

Audit Report

Global Standard Agents and Brokers Issue 3:October 2021

1. Audit Summary					
Company name	Premier Fruit and Nut Ltd	BRCGS Site Code	1219216		
Operation	Broker				
Services	Storage Distribution Importation Export Repacking Further processing Select a service	Product categories	2 - Ambient food Please select Please select Please select		
Scope of audit	Broker for dried fruits, nuts (raw and roasted), snacks, seeds and bird foods including 3rd party services of import and export to manufacturers and packers, storage, distribution, repacking and further processing as required.				
Exclusion from scope	None				
Audit Start Date	2023-01-30	Audit Finish Date	2023-01-31		
Re-audit due date	2024-02-06	Audit frequency	12		
2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit Programme	Blended Announced
Certificate issue date	2023-02-14	Certificate expiry date	2024-03-19		
Previous audit grade	AA	Previous audit date	2022-02-02		

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
Choose an item	Choose an item		

Number of Non-Conformities	Critical	0
	Major	0
	Minor	0

SAI Global Pty Ltd 680 George street Sydney NSW Australia 2000		
Page 1 ID 10725	Report No. WI-1492707	Auditor: Andrew Dewhurst



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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	50	No. of product categories traded	1
Other certificates held	Soil Association – Licence Number P4662 – Exp 31.08.23				
Product safety incidents (e.g product recalls) in the last 12 months	No				
Regions actively exporting to	Europe Choose an item. Choose an item. Choose an item.	Regions actively importing from	Asia North America South America Europe Africa		
Major changes since last BRCGS audit	None				
<p>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. This audit has been completed as blended announced using MS Teams and email.</p>					

Company Locations		
Site Name	Country	Audit Type (in person/remote)
Premier Fruit & Nut Ltd	United Kingdom	Remote

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5. Audit Duration Details

Total audit duration	10 man hours
Reasons for deviation from typical or expected audit duration	None

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2023-01-30	09:00	17:00
2	2023-01-31	09:00	11:00

Key Personnel

Auditor_number	Name	Role
20755	Andrew Dewhurst	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	Title	Opening Meeting	Procedure Review	Closing Meeting
Rajeev Shah	Director	X		X
Ajay Shakya	Technical Manager	X	X	X
James Taylor	Shipping Manager	X		X
Sergiy Shpektorov	Logistics Manager	X		X

Document control

CB Report number	WI-1492707
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<i>Template Name</i>	AB306 Agents & Brokers Audit Report Template v1		
<i>Standard Issue</i>	3	<i>Template issue date</i>	04/03/2022
<i>Directory allocation</i>	Agents & Brokers	<i>Version</i>	1.1

Non-Conformity Summary Sheet

Critical			
No.	Clause	Detail	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

Comments on non-conformities
There were no non-conformances identified during the audit.

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Additional Module Non-Conformity Summary Sheet – Meeting FSMA requirements (Module 6)

Critical			
No	Clause	Detail	Re-audit due 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



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Detailed Audit Report

1. Senior Management Commitment

There is a documented Food Safety and Quality Policy dated 04.11.22, Version 3 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 – reviewed 07.01.23 which have been defined as:
>95% Suppliers approved through GFSI accreditation.

Average customer complaint response time < 10 days, Complaint per million sold <5

Lab Testing – 100% compliance with Aflatoxin and Salmonella testing results

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

The company food safety culture plan Last review: 23.01.23, has been developed based on feedback from 2 staff surveys in Jun 2022 and more recently in Jan 23. The Jan 23 survey showed an improvement in results with all categories showing at least 90% scoring. Actions arising from the survey include Relevant member of staff will be involved in next KPI meeting and setting quality objectives so that they are aware what is expected from them – with a timescale for completion of April 2023.

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.

Management review meetings are held quarterly and attended by 5 of the senior management team. The last meeting was held on 06.01.23. 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 24.10.86. The site is registered with Croydon Council, Company Ref 2067461, since 2014. The council have visited 21.8.18 to

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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.

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.

The site has resolved the root causes of the 4 minor non-conformances raise at the previous inspection.

The audit has been conducted within the sites re-certification window - audit due 06.02.23.

A Company Director attended both the opening and closing meetings.

The company have an organisational chart ref 1.2.1 issued 07.02.19 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.

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.

The BRCGS logo is used on the company website and on email footers – the correct version of the log is used.

Non Applicable Clauses

Clause/Section Ref	Justification
	None in this section.

2. Hazard and Risk Assessment

The site has a HACCP plan in place 10.08.22 v9 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 16.02.17 and 14 yrs. food industry experience. The remaining members are Trader and Director RS – 31.10.19- 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 consumption and a small volume of Indian snacks (fried lentils and peas). The product descriptions have been grouped into five broad areas of Nuts (80% of business, includes 2% organic nuts), Bird Feed (10% of business), Dried fruit (8% of business), Seeds (<1% of business), and Snacks (1% of business).

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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 10.08.22 and V9. 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,
- 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

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transport)

All 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.
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: 10.08.22, no items raised, no changes noted.

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

The company have an established Quality Manual. The Quality Manual is held electronically in the format of the A&B v3 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 ERP 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
- Supplier
- Rotation
- PIV (Purchase Invoice Number)
- Supplier Invoice
- Date, Invoice, Customer, Goods Out, Balance, Remarks.

The company has document control procedure, 3.2.1 , issued 10.10.22 version 2 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 showing the correct versions of documents that are in use as seen during the audit. 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

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retained for 5 years.

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.

The site have an Internal Audit system based on the BRC A&B V3 standard. 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 2022. A schedule for 2022/2023 has been developed with audits spread across the year. This is an excel based document. There are at least 4 dates, spread across the year, where internal audits are completed per year.

Internal audits reviewed:

Section 3.6 - Specification for products – completed 14/10/2022

Section 4.1 - Approval and performance monitoring of manufacturers/packers of traded products - completed 15/12/2022

Section 2 - Hazard and risk assessment – completed 12/01/2023

The auditors have been trained and consist of the Technical Manager (AS) trained 30.09.16 BRC 3rd party auditor. Audits are also carried out by SS who has been trained 21.02.19 - All Safe Internal Auditing. The other auditor is the Director (RS) trained 06.11.18. Very few non-conformances were noted being raised.

There is a controlled list of active specifications.

The company have a specification system and generally the site adopts the supplier specification but will also generate their own version for customers. The specs are authorised by the Technical Manager and loaded onto shared drive. The site 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 utilising the IBridge system.



Specifications reviewed include:
Cashews LP – 25.01.22

Raw Pistachio Kernels – 10.11.21

Blanched Peanuts – 14.06.21

Californian Shelled Nonpareil Extra No.1 – 06.05.21.

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.

A traceability audit was carried out during the audit on:

Product Selected: Vietnamese Cashewnut Kernels LP.

Contract Reference P2100365 / 1/01/01-00 – Purchase Invoice PIV221052. Lot NAM S-002360 – Packed 15.11.22. Received 29.11.22. Sales logged on the stock card from 19.01.23 through to 26.01.23.

700 cases (x 50lb) received into stock on 29.11.22. Current closing stock is 162 cases (x50lb).

Supplied by DL – BRCGS Exp 16.09.23. Supplier Specification – 11.11.22. A stock card is completed for each transactions and includes where the products was bought from, where it was sold to and mass balance.

Documents reviewed as aprt of the traceability challenge include:

Purchase Invoice, Stock Card, iBridge Traceability Report, Bill of Exchange, Commercial Invoice, Packing List, Certificate of origin, Non GMO certificate, Shipping Document, Quality and weight certificate, Health Certificate, BHC certificate, Gas Free Certificate, Fumigation certificate, Sample label, Phytosanitary certificate, Physical inspection certificate (Roast Test Certificate), Aflatoxin, Heavy metals, Microbiological certificate, Certificate of origin, Weight Certificate.

A Mass Balance was completed and included-

Received 700ctn X 50lb each bag = 35000lbs

Sold: 538ctn X 50lb = 26900lbs

Stock on hand = 162ctn X 50lb = 8100lbs

The site carry out traceability exercises at least annually- most recently on Pakistani Dates, Pitted Chopped, 8-10mm – on 24.01.23. Batch / Lot D22-01/01A, Container No APZU3303545.

The company have a customer complaints procedure linked to the product recall / incidents 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.

Non-conforming product and Corrective Action Procedure – Issued 30.10.18, Version 1 covers Corrective and Preventative Actions and Control of Non-conforming Product as well asdefining the requirement for a root cause analysis to be carried out as relevant. 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.



Limited incidents of non-conforming product / complaints logged – currently 23 incidents since the last audit.

The complaints are logged, investigated and trended to identify root cause. Currently Foreign Bodies (Materials) is the key complaint trend which is accounting for almost 70% of the complaints, however there is no common trend to the type of foreign body material being found.

The company have a documented Incidents and Complaints procedure 25.10.22, Version 3. 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 or in the event of any local authority action or serious incident. The recall and withdrawal system was last tested 24.01.23. Heavy Metal contamination in Brazilian Groundnut Kernels – Supplier recorded. Full recovery, Start: 13:00, Finish 14:30, timeline available total 1.5 hours.

Non Applicable Clauses

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

4. Supplier and Sub-contracted Service Management

The site have a supplier approval procedure – 4.1.1 – Version 3, issued 25.08.19, this details all the criteria listed in the clause 4.1.1.

Manufacturer approvals are managed by the Technical Manager. Risk assessment 4.1.2, scores of >6 points is low risk. Supplier matrix last updated 20.01.23 shows 57 live suppliers all of which are approved via third party GFSI certification. 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 of potential adulteration and as such is routinely DNA tested. The main supplier of almond meal is considered low risk although this is considered a high risk product.

All suppliers are considered low risk once the mitigating supply chain controls have been taken into account and the whole risk assessment has been completed.

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.

The site are aware of the current suspension of the IFS standard from the GFSI Benchmark.

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. 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 certification. Currently all suppliers are GFSI certified and therefore there are no specific customer requirements.

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 is part of the supplier approval procedure. The service supplier matrix shows 20 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)

The Service Suppliers Risk Assessment 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 are certified to a GFSI standard.

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 12.01.24. Freezing also BRC expiry date: 10.03.23. This is for organic product which cannot be fumigated.

There are 11 warehouses in total the majority of product is stored in one warehouse in the UK with the remainder stored in the other 10 warehouses. The warehouses also provide a transport service.

There are 11 approved service providers who provide transport in conjunction with warehousing. Transport is arranged to customers within Europe, some customers choose to collect the product themselves.

Supplier of transport services reviewed:

ARC - BRCGS expiry 20.12.23

AK – IFS Logistics expiry 20.01.24

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

Product security is ensured through Security Systems as detailed under Procedure 4.3.2, dated 31.10.22 Version 2. Storage facilities have CCTV and secure access. Food defence is ensured by the transport questionnaires and Terms of condition which all warehouse and transport companies are required to sign as part of trading agreement. 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

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plan details include location at warehouse and on vehicles and malicious contamination and damage. Security is mainly covered under the BRCGS S&D certification.

Compliance to specification is assured by Certification of Analysis and through testing and inspection. Risk based product sampling, 13 (2 cancelled) have been completed in the last 12 months. Procedure 4.4.1 details lab testing requirements:

- Aflatoxins
- Ochratoxins (dried vine fruit)
- Micro (Salmonella – dried almonds)
- DNA (powdered product i.e. Blanched Almond Meal (powdered almonds)).

Laboratories hold UKAS accreditation. SGS - UKAS1549 09.03.21 and i2 FAST Ltd – UKAS 10852 26.10.21. 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. Some products are organically certified – Site are certified through the Soil Association – Licence Number P4662 – Exp 31.08.23.

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 24.01.22 and revision 2. No changes to the product labelling is completed once the product has left the manufacturer.

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. 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.

Ground Almond Meal DNA testing (9 nut screen – almond detected – 13.12.22).

Almonds Ground Blanched - <1 mg/kg (ppm) Peanut DNA detected.

The risk assessment review was last conducted on 31.10.22. All other products have been classified as low risk.

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



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

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.

Training procedure in place 5.1.1, dated 03.09.18 Version 1. Training matrix in place, training for the 8 company employees carried out according to job role. Job descriptions are signed.. 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.

There have been no new team members within the last year.

Records reviewed for AS – Technical Manager – BRCGS Professional – 22.01.19, BRCGS Third Party Auditor 30.09.16, Level 3 HACCP 16.02.17.

Non Applicable Clauses	
Clause/Section Ref	Justification

6. Meeting FSMA Requirements

Not Applicable

Non Applicable Clauses	
Clause/Section Ref	Justification
	Not Applicable.

