsourced processing and packing.
3.5.4.1	There is no outsourced processing and packing.
3.5.4.2	There is no outsourced processing and packing.
3.5.4.3	There is no outsourced processing and packing.



NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 17 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



4 Site Standards

4.1 External standards

The site is surrounded in business units in an urban area. There are no obvious activities in the surrounding area which may have an adverse impact on finished product integrity.

The external areas are maintained in good order. The grassed and planted areas surrounding the production and storage areas are managed by an agent as part of the site agreement.

The building fabric is maintained to minimise the potential for product contamination. There is evidence of expanding foam being used to seal holes and gaps to prevent pest entry.

4.2 Security

The site has a documented assessment of the vehicle and warehouse security CP021. Security measures include buildings closed and locked – access by key fob when doors are opened from the outside, site is manned 24 hours, visitors and contractors are required to sign into the premises, regular checks are undertaken on stock to ensure the stock levels are correct and no evidence of tampering. The site is covered by 16 CCTV cameras.

There are no external storage tanks or intake pipes with external openings on site.

A letter is on file from Liz Roberts, EHO Preston City Council dated 17/12/13 confirming the site is registered as a food business.

4.3 Layout, product flow and segregation

The site has a map which shows the non-product areas such as the parking, flowers and office accommodation. The site has a factory layout and movements map which shows the access points for personnel, access points for materials, routes for the movement of personnel, routes of the movement of raw material, routes for movement of rework, location of any staff facilities and production process flow. There is adequate signage and a bell to notify staff of visitors/drivers/contractors arrival.

There is a logical movement of personnel, raw materials and packaging. There are no high risk or high care or ambient high care facilities on site.

Sufficient working space is provided to ensure all operations are carried out properly and under hygienic conditions.

There are no temporary structures on site.

See N/C 4.3.1

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

The walls are constructed of Insulated panels and floors of sealed concrete. There is no direct ceiling above the pre-pack area as the roof forms part of the surrounding storage and office areas, which is made up of cladding (translucent and solid colour). There are no windows or roof glazing which is designed to be opened for ventilation purposes and no glass windows in the production and storage areas. The doors are maintained in good condition and suitable precautions have been put in place to prevent pest ingress.

There is suitable lighting for the operation of processes and effective cleaning. There is no product washing and drainage on site. Hand washing waste water drains directly to drain.

Natural ventilation operates on site.

There are no high care or high risk facilities on site.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 18 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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4.5 Utilities - water, ice, air and other gasses

The site uses mains water only on site which is supplied by United Utilities from Z069 Stocks area. Data is on file which was last updated on 01/07/16 shows the results for the last 12 months. Water is used for hand washing, personal hygiene and cleaning, there is no product washing on site.

There are no water holding tanks, no water treatment, no water recycling undertaken and no product washing on site.

There is no air, other gases and steam used in direct contact or as an ingredient in the product packed.

4.6 Equipment

The equipment is constructed of appropriate materials. The design and placement is such that it can be effectively cleaned and maintained.

Product is placed directly onto the film or into bags and consequently there is no food contact surfaces.

4.7 Maintenance

The site has a Maintenance Procedure CP006 which states that maintenance where possible is conducted outside production hours. Planned work is conducted against a maintenance schedule, a copy of the service report is to be held by the Engineering/General Manager. The schedule is on display in the production office and was seen as part of the site inspection. All items are inspected daily and have an external service annually.

Service reports for the Adpack heat sealer dated 29/2/16, Personal Refrigeration Ltd dated 08/01/16 were reviewed.

There were no temporary repairs seen during the site inspection.

The requirements for the hygiene clearance procedure is documented as part of the signing in process for contractors. Repairs are conducted out of hours wherever possible.

There are no high risk or high care areas on site.

The site uses a food grade sealant to prevent humidity from damaging the equipment.

There are no food lubricants in use on site and no engineering workshops.

4.8 Staff facilities

The site has provided a designated area for staff to put on their protective clothing prior to working in the production and storage areas. The staff are required to put their outdoor clothing in the lockers provided or in the rest room. There are no high risk or high care areas on site.

The site has hand washing facilities which includes knee operated taps, liquid soap, single use towels, advisory signs to wash hands and hot water.

The site has a designated smoking area which is remote from the production areas and has adequate arrangements for dealing with smokers waste. Electronic cigarettes are not permitted in the production or storage areas.

All food brought onto the site is stored in a clean and hygienic state. There are no catering facilities provided on site.

See N/C 4.8.7

4.9 Raw material handling, preparation, processing, packing and storage areas

There are chemical and physical contamination controls in place.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 19 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com



4.9.1 Chemical control

Products seen during the site inspection were stated as being suitable for use in a food environment. Products were not strongly scented and were adequately labelled. The products are listed in the COSHH folder and information is available with reference to the products dilution rates, safety measures and usage instructions.

The site uses Jangro kitchen cleaner sanitiser odourless 750ml on the packing surfaces.
There are no strongly scented or taint forming materials in use.

See N/C 4.9.1.1.

4.9.2 Metal control

The site requires that knives are identified and signed in and out. There are only three knives available for use. Two large and one small.

Foreign body policy. Visual inspection of produce prior to packing. Report damage immediately.

See N/C 4.9.2.1

4.9.3 Glass, brittle, plastic, ceramics and similar materials

The site has a glass and brittle materials control procedure CP004. Glass and brittle items are inspected as part of the inspection carried out by the Technical Consultant 12 times a year. Records for 17/5/16 were reviewed.

Glass breakage procedure CP005 includes reference to the points in clause 4.9.3.3. The operation is not permitted to restart until a manager has verified the area is free from contamination. Details are recorded on the non-conformance report.

4.9.4 Products packed into glass or other brittle containers

There are no products packed into glass or other brittle containers.

4.9.5 Wood

Wooden pallets and raw material boxes (French Cauliflower) are in use. Wood controls are considered as part of the foreign body policy. All items are visually monitored prior to use.

4.10.1 Foreign-body detection and removal equipment

The site has considered the use of foreign body detection and removal equipment and details are documented in PRP 3 in the HACCP plan. There is no foreign body detection equipment in use. There is a high level of visual inspections conducted at the point of packing.

4.10.2 Filters and sieves

There are no filters or sieves in use.

4.10.3 Metal detectors and X-ray equipment

PRP 3 is a basic risk assessment considering the use of metal detectors. The management team state that metal detectors are not necessary due to the prerequisite controls in place.

4.10.4 Magnets

There are no magnets in use.

4.10.5 Optical sorting equipment

There is no optical sorting equipment in use.

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

There are no products packed into glass jars, cans or other rigid containers.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 20 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com



4.11 Housekeeping and hygiene

The site uses Caterite to provide cleaning and chemical information. All staff have the responsibility for cleaning and are trained during the induction by the General Manager.

The site has cleaning schedules which summaries the item/area to be cleaned and frequency of cleaning.

Cleaning chemicals and concentrations are documented on the cleaning usage instructions and a dilution rate for food areas of 1:10. A safety data sheet is available for SDS Jangro kitchen cleaner sanitiser which was last revised in March 2010.

All areas are cleaned at least daily and records maintained. Records were reviewed on 27/6/16, 20/06/16, 13/6/16, 6/6/16, 30/05/16.

The site has a hygiene verification procedure which states that a cleaning programme is in operation and is monitored each day. Surfaces are required to be free from debris.

A visual inspection of equipment is undertaken before it is released into production. Adverse results are recorded on the cleaning record.

The site uses blue disposable paper and blue floor mops for the prepack area.

4.11.7 Cleaning in place (CIP)

There is no CIP

4.12 Waste / waste disposal

The site segregates waste into general waste and recycled plastic waste. Neales waste is a registered carrier who collects the general waste on site. Their registration number CB/HP3715JJ was a documented on the waste collection note. Recycled materials are collected by Preston Plastics Ltd and weighbridge tickets dated 12/1/16 were reviewed.

External waste containers are identified, covered, suitable for use and are emptied at appropriate frequencies. There are no trademarked goods.

4.13 Management of surplus food and products for animal feed

There are no customer branded products in production, no products sold to staff or passed to charities and no product sent for animal feed.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 21 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: Victoria Price

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If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com



4.14 Pest Control

There was no pest activity identified at the time of the site inspection. The site has a pest prevention procedure which is the responsibility of the Warehouse Manager. The site employs Rentokil for pest control (NPTA 1446, Exp 15/4/17 BPCA M15/035 Exp 31/12/16). A generic risk assessment was conducted in September 2015. The specification covers insects, mice and rats.

The contract states 8 visits per annum. The site has recently installed EFKs and plans to undertaken catch tray analysis. The site has a map that has been updated on 04/07/16 and includes reference to the bait points on site. All baits seen were adequately numbered and identified. Treatment reports are left on site to identify the rodenticides used, associated safety data sheet are included within the file and these include the action to be taken in the event of an emergency.

Visit reports were reviewed dated as follows, 4/7/16, 29/06/16, 14/6/16, 6/6/16. Some internal activity had been recorded and follow-up visits deployed. Actions suggested by the pest contractor are recorded in the non-conformance log and follow the non-conformance procedures.

Bulbs used in the EFKs were not shatterproof. Toxic baits are in use/snaptraps are also sent. EFK's were appropriately sited and operational. Non-conforming product procedure. Details are recorded on the master schedule of inspections and comments recorded. Pest control is audited as part of the internal audit inspections.

Trends are reviewed as part of the schedule. EFKs installed beginning of July 2016. Pest prevention procedures are in place and pest control training is part of the induction training. Activity is reported to the Warehouse Manager. Storage facilities.

See N/C 4.14.9

4.15 Storage facilities

Documented procedures are recorded as part of the HACCP plan e.g. HACCP002 page 12/15. Packaging is required to be stored on racking. Limited packaging is in use. Temperature details are logged on a data logger for the prepack area and records dated between 9/5/16 – 30/6/16 were reviewed and showed temperatures were between 1.5 - 4°C. Data is downloaded three times a day. Produce is inspected daily for quality. There is no controlled atmosphere on site and no outside storage is necessary.

The site has a stock control procedure CP015. Stock is rotated on a FIFO basis or earliest expiry basis. The site has a computerised inventory system which provides stock movement reports.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 22 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: : Victoria Price

This report shall not be reproduced in part without the permission of NSF Certification UK Ltd

If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com



4.16 Dispatch and transport

The site uses the companies own fleet of vehicles to deliver produce to customers. The fleet includes 10 vehicles plus a van with loads of 3 pallets – 16 pallets per vehicle possible.

The site has documented dispatch procedures in CP007 which requires all vehicles to be inspected prior to loading. Vehicles are required to be secured before departure and every drop and vehicles are to be locked when the driver leaves the vehicles. Deliveries are within a few hours of the site.

Drivers complete a daily defect sheet and a record was reviewed for 5/5/16 for registration PJ11 VIW Temperature is recorded and is required to be between 2.5–6°C and records reviewed for w/c 23/5/16. The driver is responsible for their own lorry. The site employs their own drivers.

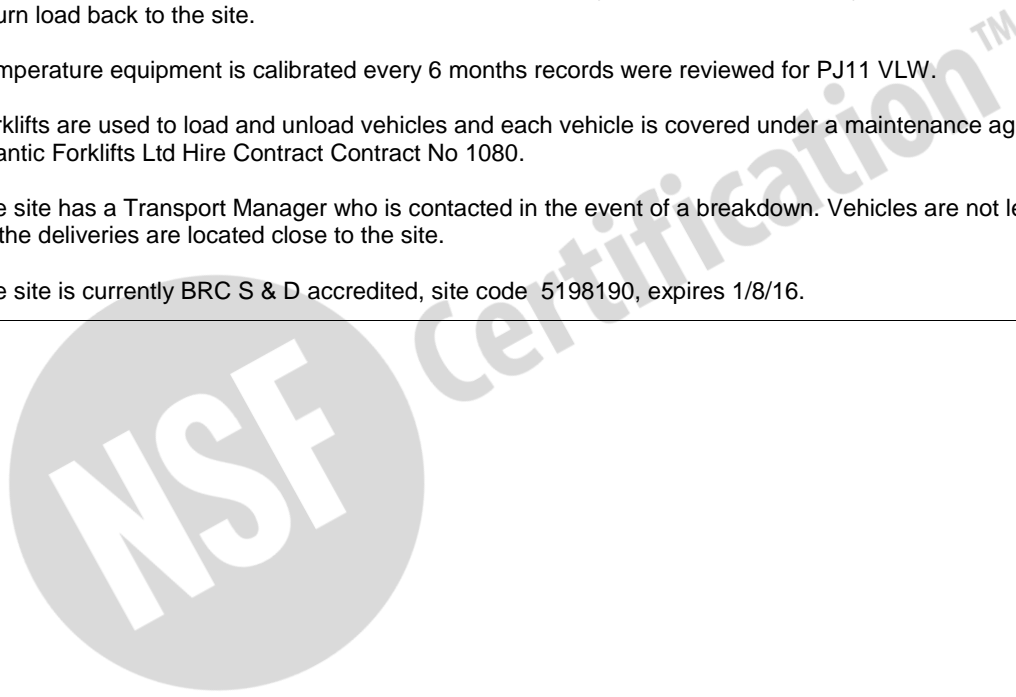
The site has a temperature control procedure which states that temperature recording equipment is maintained correctly. Manual temperature checks are taken twice daily. The operating range is between 0-6°C for chilled vehicles. Temperatures are taken at the point of first delivery, before the last delivery and upon return if bringing a return load back to the site.

Temperature equipment is calibrated every 6 months records were reviewed for PJ11 VLW.

Forklifts are used to load and unload vehicles and each vehicle is covered under a maintenance agreement from Atlantic Forklifts Ltd Hire Contract Contract No 1080.

The site has a Transport Manager who is contacted in the event of a breakdown. Vehicles are not left unattended as the deliveries are located close to the site.

The site is currently BRC S & D accredited, site code 5198190, expires 1/8/16.



NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 23 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



Details of non-applicable clauses with justification	
Clause reference	Justification
4.3.5	There are no high risk areas on site.
4.3.6	There are no high care areas on site.
4.3.7	There are no ambient high care areas on site.
4.4.4	There are no high care or high risk facilities on site.
4.4.13	There are no high risk areas on site.
4.7.5	There are no high risk or high care areas on site.
4.8.4	There are no high risk areas on site.
4.8.5	There are no high care areas on site.
4.9.4.1	There are no products packed into glass or other brittle containers.
4.9.4.2	There are no products packed into glass or other brittle containers.
4.9.4.3	There are no products packed into glass or other brittle containers.
4.10.1.2	There is no foreign body detection or removal equipment on site.
4.10.1.3	There is no foreign body detection or removal equipment on site.
4.10.1.4	There is no foreign body detection or removal equipment on site.
4.10.2.1	There are no filters or sieves in use.
4.10.2.2	There are no filters or sieves in use.
4.10.3.2	There are no metal detectors or x ray equipment on site.
4.10.3.3	There are no metal detectors or x ray equipment on site.
4.10.3.4	There are no metal detectors or x ray equipment on site.
4.10.3.5	There are no metal detectors or x ray equipment on site.
4.10.4.1	There are no magnets in use.
4.10.5.1	There is no optical sorting equipment on site.
4.10.6.1	There is no packing into glass jars, cans or other rigid containers.
4.10.6.2	There is no packing into glass jars, cans or other rigid containers.
4.11.7.1	There is no CIP.
4.11.7.2	There is no CIP.
4.11.7.3	There is no CIP.
4.15.4	There is no CA storage available on site.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 24 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: : Victoria Price

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If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com



5 Product control

5.1 Product design/development

The site has a management of change policy – Issued 1 14/2/06 There are no restrictions to the scope of product development. The site has introduced herbs in the last 12 months.
The change policy requires the HACCP to be reviewed. Evidence of this being undertaken was noted when the HACCP was reviewed. There are no product formulations or manufacturing of products.

Standard procedures would be used .
The site would undertake shelf life trials in line with documented current procedures.
Product Labelling

5.2 Product labelling

Products are labelled with the product, DU date, origin, class, variety, Class markings, Defra code – Potatoes (Class 1 stated).

Product is booked out of stock into pre-pack and labels generated based on product from stock. The country of origin is reviewed for each packing run.

There are no products designed to enable a claim to be made to satisfy a consumer group.

See N/C 5.2.1

5.3 Management of allergens

The management of allergens is covered in the HACCP plan. The site has included reference to allergens handled on site, which include celery within the pre-pack area and sulphur pads, milk, eggs and nuts within the storage and distribution part of the business. The site has undertaken a material risk assessment and has taken account of the potential routes of contamination which include spillages, breakages employees and poor stock control.

See N/C 5.3.4

5.4 Product authenticity, claims and chain of custody

The site remains up-to-date with the latest information on food fraud and food authenticity through the their technical consultant and publications such as The Fresh Produce Journal.

The site has conducted a vulnerability assessment on each supplier. Suppliers have been graded based on the bullet points of clause 5.4.2. Scores have been weighted on a number of factors. The vulnerability assessment is a live document which is continually reviewed. There have been no materials identified as being at risk.

Labelling claims are made which include origin and variety. Each variety has a specific stock code which is used to allocate stock to the pre-packing operation.

There are no claims made about the methods of production.

5.5 Product packaging

Clear Film is in use is supplied by TREFAN evidence was available to demonstrate it meets FSA and EC regulations which includes specific German Food Commodity Act. Technical data for the 25mu centre folded polypropylene was available.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ

Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15

Page 25 of 28
Audit# - Customer#: 1539286 - C0302131

Auditor: : Victoria Price

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5.6.1 Product inspection and testing

The site has a documented product testing procedure CP017. No processing is being undertaken. There is no pesticide or microbiological testing undertaken. All stock is physically checked on a daily basis. The site relies on the testing undertaken by the suppliers through their third party accreditation for example BRC/GLOBAL GAP/Red Tractor.

The site regularly reviews the RASFF database to check for withdrawals and recalls and receives the FSA updates.

The site has a process and shelf life validation procedure CP016. Daily checks are undertaken on stock on site.

See N/C 5.6.1.3

5.6.2 Laboratory testing

There is no pathogen testing conducted and no routine testing laboratories present on site.

5.7 Product release

Positive release procedures are available if required. The procedures are implemented upon customer request.

Details of non-applicable clauses with justification

Clause reference	Justification
5.6.2.2	There are no routine testing laboratories on site.



NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 26 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



6 Process control	
6.1 Control of operations	
<p>The site has documented procedures available and examples were reviewed for Quality Control CP023 and the procedure for lot coding and traceability CP020.</p> <p>There are no in line monitoring devices and no processing undertaken on site.</p> <p>In the event of equipment breakdown the site has call out procedures and agreements were reviewed for vehicle equipment breakdown and coldstore breakdown.</p> <p>See N/C 6.1.1.</p>	
6.2 Labelling and pack control	
<p>One batch of labels is taken to the line at the point of packing. There are two styles of generic labels in operation. Off line printing is undertaken by the Production Manager.</p> <p>Labels are printed to order (exactly). In the event of surplus labels being present or not enough for the production run and investigation is undertaken. One product line labelled at a time by two designated people. Labels are printed to order and therefore there are none left over. Details of number printed are recorded on the label sheets. There is no online vision equipment in use.</p> <p>See N/C 6.2.3</p>	
6.3 Quantity, weight, volume and number control	
<p>Product is sold by minimum weight or by count. Any product sold in bulk is sold business to business and is not sold in a final retail pack.</p>	
6.4 Calibration and control of measuring and monitoring devices	
<p>Refrigeration equipment listed on a spreadsheet and scales are listed on the inspection documents.</p> <p>All calibration seen was traceable to a recognised standard. Results were available for review and included scales s/n 131260964, 131260968 and temperature probe RC6161801.</p> <p>Reference measuring equipment was calibrated and traceable to a recognised standard.</p> <p>Any defective equipment is removed from use, repaired or replaced.</p>	
Details of non-applicable clauses with justification	
Clause reference	Justification
6.1.4	There is no processing undertaken on site.
6.2.4	There is no on-line vision equipment in use.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 27 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price



7 Personnel

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

The site has a training procedure CP002 issued 1/3/07 which states that training is reviewed on an annual basis to identify training needs. All staff are provided with basic induction training within 1 week of starting. Site training includes introduction to operations, vehicle and warehouse cleaning, delivery rules, HACCP, temperature control, stock management and rotation, non-conformance reporting, complaints handling.

Job descriptions outline the key competencies for specific roles. Training records were reviewed for Gill Van Boyd (Packer) and Paul Moulding (Pre-Pack Manager).

Training records dated 17/6/14 for Basic food hygiene, pest control personal hygiene, general cleaning, cleaning after maintenance, complaints and customer feedback, allergens handling and segregation had all be covered.

External training documentation is also retained and was reviewed for HACCP awareness for Gillian Van Boyd.

Training is undertaken in English as all staff are English.

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

The site has a personal hygiene policy which has been signed by Gill Van Boyd – 19/12/13 and Paul Moulding on 13/2/14.

The site issues blue plasters for employees and visitors to use to cover small cuts and grazes. There is no metal detection equipment in use.

General personal hygiene policy states that personal medicines are not permitted in the packing and storage areas.

7.3 Medical screening

The site has a medical declaration which employees and visitors are required to complete on arrival. Completed examples were reviewed for Gillian Van Boyd 19/12/13 and Paul Moulding 16/12/13. The site has a return to work procedure for unplanned absences documented in the training for food handlers. Further guidance is sought from a local GP if necessary and if appropriate the employee/visitor is referred back to their own GP.

7.4 Protective clothing: employees or visitors to production areas

Protective clothing requirements are documented in the essential training for food handlers and Sharrocks personal hygiene policy. Protective clothing includes a disposable apron, hairnet, gloves and high visibility jacket. Protective clothing is to be worn in the open food handling and packing areas only. Protective clothing is disposable. There are no high care or high risk areas on site. Blue disposable gloves are in use on site. Food contact declarations was stated on the outer box.

NSF Certification UK Ltd, Long Hanborough Business Park, Long Hanborough, Oxford, OX29 8SJ		
Issue ref: NSF BRC Food RF25 - Issue 17 30-06-15	Page 28 of 28 Audit# - Customer#: 1539286 - C0302131	Auditor: : Victoria Price