

Audit Report

Global Standard for Agents and Brokers Issue 2: August 2017

1. Audit Summary			
Company name	Premier Fruit and Nut Ltd	BRC Site Code	1219216
Operation	Agent		
Services	Storage Distribution Importation Export Repacking Further processing	Product categories	2 - Ambient food Please select Please select Please select
Scope of audit	Agent for dried fruits, nuts (raw and roasted), snacks, seeds and bird foods. Additional services of import and export to manufacturers and packers. The management of services relating to storage and distribution and repacking and further processing as required.		
Exclusion from scope	None		
Audit Start Date	2022-02-02	Audit Finish Date	2022-02-03
Re-audit due date	2023-02-06	Audit frequency	12

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Blended Announced
Certificate issue date	2022-02-11	Certificate expiry date	2023-03-19		
Previous audit grade	AA	Previous audit date	2021-01-28		


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

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Number of Non-Conformities	Critical	0
	Major	0
	Minor	4

3. Company Details			
Address	56-59 Leslie Park Road, Croydon, Surrey, CR0 6TP		
Country	United Kingdom	Site Telephone Number	+44 20 8676 1533
Commercial representative name	Rajeev Shah	Email	raj@premierfn.co.uk
Technical representative name	Ajay Shakya	Email	ajay@premierfn.co.uk

4. Company Profile					
No. of employees	8	No. of suppliers of products/services	64	No. of product categories traded	1
Other certificates held	None				
Product recalls in last 12 Months	No				
Regions actively exporting to	Europe Choose an item. Choose an item. Choose an item.	Regions actively importing from	Asia Europe North America South America Africa		
Major changes since last BRC audit	None				
<p>Company Description The company was started in 1986 by Narendra and Minaxi Shah, it is still family owned with three family members being Directors. Mainly importing Dried nuts 90%, Bird food 5%, dried fruit 4% and snacks and dried seeds 1% respectively from USA and the EU, but also China, Vietnam, India and South America. The company offers storage in both the UK and the EU. There is no branding. Products are sold to manufacturers for further use or packing mainly in the UK and the rest of Europe and either delivered direct or stored in a 3rd party warehouses. Contract services offered include repacking, cleaning and fumigation or freezing however these have rarely been use in the last 12 months. There are 133 suppliers and 9 service providers (site has worked to rationalise their supplier lists and have reduced the</p>					

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4. Company Profile

number of active product and service suppliers to 64 in total).
This audit has been completed as blended announced using MS Teams.

Company Locations

Site Name	Country	BRC Site Code	Audit Type (in person/remote)
Premier Fruit & Nut Ltd	UK	1219216	Remote

5. Audit Duration Details

On-site duration	9 man hours
Reasons for deviation from typical or expected audit duration	Less time required due to the efficiency of the site to gather the documentation and the speed of the traceability exercises completed.

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2022-02-02	09:00	14:15
2	2022-02-03	09:00	12:30

6. Key Personnel

Auditor_number	Name	Role
21286	Alison Fox	Lead Auditor
N/A		Please select

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
Rajeev Shah – Director / Trader	X		X
Ajay Shakya – Technical Manager	X	X	X
James Taylor – Shipping Manager		X	X
Naresh Shah – Director/Trader			X
Sergiy Shpektorov – Logistics Manager			X

Template control	Agents & Brokers	Version	1.0
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Non-Conformity Summary Sheet

Critical			
No.	Clause	Detail	Ant. Re-audit date

Major							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	1.1.12	The sites culture plan lacks timescales and is not clear what	The site culture plan has been rewritten	The culture plan will be reviewed on annual basis on first year and will be	Culture plan started but not	2022-02-08	AFox

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Minor							
		actions will be taken on some objectives.	with clear deadline and action plan	reviewed every 2 years going forward. This will be updated in technical calendar to ensure they are reviewed as per plan.	completed. Evidence 1.2.5 - Food Safety Culture Plan – 2021		
2	3.6.4	The specification from one of the traceability exercises (Argentine groundnut kernels) had not been reviewed since 12.12.13.	The updated specification was immediately received during the audit from the supplier.	We are in process of updating/looking into the possibility to include the specification management system into iBridge which ensures spec are flagged when they are over 30months.	Specification will be flagged in the future. Evidence Email from the software developer Bird Feed Runner Peanut Spec_2021	2022-02-08	AFox
3	3.7.2	The traceability exercise completed before the audit did not show start and end times and therefore could not	Traceability exercise form has been updated and	We will write start and end time in Traceability top sheet and also get our	Form missing the date boxes since updated.	2022-02-08	AFox

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Minor							
		determine if it had been completed within the timescale.	included start and end time to ensure this has been completed within the timescale.	supplier to follow the same procedure to ensure they are completed within the time scale.	Evidence 3.7.2_Traceability Exercise Top Sheet V3		
4	3.7.4	The traceability test carried out on a non GFSI supplier showed records that did not match, and it was unclear if the exercise had been successful.	The first part of the traceability was completed at the time of approval in March 2021 (during the time of approval) and second part in Oct 2021. It appears that the supplier did not dispatch the same lot that the traceability was completed hence the record did not match.	The traceability exercise will be carried out on the lot that the supplier agree to supply us. This will be done for Non-GFSI supplier at the time of supplier approval.	Misunderstanding of the clause and updated. Evidence 3.7.1_Traceability Procedure V3	2022-02-09	AFox

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Minor							
			The traceability procedure has been updated to include the traceability exercise will be completed from farm all the way to at least once customer in future.				

Comments on non-conformities
None.

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

Critical			
No.	Clause	Detail	Re-audit due date

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Major							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Detailed Audit Report

1. Senior Management Commitment

Summary Section 1

There is a documented Food Safety and Quality Policy dated 11.11.21 signed by Director and Technical Manager. There are a total of 8 employees and the Quality Policy is trained to each employee and displayed on the noticeboard.

There are quality objectives which have been defined as:

- Maintain a food safety management system based on BRC agents and Brokers and work towards continual improvement of the system.
- To Maintain the number of food safety incidents to a level defined yearly by the HACCP team in the management review
- Other KPIs specific to each department, as defined yearly by the HACCP team in management review.

KPI's are communicated and monitored by Senior Management Team and reported at quarterly intervals.

Management review meetings are held quarterly and attended by 5 of the senior management team. The last meeting was held on 07.01.22. Previous quarterly meeting was on 6.10.21. The agenda includes:

- Review previous actions
- Internal and customer audits.
- Supplier performance and non-conforming products.
- Complaints and results of any customer performance reviews.
- Incidents / Corrective actions
- Supplier performance
- Food defence and authenticity review
- HACCP
- Resource requirements
- AOB

Actions from these meetings are raised within the summary and timescales are allocated. Meeting minutes include good notes and evidence of conclusions also. The team are also able to communicate daily when issues arise and nothing is left for the meeting, it is dealt with in a timely manner.

The site raises any food safety, quality, or legality issues via the Technical Manager. The resources required for implementation of this standard have been provided. Implementation and documentation of systems to comply with the BRC A&B standard have been initiated since the appointment of a Technical Manager.

The company are members of the International Nut Association and hold industry codes of practice. The site receive FSA Alerts and the Technical Manager checks the RASFF portal.

The company is incorporated as a private Limited Company, No. 2067461, dated 24/10/1986. The site is registered with Croydon Council, Company Ref 2067461, since 2014. The council have visited 21.8.18 to review documentation regarding the bird food that is imported from India and Argentina. Bird feed is supplied to manufactures for wild bird manufactures to end up in garden centres etc. No visits since. There is a visit planned for next week, recently notified by email.

The company have a genuine electronic copy of the BRC A&B standard which is held on the shared network and are aware that any changes to the standard are published on the BRC website. This is the 4th certification inspection. The site has resolved the root causes of the 4 minor non-conformances raise

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at the previous inspection.

The audit has been conducted within the sites re-certification window which is 09/01/2022 to 06/02/2022. A Company Director attended both the opening and closing meetings.

The company food safety culture plan 22.6.21 is in its infancy with details on the document named food safety plan. The plan includes a staff survey from March 2021 with results but the survey for 2022 is yet to be completed but not yet due until June 2022. Also the plan highlights the requirements for annual staff reviews and recognition programmes, feedback mechanisms, training review, teamwork, effective communication strategies and activities to demonstrate product safety standards.

See NC below

The company have an organisational chart ref 1.2.1 issued 7.2.19 and revision 2. The business is very stable. Responsibilities are defined within job descriptions. Deputies are clearly defined in the job descriptions and the organogram. This is a family company lead by the Managing Director supported by his wife the company secretary. The structure is flat with 6 reports.

The Director job description is signed 16.10.18, the role is deputised by the MD. Technical Manager job description started 03.08.18, he reports to any Director and is deputised by Director RS.

The employees have full access to the work instructions and procedures via the dedicated server. All employees interviewed appeared aware of their responsibilities. A backup copy is stored on an online and is supported by a server backup service.

1 minor NC has been raised in this section:

NC1 1.1.12 The sites culture plan lacks timescales and is not clear what actions will be taken on some objectives.

Non Applicable Clauses

Clause/Section Ref	Justification
	All clauses covered.

2. Hazard and Risk Assessment

Summary Section 2

The site has a HACCP plan in place 20.08.21 v8 covering the business operations.

There are a total of three persons on the HACCP team. The HACCP team leader is the Technical Manager (AS) and has level 3 award in HACCP for Food Manufacturing, dated 16/02/2017 and 12 yrs. food industry experience. The remaining members are Trader and Director RS – 31/10/2019- Level 3 award in Managing HACCP and the Shipping Manager JT Level 3 HACCP 22.10.19.

The plan has been created locally and has been authorised by a director, who sits as a member of the senior management and the HACCP team.

The scope of the HACCP plan covers premium quality dried fruit and nuts for both human and bird

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consumption and a small volume of Indian snacks (fried lentils and peas). The product descriptions have been grouped into five broad areas of Nuts (90% of business, includes 2% organic nuts), Bird Feed (5% of business), Dried fruit (4% of business), Seeds (<1% of business), and Snacks (<0.1% of business).

The company supply ambient tree nuts (mainly almonds, also cashews etc.), bird feed (mainly low-grade peanut, commodity), Dried fruit (apricots and coconut), Seeds (pumpkin and sunflower seeds) and snacks (fried lentils and fried peas) for further processing.

The HACCP Plan identifies that the products are not suitable for children under 3 years of age due to choking hazards. The plan also identifies that not all products are not suitable as Ready to Eat products and supplied as “ready to process”. The Bird food being sold is actually low-quality peanuts (high aflatoxin). Shelf life for most nuts is standard 2 years with seeds and snacks having a shelf life of 12 months.

There is a clear Process flow which incorporates all steps and services provided signed the HACCP team 20.8.21 and V8. The steps of the HACCP flow include:

- New supplier approval (sign contract).
- New product approval
- Order placement
- Product packing/ dispatch from supplier
- Transport
- Storage at 3rd party warehouse
- Dispatch to Customer
- Fumigation (carried out on Non-Organic infested material).
- Freezing (carried out on infested Organic product)
- Cleaning (of product where necessary)

The services including fumigation and cleaning have been included, these activities are only conducted if an issue has been identified, e.g. infestation of product. Products can be delivered directly to customers or via contracted storage and distribution to customers.

Hazards have been associated within each step and includes chemical, micro, physical, malicious contamination, fraud and allergens and steps for outsourced processing covering fumigation, cleaning and repacking hazards are clearly shown.

Appropriate hazards associated within supplier and service approval have been considered e.g., includes condition and security of vehicle and temperature control. Malicious tampering and product contamination, A documented risk analysis based on the HACCP flow has been developed. There are TACCP and VACCP risk assessments which trace the product throughout the chain.

A documented risk analysis has been developed scoring risk from 1-3. This includes a full likelihood by severity assessment. Anything high or medium risk is passed through the 5 step decision tree. There are a number of hazards assessed as high or medium risk however as they have been deemed to be controlled by pre-requisite program. No CCP’s have been identified. Where control is by supplier it’s ensured by 3rd party approval, mainly BRC/GFSI accredited. There are some suppliers who are approved via SAQ, (currently only one) this is based on risk assessment. The BRC/GFSI accreditation of processors is formally monitored and updated.

There are a total of 8 prerequisite programmes in place:

- procurement,
- traceability,
- transport,

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- stock management,
- staff training
- allergen control.
- Food Fraud (product adulteration of main product with another product of inferior quality).
- Malicious Contamination (malicious contamination with harmful object / chemical whilst on transport)

Most suppliers are approved to BRC Food V8 or other appropriate GFSI food safety standard with appropriate HACCP plan and product safety procedures. E.g., Subcontractor service provider performance criteria – BRCS&D for all applicable depots. Warehouses have controls in place to handle rejected products. Supplier or subcontractor issues are monitored via the complaints database. Specifications are in place and a certificate of analysis is required per delivery and may include a specific customer requirement. TACCP- production site and vehicle security, secure packaging, restricted access to PC systems.

The outsourced processors HACCP plan is held on site. Due to Covid 19 restrictions the company has not made many visits to service suppliers in the past year. Monitoring of the sub-contracted services is by complaints and non-conformances.

Corrective actions include: Raise complaint, discuss in senior management meeting and agree corrective action to be completed. This may and has included delisting of the supplier.

The HACCP review is conducted on an annual basis by the team and review notes detail the changes made and considered. HACCP last reviewed: 20.8.21, no items raised, no changes noted.

No non-conformances were raised in this section of the standard.

Non-Applicable Clauses

Clause/Section Ref	Justification
2.2	The HACCP has not been completed centrally but is a site-based exercise.

3. Product Safety and Quality Management System

Summary Section 3
QMS

The company have an established Quality Manual. The Quality Manual is held electronically in the format of the A&B v2 standard and is in English. The Quality Manual is located in the company's Y drive with access to all staff. The company uses Dropbox for storage of specifications, complaints etc. All procedures and work instructions are clearly legible and give clear guidance and are available in SOPS and work instructions.

IBridge is an IT system which logs orders and on which product can be traced. Orders/deliveries are also recorded on manual record cards which are completed with the following details:

- Lot number/BBE
- Weight
- Location Id

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- Supplier
- Rotation
- PIV (Purchase Invoice Number)
- Supplier Invoice
- Date, Invoice, Customer, Goods Out, Balance, Remarks.

The company has document control procedure, 3.2.1 6.8.18 v1 detailing that all documents are authorised by the Technical Manager. When there is a change to any document this is recorded. The company have a document log index 01/08/2018 v1 showing the correct versions of documents that are in use as seen during the audit. E.g., HACCP plan should be version 8 but showing as v7 in the log. Contract numbers start with P, non-forecast contracts start with L. All records reviewed as part of the audit were legible and maintained in a good condition. Records are retained for 5 years.

Customer Focus and Communication

Customers may inform the Traders or the Technical Manager of any specific requirements. The company ensure communication of customer requirements to suppliers by the Traders and the Technical Manager. Some customers do not have specific requirements and the majority of product traded is commodity product, the company does not deal with retailers. An excel sheet has been created for customers who have specific requirements, this lists the name of the customer and the requirements of that customer in order to approve supply, i.e., GFSI certification, Aflatoxin & Salmonella cert for each delivery etc.

Most customers take a single specific product which has been matched to the customer's needs. The company confirm and document the customer specific requirements by customer orders. The source processor of the product is confirmed on the accompanying certificate of Analysis. There is always a COA. There is an information pack which is a two page document outlining who Premier Fruit and Nut are as a company and what they can provide, this is provided to all prospective customers.

There is no requirement to confirm the name of any other agents in the chain, but the final packer/manufacturing site details are always provided.

Internal Audits

The site have an Internal Audit system based on the BRC A&B standard that was initiated in September 2018. A risk assessment to confirm the frequency has been conducted. All sections are audited once per year (scores of <7 from the RA are audited once per year and items receiving a score of >8 are audited twice per year. All sections were completed for 2021. A schedule for 2022 has been developed with audits spread across the year. This is an excel based document. There are at least 4 dates where internal audits are completed per year.

Internal audits reviewed:

- Section 2 – completed 1.7.21 by SS: 0 NCs raised.
- Section 3.3 – completed 7.10.21 by SS: 1NC raised and closed out now.
- Section 3.5 – completed 7.10.21 by RS: 1NC raised and closed out.
- Section 4 – completed 20.1.22 by SS: 0NCs raised.

The auditors have been trained and consist of the Technical Manager (AS) trained 30/9/16 BRC 3rd party auditor 30/09/16. All audits are now carried out by SS who has been trained 21/02/19 All Safe Internal Auditing. The other auditor is the Director (RS) trained 6/11/18. Very few non-conformances were noted being raised.

Specifications

There is an excel spreadsheet of active specifications, there are a total of 137 specifications listed. There are some dates of approval on the sheet but not on all of them. 70 different products were traded last year.

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The company have a specification system and generally the site adopts the supplier specification. The specs are authorised by the Technical Manager and loaded onto shared drive. On some occasions the company will send the customer their own format specification – this would be in the instance that they do not want to disclose who they have purchased product from – they will disclose the manufacturing site however not who they have purchased from, i.e., if purchased from an agent or broker.

The Technical Manager checks for 3rd party certification and spec before final purchase can go ahead. All specifications are reviewed by Technical Manager on a 3 yrs. basis where purchases of that product have occurred.

Specification and approval tracker is being used and this is transferring over to the IBridge system this year (2022).

Specifications reviewed include:

Raw Pistachio Kernels 7.1.19

Groundnut Kernels specification 12.12.13

See NC below.

Traceability

Traceability procedure in place, ref: 3.7.1, dated 04/12/18 and revision 2. The company can trace the product back to the last manufacturer and forward to the customer.

The company retain po, release, rotation numbers to demonstrate effective traceability, Information is stored on IBridge and there is also a manual stock card in place.

Two traceability exercises were conducted during the audit:

Product Selected: USA Pistachio Kernels PF304

A stock card is completed for each transactions and includes where the products was bought from, where it was sold to and mass balance.

Supplier Invoice

Quantity: 882 x25lbs

Product Ordered with Supplier

Landed (product physically in the warehouse in England)

Invoiced to Customer

Warehouse: MB

Start: 9:40 and finish 11:20

Supplied by: IFS expiry 23.7.22

COA provided by the Manufacturing Site.

Shipped documents.

Aflatoxin Summary:

The second:

Product Selected: Groundnut Kernels

A stock card is completed for each transactions and includes where the products was bought from, where it was sold to and mass balance.

Supplier Invoice

Quantity: 20x1250kg

Product Ordered with Supplier

Landed (product physically in the warehouse in England)

Invoiced to Customer

Warehouse: MB

Start: 9:40 and finish 11:20

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Supplied by: BRC 30.8.22
 Clearing agent.
 COA provided by the Manufacturing Site.
 Shipped documents.
 Aflatoxin Summary:

A traceability exercise was reviewed: conducted on NAM1164/1430
 Product packed: 8.3.21
 Product: Chinese Groundnut Kernels
 Forward Traceability
 Packed 23.2.21
 Quantity 700 x50lbs
 Stock received 19.4.21
 All product successfully accounted for.
 See NC below

Where a supplier has been approved based on a questionnaire, a legally enforceable contract or specification, or a historical trading relationship (instead of certification or audit), verification of the supplier's traceability system shall be carried out at the time of the initial approval of that supplier and then at least every 3 years. This was reviewed for: NAM S0001164/1430
 See NC below

Complaints

The company have a customer complaints procedure linked to the product recall procedure. All complaints are recorded on a database and given a unique reference number. Complaints arising with a service are also listed in the same database.

Complaints log in place which is managed on Microsoft Access.

All complaints are investigated and may be passed onto the supplier for investigation, supplier contacted, and response provided. Total of 15 complaints for 2021, 7 being foreign body. Examples seen during the audit and most relate to specification issues. 6.1.21, 3.3.21, 9.6.21 viewed.

Non conformances

Procedure 3.10.1, dated 30/10/18 V1 covers Corrective and Preventative Actions and Control of Non-conforming Product. Non-conforming product is logged on Corrective Actions database and are categorised as either Major or Minor. Hold & Release products are required to be stored in a dedicated hold area within the warehouses. Product is placed on hold until a decision is made. Food Safety issues are assessed by the Technical Manager (AS), and all Quality issues are assessed by the Senior Management Team.

Non-conforming product log in place, limited incidents of non-conforming product identified: the last occurrence was recorded on 23/09/20: Container of cashew kernels with lots of boxes wet due to condensation within the container. Corrective action was that the outer boxes were replaced (inner product was vac packed and the cost of this task was re-charged to the supplier. This was the last issue recorded.

Product recall

The company have a documented Incidents and Complaints procedure 29.10.18. An up to date contacts list is maintained. The company encourage incidents to be reported by SAQ. Identification of 3 key people (who are the Technical Manager, Shipping Manager and Logistics Manager). Customer contact details are held in IBridge. The site has not had any withdrawals or recalls in the last 12 months however the procedure stipulates that the certification body must be notified within 3 working days following the decision to recall any product.

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The recall and withdrawal system was last tested 27.8.21. Heavy Metal contamination in Chinese Groundnuts – Supplier recorded. Full recovery, Start: 10:00, Finish 13:00, timeline available total 3 hours.

Three minor non-conformances were identified in this section of the standard:

- NC 2 3.6.4 The specification from one of the traceability exercises had not been reviewed since 12.12.13.
- NC 3 3.7.2 The traceability exercise completed before the audit did not show start and end times and therefore could not determine if it had been completed within the timescale.
- NC 4 3.7.4 The traceability test carried out on a non GFSI supplier showed records that did not match and it was unclear if the exercise had been successful.

Non Applicable Clauses

Clause/Section Ref	Justification
3.3.3	No documents held my third parties.

4. Supplier and Sub-contracted Service Management

Summary section 4

Supplier Approval

The site has worked hard to rationalise their supplier lists and have reduced the number of active product and service suppliers to 64 in total and this was discussed at the audit.

Manufacturer approvals are managed by the Technical Manager. Procedure 4.1.1 dated 25/08/19 v3, this details all the criteria listed in the clause 4.1.1. Procedure has been updated to explain the risk assessment. Risk assessment 4.1.2, scores of >6 points is low risk. Supplier matrix last updated 5.1.22 shows 55 live suppliers with one only being non GFSI.

Risk assessment includes Country of Origin, complaints, VACCP, historical, recall capability and GFSI status as part of the criteria, e.g., all product sourced in the UK/EU are low risk, USA and China are medium risk and the rest of the world high risk.

- Meal / ground almond is considered high risk and as such must be DNA tested if not from a GFSI source. The main supplier of almond meal is considered low risk although this is considered a high risk product.
- Pecans from Mexico score 8 (can be purchased via 3 suppliers), have been documented as low risk.
- All suppliers are considered low risk once the whole risk assessment has been completed.

It can be identified on the access system whether there are customer specific requirements or not. The company hopes to move to a new IT system for supplier approval and specification management in the coming year. Of the current active suppliers 1 does not hold GFSI certification.

The site supply supplier approval guidance to the supplier and indicate that a GFSI supplier must supply a minimum of a specification and their certificate. For suppliers who do not hold a GFSI Accreditation, they are required to complete a SAQ, which is reissued every 3 years in compliance with 4.1.6.

This was reviewed during the audit – SAQ 24.3.21

Contracts with suppliers are produced and signed for a certain quantity, once the quantity is used, then another contract is issued and signed. The place of manufacture is known for all products.

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Records reviewed for several suppliers as part of the trace challenges.

Exceptions to the process is where there may be a customer specific requirement, i.e., for the supplier to hold GFSI accreditation. Non GFSI suppliers are required to conduct 100% testing, a complete a fully supply chain mapping of the product.

Procedure in place for the review of suppliers, Procedure 4.1.6. Reviews of suppliers is undertaken by the Senior Management team on quarterly basis. The review of suppliers, supplier performance is measured via complaints (NC's) and customer feedback.

Cashew nuts are predominantly from Vietnam and supplied vac packed in cardboard boxes. Almonds are predominantly from USA and vac packed in cardboard boxes. Peanuts are predominantly from China and South America. Open nuts are supplied in 150Kg sacks.

Service Approval

Service approval is part of the supplier approval procedure. The service supplier matrix shows 18 suppliers used in the last year.

Services provided include:

Distribution

Freezing (of Organic nuts – in the event of insect infestation)

Warehouse and Fumigation (fumigation of non-organic nuts – in the event of insect infestation)

RA 4.2.2 – covers, risk to the safety and quality of products, compliance with legal requirements (e.g., weight or label controls), customer-specific requirements, potential risks to the security of the product VACCP and TACCP). All warehouses are classed as medium risk and must either be GFSI, or audit see P&B.

Suppliers and storage and distribution facilities are required to have 3rd party accreditation (i.e. BRC, IFS, FSSC22000, BRC S&D). Once the contract is signed the Technical Manager (AS) checks to see if the supplier is approved and carries out the Risk Assessment Scoring System. The process of initial and ongoing supplier approval and risk assessment is through a “live” system IBridge.

Services provided include Storage and distribution, cleaning i.e., Fumigation (for non-conforming product where there is a foreign body or pest infestation) conducted on one service supplier who also provides a warehousing function expiry 25.1.23. Freezing also BRC expiry date: 8.1.23. This is for organic product which cannot be fumigated.

There are 13 warehouses in total across Europe, the majority of product is stored in one warehouse in the UK with the remainder stored in the other 7 warehouses - UK (8), Netherlands (4) and Germany (1). Six of the warehouses also provide a transport service.

There are 10 approved service providers who provide transport (some also provide warehousing). All are UK based. Transport is arranged to customers within Europe, some customers choose to collect the product themselves.

Supplier of transport services reviewed:

- BRC expiry 30.1.23
- BRC expiry 30.1.23

Suppliers are reviewed in conjunction with the annual management review. Documented that there had been no significant issues.

Product Security/Food Defence

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Product security is ensured through Security Systems are detailed under Procedure 4.3.1, dated 3/10/18 V.1. Supply chain mapping which is sent to all non GFSI processors. Storage facilities have CCTV and secure access.

Procedure 4.3.2 31.10.18 v1 – food defence ensured by the transport questionnaires and Terms of condition. All of the warehouses are GFSI now.

Hauliers will pick up PFN products only and transport the container to a storage facility. Product security is ensured through sealed containers, 3rd party storage and seals. Non container stock is not sealed in this way, but controls are still in place. Security risk assessment via TACCP prerequisite part of the HACCP plan details include location at warehouse and on vehicles and malicious contamination and damage. Security is mainly covered under the BRC S&D certification.

Product Inspection and Laboratory Testing

Compliance to specification is assured by Certification of Analysis and through testing and inspection. Compliance to specification is assured by requesting external reports of testing and inspection. Risk based product sampling, 13 (2 cancelled) have been completed in the last 12 months. Procedure 4.4.1 dated 30/10/18 V.1, lab testing requirements:

- Aflatoxins
- Ochratoxins (dried vine fruit)
- Micro (Salmonella – dried almonds)
- DNA (powdered product i.e. Blanched Almond Meal (powdered almonds)) – only required if using a non GFSI supplier.

Laboratories hold UKAS accreditation. UKAS2252 15.1.20 Suppliers and processors are required to carry out lab testing on each batch of product prior to despatch to UK and are required to send C of A of testing – Almonds, Cashews – Aflatoxins to MLRs (mandatory) to meet EU regulations <10, and occasional Salmonella. Dried Fruits – sulphite testing.

Test results reviewed in conjunction with the traceability exercise: Organoleptic, chemical and micro testing was conducted, all results were within acceptable limits. There was a COA provided by the supplier.

Products are sampled based on risk. Results are monitored by the Technical Manager. Certificates of conformance or analysis are verified by the logistics team. No claims are made.

Product Legality and Labelling

Legal compliance is ensured through basic labelling, no retail product is sold, and the procedure covers both country of manufacture and country of sale. Verification of legality is conducted by the warehouse and copies are attached to the goods in documents where applicable. Labelling of bulk products: Product Name, Net Weight, and Lot No. / Batch Code, DOP, Use By, Country of Origin. Documented procedure, ref: 4.5.1, dated 24.1.22 and revision 2. No changes to the product labelling is completed once the product has left the manufacturer.

Product Design and Development

No private customer label products. No branding applied. NPD is not conducted by the site on behalf of clients.

Product Release

Product release is managed by Logistics, Directors, and the Technical Manager. Positive release is not required. Products are deemed released unless a customer requires a specific info on a batch, if not the supplier or providers will comply with FIFO rules. Without a C of A, the site cannot release from customs.

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Product Authenticity

Product authenticity is controlled, the site has access to the following information sources – supplier guides, customer guides, the FSA, RASFF and the Nut Association. Collecting the info is managed by the Technical Manager.

A documented VACCP study been completed on each product type from each country e.g., birdfeed supplied from four different countries. Two are rated as Medium which are Ground Almond meal from 2 sources US and EU. DNA testing is stated to be required on non - GFSI suppliers. 13.1.22: Californian Shelled Blanched Almonds DNA testing (9 nut screen – almond detected). The risk assessment review was last conducted on 17.10.21. All other products have been classified as low risk.

Management of Surplus Products

There are no surplus products sold or donated to charities. There is no customer branded products. Customers are manufacturers.

No minor non-conformances were identified in this section of the standard.

Non Applicable Clauses

Clause/Section Ref	Justification
4.4.3	No Product claims are made
4.5.2	Customer does not stipulate any specific labelling requirements
4.6	No NPD conducted
4.9	No surplus product is donated to charities or other organisations

5. Personnel
Summary section 5

Training is generally conducted internally with external training where required. Senior Management Team have a wealth of industry knowledge and experience. Very small management team, with constant communication demonstrated. All the site personnel have worked together for several years. The Technical manager has a background in ambient sterilised pouches and snacks including dried nuts. Training procedure in place 5.1.1, dated 03/09/18 V.1. Training matrix in place, training for the 8 company employees carried out according to job role. Job descriptions are signed. This includes Food hygiene Sept 14 for TM and 5 day M&S course and HACCP. Induction training includes Quality policy. Other procedures include Warehouse, transport, service SAQ, traceability and Control of non-conforming product (for 3 key members) and also supplier approval, and complaint handling.

Records of training reviewed for JT–HACCP L3 21.10.19, Job Description, Procedures for Quality policy, Supplier approval, Transport Terms and warehouse, SAQ Service, NC product and Traceability Procedure trained on 17.12.21. Food Hygiene certificate L2 7.10.21

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Competency of training is assured through internal audit. Review of competencies to be annual.

No non-conformances raised in this section of the standard

Non Applicable Clauses	
Clause/Section Ref	Justification
	All clauses covered.

6. FSMA Preparedness Module
Not Applicable

Non Applicable Clauses	
Clause/Section Ref	Justification



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