

# Audit Report

## Global Standard for Agents and Brokers Issue 2: August 2017

1. Audit Summary			
Company name	Direct Sourcing Ingredients Ltd	BRC Site Code	1404801
Operation	Agent & Broker		
Services	Storage Distribution Importation Export Select a service Select a service Select a service Select a service Select a service		
Scope of audit	Agent & Broker - Importer / Exporter of ambient, chilled and frozen food ingredients for further processing (including pet food production) these included nuts, dried ingredients, plant-based oil, frozen prepared veg, dairy and pasteurized egg, containers of fruit concentrate. Products delivered direct to customers or via subcontracted storage & distribution.		
Exclusion from scope	None		
Product categories	1 - Chilled and frozen food 2 - Ambient food Category Category		

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Audit frequency	12 months	Audit finish date	2020-02-28	Re-audit due date	2021-02-28
Previous audit grade	B	Previous audit date	2019-02-28		

Voluntary modules included		
Modules	Result	Details
Choose a module	Choose an item	

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Number of Non-Conformities	Critical	0
	Major	0
	Minor	9

**3. Company Details**

Address	1st Floor, Chancery Lane, Retford, Notts DN22 6DF		
Country	UK	Site Telephone Number	01777710565
Commercial representative name	Sam Armitage	Email	sam@direct-sourcing.co.uk
Technical representative name	Steve Spencer	Email	steve@direct-sourcing.co.uk

**4. Company Profile**

No. of employees	10	No. of suppliers of products/services	150	No. of product categories traded	7
Other certificates held	None				
Product recalls in last 12 Months	No				
Regions actively exporting to	<b>Europe</b> Choose a region Choose a region Choose a region Choose a region Choose a region				
Regions actively importing from	<b>Asia</b> <b>North America</b> <b>Europe</b> <b>MiddleEast</b> Choose a region Choose a region				
Major changes since last BRC audit	Technical Assistant appointed 2019				

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Company Description

The company was established 2013 specialising in the supply of food ingredients to manufacturers including pet food production. Products supplied include ambient nuts, dehydrated fruits & vegetables, frozen fruits & vegetables, bakery ingredients, chilled liquid eggs & cream; sourced from Europe, Asia, America and the UK. The majority of the products are delivered in bulk directly from manufacturing sites to customers with some products via the company's third storage and distribution contractors. The company also provides commission-based order services as when required. The company has been trading from its current office in Retford for 30 months and employs 10 staff. Turnover was £8M in 2019.

**Audited Location**

Site Name	Country	BRC Site Code
Direct Sourcing Ingredients Ltd	UK	1404801

**Additional Locations**

Site Name	Country	BRC Site Code

**5. Audit Duration Details**

On-site duration	13 man hours
Reasons for deviation from typical or expected audit duration	Wide range of products and HACCP documentation was extensive

**Audit Duration per day**

Audit Days	Audit Date(s)	Audit Start Time	Audit Finish Time
1	2020-02-27	09.00	17.30
2	2020-02-28	08.00	12.30

**6. Key Personnel**

Auditor Number	132071	Auditor Names and roles	Stephen Kolek - Auditor
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Present at audit			
Note: the most senior manager on site should be listed first and be present at both opening & closing meetings:  Name / Job Title	Opening Meeting	Procedure Review	Closing Meeting
	Mat Armitage / Managing Director-Accounts	X	X
Sam Armitage / Managing Director - Sales		X	X
Steve Spencer / Technical Manager	X	X	X
Barbara Nalezinska / Technical Assistant	X	X	X

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**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

**Minor**

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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	1.1.1	At Induction new staff have a documented Induction program and also sign to acknowledge policies in the staff handbook however neither of these 2 documents include the Quality Policy	Briefing conducted for the current employees to remind them about the Quality policy and that the policy is displayed on the wall next to the main office. TP08- Induction Checklist v2 updated. to include a sign off for the Quality Policy	Root cause- Policy displayed taken as sufficient but no confirmation of understanding.  Key Policies added to induction checklist.	Updated induction checklist, TP08- Induction Checklist v2  Briefing signature sheet  Confirmation of telephone brief from employee based in Poland	2020-03-27	Stephen Kolek
2	1.1.2	Not all the KPIs have targets or clear measures of success	Additional MRM conducted on 09-03-20. New targets have been set with the individual timeframes included and the previous meeting actions has been reviewed	1.As the business undertakes 6 monthly reviews the targets had been considered as with a six-month time frame. 2.Amended MRM has set individual timeframes for each target. Pre prepared agenda to be used going forward.	MRM minutes attached in new agenda format	2020-03-27	SK
3	1.1.3	Minutes from the MRM Meeting 28/01/20  a) did not follow the Agenda stated on the FormTP10a e.g. no record at this meeting about	1.TP10a MRM agenda reviewed and updated. 2.Additional MRM conducted on 09-03-20 (agenda followed) and the supplier	Previously supplier performance monitoring was mainly by complaints, so this has been recorded as the review of the complaints.	TP10a MRM updated agenda  09-03-20 meeting minutes	2020-03-27	SK

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		supplier performance  b) There was no evidence that the MRM meeting was used to revise the objectives encouraging continuous improvement	performance has been reviewed. 3.The targets from the previous meeting have been reviewed to encourage continuous improvement. New targets have been set.	TP10a - MRM meeting agenda v1 now amended to ensure that supplier performance is reviewed separately, looking at food safety/ quality and the other issues.	attached.		
4	2.7	The Pre-requisite program on TP05c included Traceability however the Hazards were not clearly identified in relation to the listed controls	TP05c re structured to link hazards to controls	1.Review HACCP risk process flow to make more relevant to the business.  2.Review HACCP risk assessment to reflect the AMENDED FLOW. Review all relevant procedures to ensure they reflect the amended HACCP risk process	Amended TP05c	2020-03-27	SK
5	2.11	HACCP Review- the TP05 document does not include the requirement to Review when a new service is introduced or following a product Recall	TP05 amended to include these items into the review process (section 14).	TP10c HACCP review template created as a control document to standardize the review process.	TP05 - HACCP Food Safety v3  HACCP review 20200303 minutes	2020-03-27	SK
6	3.5.1	The Internal Audit schedule did not include the Procedure for nc product	Added to schedule	Procedure amended to indicate audit planning to also reflect global food safety standards	TP12 - Internal Audit Procedure  TP12a Internal Audit schedule	2020-03-27	SK
7	3.5.2	The auditor for IA Traceability 09/10/19 was MA who was not an appropriately trained auditor.	Audit report amended, as the internal Audit was conducted by BN and	Pay more attention to the details and be more careful when completing paperwork. MA now	IA report.  MA training	2020-03-27	SK

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			MA & Sa were the auditees	trained.	report		
8	3.11.3	The Incident Management Procedure TP04 includes a section for review however the Incident forms do not have anywhere to record review after a Recall or Test of the Recall systems	TP04 amended to include a review record (page 9)	Review embedded into the procedure with a document in place to record the process as a part of following the procedure through in the event of an incident.	TP04 - Incident Management Procedure (inc Recall) v7	2020-03-27	SK
9	5.1.2	There is no documented training procedure and documented training records to demonstrate that the training is appropriate and effective	'HR011 Appraisal Procedure' introduced supported by 'HR011a Performance Appraisal and PDP v1' to record the event.  Appraisal process started	Procedure and documentation put in place. Integrated into training matrix to track events	HR011 Appraisal Procedure  HR011a Performance Appraisal and PDP v1  Appraisal record BN 03-2020 Performance Appraisal and PDP_v1  Appraisal record SS 03-2020 Performance Appraisal and PDP_v1	2020-03-27	SK

**Comments on non-conformities**

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## Voluntary Module Non-Conformity Summary Sheet - FSMA Preparedness (Module 6)

Critical			
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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

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Minor							
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# Detailed Audit Report

## 1. Senior Management Commitment

### Summary

Food Quality Policy in place CP04 v4 30/1/20 signed by Mat Armitage MD and visible on the wall in the corridor to office.

MRM meeting every 6 months Last was 28/01/20 using TP10a.

Review of KPIs from previous meeting (19/09/19)

Complaints summary 2019 45 compared with 22 for 2018 , doubling of turnover, no underlying trend; 6 suppliers with 2 complaints, 3 with 3 complaints, 1 with 4 complaints (no longer used) and 1 with 7 complaints.

Other items Business location/ practices/location; nc's; Internal Audits; HACCP; Food Defence/TACCP/VACCP.

There are Sales meetings approx. weekly- seen at audit 14/1/20 which included a presentation by Technical Assistant of the Targets from the MRM

The company have systems to ensure issues are brought to attention e.g. e-mail SS to all 05/2/20 Updated UK Import instructions Turkey & China feature highly. The company are kept informed on emerging issues via FSA, EU Rapid Alert, 3 customer's Codes of Practice, AB World.

The company with registered with Basseylaw District Council, North Nottingham as a Food Business Operator. Letter on file from the council 26/09/2018 for site visit 25/09/2018 (852/2004), ref. 111573 The company have a pdf copy of the BRCGS A&B iss 2 Standard.

The opening & closing meetings were attended by Directors.

The 15 minor nc's raised at the previous audit were checked and suitably closed.

The organisational chart was detailed in CP06 26/02/20 with 10 people and identifies role cover. JD for the Technical Manager signed 07/07/18 includes liaise with regulatory bodies, implement HACCP system, RA of all material suppliers, specifications.

JD for Technical Assistant signed 01/07/19 includes compliance documentation, customer issues and enquiries, report potential threats to managers

See minor NC 1 (1.1.1) At Induction new staff have a documented Induction program and also sign to acknowledge policies in the staff handbook however neither of these 2 documents include the Quality Policy

See minor NC 2 (1.1.2) Not all the KPIs have targets or clear measures of success

See minor NC 3 (1.1.3) Minutes from the MRM Meeting 28/01/20a) did not follow the Agenda stated on the FormTP10a e.g. no record at this meeting about supplier performance) There was no evidence that the MRM meeting was used to revise the objectives encouraging continuous improvement

### N/A Clauses

<u>No.</u>	<u>Justification</u>

## 2. Hazard and Risk Assessment

### Summary

HACCP Team led by Technical Manager SS (Level 3 HACCP certification with Virtual college 08/03/19 21 years' experience in Food Manufacturing ) other members are Technical Assistant NB(Level 3 HACCP Training virtual college 05/12/19) and 2 Directors MA (L2 02/02/20 and Food Industry experience),SA (Refresher HACCP Training on-line).

TP05 is 2 08/03/19 has a scope sourcing, transportation, storage and delivering of preserved food ingredients. The document starts with sourcing and ends with delivery of ingredients to customer. Origin of ingredients- physical or chemical properties (pH, Aw); Treatment and processing; packaging system; S&D; target shelf-life; Instruction for use. Use of latest scientific, historical, C of P, guidelines- legislation from production and sale, customer requirements. Intended use- A7B supply chain does not expose a risk- For purpose of HACCP products are initially mapped against prepared generic standards – if characteristics do not match these standards then product is subject to individual assessment.

RM016 is a template for types of processing of foods Risks and controls – Covers Blanching/freezing; Chemical treatment; chilling; drying; fresh; pasteurised; packaging. This covers the range of products traded e.g. pasteurised liquid egg; - all are considered low risk. Flow Diagram RM002 is 2/01/20 with steps 1.Raw Material sourced; 2.RFQ and supplier format specification requested; 3. Add info from RFQ form to DS Proposal to customer;4.Confirm RFQ meets Approved supplier requirements; 5. Supplier not approved; 6. Supplier meets approval; 7.Supplier NA submits evidence for approval; 8. NA Unable to supply adequate evidence; 9. DS Obtains quotes for transport/shipping; 11.Price checked, procurement processed, transport agreed. 14. Transport to port; 15. Dispatched from port via agreed shipping line; 16 Transfer to storage; 18. Customer confirms delivery, quantity, quality.

No CCP's

Document RM002a covers steps in the flow, identifies Hazards as F. body; Chemical; Micro; Allergens; Radiological with a Risk scoring system and links this with a TACCP covering supplier history, geographical consideration, Fraud, economic factors

Pre-Requisite Program TP05c 07/03/19 set out as PRP No./ Program/ Hazard/ Control and Monitoring/ CA  
Supplier Assurance Hazards: Stones; plastic; Pathogens in Egg; Introduction of pathogen during transport; Growth of pathogen due to Time/temp; Presence of radioactivity sourced from risk areas. Controls are Purchase from Approved; Raw Material RA VACCP/TACCP; Raw Material & Packaging spec; C of A; Audit of HR suppliers.  
Transport & storage Hazards- growth of pathogens, temperature abuse; introduction of physical contamination, dirt, broken pallets; chemical – food taint Controls RM011 Logistic approval procedure/RM010c Road transport Agreement

HACCP Review 06/01/20 Actions from previous Review 04/06/19  
Review of documents; Supplier authorisation – TP01 & TP02 still current; RM006 & RM007 amended to include Lab; TP11 Sale circulated Logistic discussion HACCP Flow RM002 still relevant RM006c for new products; RM019 RA VACCP and RM020 VACCP reviewed.  
Assessment of upcoming business no High-Risk ingredients.

See minor nc 4 (2.7) The Pre-requisite program on TP05c included Traceability however the Hazards were not clearly identified in relation to the listed controls

See minor nc 5 (2.11) HACCP Review- the TP05 document does not include the requirement to Review when a new service is introduced or following a product Recall



**N/A Clauses**

No.	Justification
2.2	Hazard and risk analysis not undertaken centrally

**3. Product Safety and Quality Management System**

**Summary**

The QMS is on computer, there is no printed version, all have access and access is controlled on drobox. There is a salesperson (on a retainer) in Poland who works from home and has access to QMS by request.

Technical Procedures are document controlled- SS, MA, SANB have access to a spreadsheet which lists Ref No./Sheet name/V No. date created/created by/V No. date amended/amended by/ details of amends. Checked at audit for RM002 22/1/10 and RM016 v2 24/07/19.

Documents are in English and document retention is for 3 years (max product shelf-life is 2 years). Records are on computer -Cloud based back-up to records – records from 3rd parties can be provided on request.

Internal Audit:

Schedule for 2020 Some are 2x year Supplier Approval PRPNo.1.1; Spec for Products PRP No. 1.2; RM RA PRPNo. 1.3. In 2019 covered all audits at least once GAP analysis of DS Procedures to BRC A&B review exercise 20/2/20

Auditors SS (IA Bakkavor 12 Feb 15); BN (IA 2 Sisters 17/1/19) ; HG;GL;SA

Training record seen for GL 10/11/19 IA on-site training; Training by BN (training Mango downloaded PowerPoint) Conducted 1st IA 10/11/19 with BN.

Examples of IA SA 06/2/20 Document Control no nc's ; HG 13/12/19 Customer Complaints no nc's IA Security 23/09/19 by SS no nc's; IA Fraud 22/11/19 by BN no nc's

GL 10/11/19 Allergen control 1 nc 20191110

From 2020 IA Checklist and Report TP12c 13/12/19 format is a blank template drop BRC A&B Standard into LH side, document audited in middle and RH side for comments. At the bottom is nc list with nc No. brief description major/minor/recommend and person responsible.

CA Format nc from report is added to Template TP17 is 1 08/08/18 seen for 10/11/19 Report 20191110 GL Allergen control nc soya isolate spec from S\*\* Oils not signed by DS; Details of CA SS; Closing down date 13/11/19 signature added

Specifications-Dependant on customer either use the original suppliers spec or a modified suppliers spec (remove supplier's id) Sales procedure TP11 i4 12/6/19 and TP11a flow chart – customer to sign off-agree spec. There is a log of specifications List of suppliers- products. Unique product No. and DS No. valid date V is logged and has a review date- cells go red on the day they go out of review. Seen at audit specs for

1. IQF Red Onion sliced – Polish supplier Fr\*\* spec in Polish and English Document 07A/Z02/P08 Date of issue 08.07.19 spec includes appearance/colour; micro; nutrition; packaging; labelling; distribution and transport at -18C;Approval by S.Spencer 29/07/19 with statement “please note that this will be considered accepted after 3 weeks if no signed copy of the spec is received”.

2.Walnut light pieces supplied by F\*\* Y\*\* R\*\* Food Co Ltd origin China, vacuum packed in 12.5Kg 12-month shelf-life spec gives chemical analysis and micro – aflatoxin signed SS 15/01/19

3. De-hydrated carrot (Pet Food) spec KFLV163 K\*\* F\*\* Ingredients China; pesticide as per EU, shelf-life 24 months signed SS 15/01/19

4. D McD\*\* Lemon comminute 17 Brix Code 100105 Shelf-life 3months stored <20C or <10C , 6



months stored 0-5C; Allergen, intolerance colours, HACCP CCP's Nutritional , safety data signed SS 10/06/19 Rapeseed Oil K\*\* 013-3B 15 May 18 Country of origin EU signed SS 15/01/19

6. Pallecon of Liquid egg – Supplier F\*\* shelf-life 10 days from production store chilled 0-4C signed SS 31/1/20

Traces at Audit

1. Walnuts to AIB\*\* in Jan 2020

e-mail 18/11/19 quote to customer 8mT 20% ; 6mT 60%; 6mT 80%

Response by e-mail 18/11/19 confirming; Order 3041 to supplier F\*\* Y\*\* R\*\* Food Co18/11/19

Shipped by producer to Felixstowe in ship container

Transport It 1 (arranged through DS) picked up from Felixstowe sealed container MNBU 3720522

25,930Kg on 31/1/20 to AIB\*\* Wolverhampton – empty container returned to Felixstowe

Invoice to AIB\*\* Food 4856 on 31/1/20 for Walnuts 8mT 20% ; 6mT 60%; 6mT 80% as on the Order.

2. Egg – PO43577 03/10/19 Delivery to W\*\* B\*\* Co Galway for delivery date 14/10/19

Supplier ID 86 DS Product code CL1Q021 Liquid whole egg 1,000Kg x8

DS PO to O\*\* Farm Eggs Telford DS2835 14/10/19 8x Liquid egg 1,000Kg

Delivery note Frampton's Transport (Transport is McCulla Ireland- collect from Framptons deliver to W\*\* B\*\* Co Galway Ireland) McCulla Ref. 926294 8 units delivery 14/10/19

Goods delivered signature

Invoice DS to W\*\* B\*\* Co Galway 4332 14/10/19 Order 43577 delivery 14/10/19 8x Liquid egg 1,000Kg

3. Onions F\*\* e-mail 26 Nov 19 Quote for mixed onions

Customer Order No. PO111556 for mix load as in quote – reply by e-mail 26/11/19

PO from DS to supplier Fr\*\* 26/11/19 Order No. 3092 as per quote

CMR Collection from supplier Fr\*\* to Dundee cold Store (sealed bags) – stamped by Dundee Cold Store 05/12/19

DS Invoice customer Ma\*\* 11/12/19 for quantities as per quote Internal Audit by MA 09/10/19 TP11

Sales processing – documents SA Customer order, POD, Quantity Looked at Rice flour 2515 PO

2552 and PO2553 29/7/19 customer PO 05/06/19 Trace within 4 hours no nc's

IA SS 01/03/19 TP11 Sales SO2366 mushroom crumb 900Kg stock records from Ice Co- checked Bulk in and then stock movements out until no stock left

Complaints procedures detailed in document TP03 procedure covered complaints log, types of complaints, investigation, trending and review. A process flow diagram was included in the procedure from customers are logged into the database.

Complaint example seen Mackle Pet complaint FB Blue Plastic 21/01/20 Logged as 20200121

Product Potato flake 20Kg Batch KX074 use by 13.01.10 Investigation by supplier – folder of e-mails on complaint. DS send findings to customer (with CA &PA) Complainant not happy with response. DS asked manufacturer to do more investigation – cannot identify F. body in plant.

Mackle carried out refresher training to staff in closing bags. Tracker on completion >30 days – recorded.

Trending of customer complaints Review at MRM 28/1/20 Complaints summary 2019 45 compared with 22 for 2018, doubling of turnover, no underlying trend; 6 suppliers with 2 complaints, 3 with 3 complaints, 1 with 4 complaints (no longer used) and 1 with 7 complaints.

CA Format nc from report is added to Template TP17

Product Recall procedure included in Incident Management Procedure TP04 14/01/20 – Managing Director & Technical Manager to determine and define incident category. Procedure included emergency contact details for the recall team and external agencies and referred to RM001 approved supplier's list for their contact details. The procedure required the certification body to be informed within 3 days of a recall being issued. Responsibilities included in the procedures -





Managing Director to inform customers and through incident team co-ordinator to locate stock in 2 hours. A checklist was included in the procedure including stock return information, stock disposal information. There has been no product recall in the last 12 months.

Annual Challenge- last Test of Recall 19/09/19 using template TP04 scenario was F. body on Turmeric Batch 26457- timescale of incident, notification record, customer, local authority numbers confirmed.

See minor nc 6 (3.5.1) The Internal Audit schedule did not include the Procedure for nc product

See minor nc 7 (3.5.2) The auditor for IA Traceability 09/10/19 was MA who was not an appropriately trained auditor.

See minor nc 8 (3.11.3) The Incident Management Procedure TP04 includes a section for review however the Incident forms do not have anywhere to record review after a Recall or Test of the Recall systems

**N/A Clauses**

No.	Justification

**4. Supplier and Sub-contracted Service Management**

**Summary**

Supplier Approval Procedure RM006 v5 30/09/19 details risk categories for ingredients – definitions High Risk – post pasteurisation could be contaminated with pathogens or Allergens.

Low Risk 1- pH or aW not capable of supporting growth of pathogens- no micro risk

Low Risk 2 – processed in final packaging to acceptable level.

All HR ingredients must have a physical audit prior to approval and prior to use- carried out by a 3<sup>rd</sup> party auditor- re-audit at agreed frequency. Currently DS has no HR Suppliers. Procedure for LR Suppliers – approved by SAQ or by 3<sup>rd</sup> party audit, where a Lab is used it is listed on RM001.

Non- approved suppliers by concession- only when a customer agrees, written agreement from customer clearly stating product spec and full suppliers’ details, customer takes full responsibility and full trace is obtained.

There is a database of suppliers listed as Supplier name/contact details/ 2ndary name or supplier site/ supplier RA/ Lab/ Logistic method/ RSPO/ Additional certificate/ Sedex/ BRC GFSI/Cert date/supplier authorised date. Examples of supplier approval reviewed during the audit included:

Fr\*\* IBW supplier for Frozen onions, Low Risk, Lab is Hamilton Poland, Suppliers chosen logistic; BRC Food Grade A site 8975763 with report expiry 10/1/21 Reviewed 29/07/19 plus audit 19/11/19 SAQ assessed by Technical Manager (SS) 29/07/19 signed by Fr\*\* 26/07/19.

F\*\* Y\*\* ,supplier of walnuts Low Risk, CNAS L0093 Internal Lab, BRC Food Grade B site 8021403 expiry 10/08/20 Reviewed 22/8/18 SAQ assessed by Technical Manager (SS) 24/08/19 supplier signed 22/08/19

Fram\*\*, Low Risk, supplier of pasteurised liquid egg, Lab is Intertek UKAS 1262, BRC Food site code 1318829 expiry 20/3/20 Reviewed 28/1/19 SAQ assessed by Technical Manager (SS) 30/01/19 signed by supplier 28/01/19

Update on BRC Certificates yearly, SAQ every 3 years.

Agents & Brokers: only use BRC certificated A&B e.g. Ch\*\* Foods BRC site code 8984586 Cat 2 expiry 04/08/20 supplier of figs.



Logistics & Service Approval Procedure- All logistic suppliers for High Risk ingredients must have a physical audit prior to approval and prior too using. For LR ingredients SAQ (same format as for ingredients) or 3<sup>rd</sup> party audit- 3<sup>rd</sup> party certificate to be obtained. Approval formally noted by signature and date. List of Approved Service Suppliers is in the same format as for Ingredients with same concession for non-approved suppliers. Examples seen at audit:

P\*\* G\*\* Chilled used for Chilled BRC S&D site code 1645745 expiry 27/06/20 scope is ambient and chilled; SAQ signed by Technical Manager (SS) 27/06/19 Specification signed 11/04/19

The I\*\* Co used for frozen BRC S&D site code 1768097 expiry 21/11/20 scope chilled and frozen SAQ signed by Technical Manager (SS) 27/06/19 Specification with T&C's signed 11/02/19

Loco\*\* used for many years to transport onions into UK SAQ signed by Technical Manager (SS) 19/09/18 Contract includes security and sub-contracting of haulage signed 05/02/19

Supplier Approval Procedure includes Laboratories- If a Lab is used the Lab is to be accredited, Where the customer requires a C of A then use the suppliers C of A and the specification includes C of A from supplier.

The suppliers carry out any testing Direct Sourcing Ingredients do not test any products. Finished products were labelled with product name, weight, country of origin, lot/batch, shelf life. Customers may be contacted if requiring any specific information on the label e.g. a pet food manufacturing customer who sent an example of label required; the information was obtained by the Technical Manager and forwarded to the relevant Sales representative. All products supplied in bulk for further processing, no retail packs or retail customers

Vulnerability assessments conducted (RM002a Direct Delivery; RM018a Indirect Delivery) information sources FSA, Europa database (monthly spreadsheet for Food fraud, risk information and checks) The company have systems to ensure issues are brought to attention e.g. e-mail SS to all 05/2/20 Updated UK Import instructions Turkey & China feature highly.

VRA considered Supply chain complexity, Audit strategy, Supplier relationship, Supplier history, Testing, Quality, Geographical, Fraud, Economic.

**N/A Clauses**

No.	Justification
4.6	No NPD.
4.7	No positive release.
4.9	Surplus products not handled.

**5. Personnel**

**Summary**

Training and Development Policy v1 12/12/18 lists aim and objectives, roles, responsibilities and evaluation. There is a matrix of list of staff and training (JD, Hygiene, Induction) IA on training completed by BN 10/1/20. Examples of Training seen:

Technical Assistant BN Joined DS Sept 2019 Basic Food Hygiene and Allergen training 11/09/19 Induction 6-month review 03/2/20 signed off by Technical Manager.

GL Sales Account Induction program 03/04/17 Staff Handbook- GL acknowledged 07/02/19



See minor nc 9. (5.1.2) There is no documented training procedure and documented training records to demonstrate that the training is appropriate and effective

**N/A Clauses**

No.	Justification

**6. FSMA Preparedness Module**

**Summary**

**N/A Clauses**

No.	Justification

