Audit Report

Global Standard for Food Safety Issue 7: July 2015

1.Audit Summary			
Company name	Alara Wholefoods Ltd	BRC Site Code	1298291
Site name	Alara Wholefoods Ltd		
Scope of audit	The milling, blending and packing of breakfast cereals, including muesli, nuts, dried fruit and seeds, in heat sealed bags, sachets, pots and stitched paper or multi-ply sacks. The mixing and roasting of granola, as a raw material for inclusion in breakfast cereals.		
Exclusions from scope	Exclusion from scope		
Justification for exclusion	Justification for exclusion		
Audit Finish Date	2016-07-19		
Re-audit due date	2017-07-22		

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

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Announced
Previous audit grade	A	Previous audit date	2015-06-29		

Number of non-conformities		
	Fundamental	0
	Critical	0
	Major	0
	Minor	5

3.Company Details			
Address	108-112, Camley Street, London N1C 4PF		
Country	UK	Site Telephone Number	0207 387 9303
Commercial representative Name	Teresa Bartasevicitute	Email	teresa@alara.co.uk
Technical representative Name	Omowunmi Olunloyo	Email	toks@alara.co.uk

4.Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	Organic, Fairtrade.				
Regions exported to	Europe Asia Africa Oceania				
Company registration number	None				
Major changes since last BRC audit	New Technical Manager (November 2015). Development of site based marketing team.				

Company Description
A privately owned company established in 1975. Moved to current site in 1985 (Unit 1) and growth led to an additional unit (Unit 2) in 2004. The units are around 35 years old and have been adapted to meet food handling and storage requirements. The business has an organic product range amounting to around 50% of output and has been organically certified since 1986. Most products are retail packed and sold under Alara or customer own label branding. Weekly output is about 100 tonnes and there is a single production shift.

5.Product Characteristics

Product categories	15 - Dried food and ingredients 17 - Cereals and snacks				
Finished product safety rationale	Ambient stable dry foods (aW <0.6). Long shelf life.				
High care	No	High risk	No	Ambient high care	No
Justification for area	Decision tree process used to determine low risk status.				
Allergens handled on site	Cereals containing gluten Milk Nuts Peanuts Soya Sesame Sulphur dioxide and Sulphites				
Product claims made e.g. IP, organic	Organic, Fairtrade, Gluten Free, Scottish Oats, Vegetarian, Vegan				
Product recalls in last 12 Months	No				
Products in production at the time of the audit	Granola base mix, gluten free oats, porridge pots, Caramel Apple Paleonol				

6.Audit Duration Details			
On-site duration	12 man hours	Duration of production facility inspection	6 man hours
Reasons for deviation from typical or expected audit duration	Total time on site included an organic inspection.		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1	2016-07-18	09:00	17:30
2	2016-07-19	09:00	17:45

	Auditor (s) number(s)	Names and roles of others
Auditor Number	135015	C Wells
Second Auditor Number	N/A	

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.9) Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Alex Smith, Founding Director	X			X
Katrina Smith. Managing Director	X			
David Effa, Production Manager	X	X(Part)		X
Tom Furga, Warehouse Manager	X	X(Part)		X
Omowunmi Olunloyo, Technical Manager	X	X	X	X

Regina Diko, QA Technician	X		X(Part)	

Non-Conformity Summary Sheet

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

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

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

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	2.5.1	Manual pack flow diagram includes metal detection at process step 19, which is not applicable to foil membrane sealed pots	Manual pack flow diagram updated to remove step 19 metal detection which is no longer applicable to the product.	New Technical manager now in place will ensure ongoing review of HACCP	Amended flow diagram dated 27/07/16 issue 5	2016-08-25	Carol Garle

2	4.6.1	Hobart mixer stand in Unit 1 Granola area improvised from old pallets and conti board. Placement and construction does not readily enable inspection and cleaning.	Mixer stand replaced with materials of more suitable construction.	New Technical Manager will ensure site team use appropriate materials in future constructions.	Photo of new stainless steel Hobart stand.	2016-08-25	Carol Garle
3	4.9.2.1	Metal control procedure omits reference to needles – used to stitch paper sacks.	Control of knives and broken blades procedure updated to include needles used to stitch paper sacks.	Technical Manager to ensure that all metal related material is included in the metal control procedure.	Amended procedure dated 27/07/16 issue 5	2016-08-25	Carol Garle
4	4.10.3.2	Key to restart bagging metal detector (Unit 1) left in situ. This may facilitate unauthorised usage.	Keys removed during audit. Line leader and QA briefed to retain the keys when leaving the machine.	Staff briefing and ongoing monitoring by technical team.	Staff briefing record dated 29/07/16 with signatures of team.	2016-08-25	Carol Garle
5	4.11.1	Old mouse droppings discovered in an area not readily accessible for inspection and cleaning.	Area cleaned immediately. With new stand this is now readily accessible for inspection and cleaning.	All future equipment to be located in areas that are readily accessible for inspection and cleaning.	Photo of cleaned area with new stand showing access.	2016-08-25	Carol Garle

Comments on non-conformities

None

Voluntary Modules Non-Conformity Summary Sheet

Critical (AVM)			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major (AVM)							
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 (AVM)							
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**

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

There is a documented Food Safety and Quality policy signed by Alex Smith and dated 2/5/16 which is displayed in reception area and staff rest room. It is also included in the induction information given to all new employees.
The company demonstrated their commitment to the Standard based on the level of on-site managerial resource, staff training and financial investment sufficient to produce safe, legal and quality food.

Clear objectives/targets are established by the company which are specific, measurable and achievable and these include: Completion of hygiene audits (min 80% score), passing of customer / third party audits with no failures or major non conformities, retention of Grade A status for BRC v7, customer complaints 30 CPMU, appropriately trained staff. These are reported as key performance indicators and reviewed at the Management Review meetings held quarterly. Quality targets appear to on track (Hygiene audits for June, Unit 1 95%, Unit 2 96%, Complaints 21 cpmu, refresher training undertaken June 2016).

Last review meeting, the annual review was 6/6/16 - previous was 8/3/16. Management Review meeting agendas include all elements of 1.1.3., and follow a standard agenda, with minutes issued covering issues raised, actions required, assignment of responsibility and timescales for completion. Other meetings held include a monthly management meeting (minutes taken) and a weekly production meeting. Resource issues can be raised at either meeting.

The site is kept informed of the points listed in 1.1.6 by subscription to trade bodies (Campden BRI, Food and Drink Federation, Soil Association, Coeliac Society) and official websites, including FSA and Food Fraud. These are reviewed and reported by the Technical Manager.

The two non-conformities raised at last year's audit (3.9.1 and 4.3.2) have been resolved and there was evidence that root cause has been identified and actions instigated to prevent recurrence.

1.2 Organisational structure, responsibilities and management authority

There is an established and experienced team of managers based on site with the Managing Director being in overall charge. The day to day operations of the site are shared between the management team comprising: production, technical and warehouse managers. An organogram is in place (v20 27/6/16).

Deputies for key staff are defined within the Structure document (v9 20/4/16) The Quality Technician deputises for the Technical Manager, and the Support Specialist or Founding Director deputise for the Production Manager.

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

A number of work instructions, including those for Metal Detection and Goods In were reviewed during the audit and found to be operational and relevant.
Job descriptions were reviewed for the QC Technician and Production Team Leader.

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

2 The Food Safety Plan – HACCP

The company's food safety plan is based on Codex Alimentarius HACCP principles. There is one HACCP study currently at revision 7 and dated 1/4/16.
The HACCP team is led by the Technical Manager who is trained to HACCP Level 3 (Highfield 25/10/11) and has12 years' experience within the food industry.
The HACCP team includes representatives from production, technical /quality and warehouse and are trained to either HACCP level 3 or have received internal training. All team members have relevant industry experience.
The scope of the study includes the procurement and intake of raw materials and packaging, the storage, preparation, product assembly and packing, and the despatch and delivery of finished product. The HACCP covers all the products produced at the site. It is systematic, comprehensive and fully implemented and maintained.

A comprehensive pre-requisite programme is in place covering: Cleaning and housekeeping, waste control, pest control, traceability, allergen control, supplier approval, raw material handling, personal hygiene, training, calibration, storage, maintenance, transportation, glass and hard plastic control etc. Pre-requisites used to manage specific hazards e.g. cleaning regimes for preventing allergen cross contamination have been validated by accredited laboratory testing and are routinely verified by rapid test swabbing and visual inspection, with records kept. General pre-requisites, such as pest control, validation is based on industry best practice.

Product descriptions are defined as multiple ingredient muesli products, including those with granola bases, produced on site, gluten free and free from products, breakfast snack pots and single ingredient products.

References to legislation have been made within the study including: EC 852 and 853 / 2004, Food Safety Act 1990 Food Information Regulation No 1185 / 2014, Materials and Articles in Contact with Food (England) 2009, EC 1924/2006 Nutrition and Health Claims. Coeliac UK Gluten Free Product Declaration Customer Codes of Practice.

Intended use is documented as all consumers including vulnerable groups like children and elderly people and specialist groups including allergy sufferers, the health and welfare conscious. Potential for known customer misuse include incorrect storage and children may choke on small pieces.
There is one generic flow diagram (v10 dated 22/5/14) and nine line specific flow process diagrams:

Milling v2 4/7/16, Roasting v2 27/5/16, Bagging v6 4/7/16, Boxing v6 4/7/16, Portion Pack v5 4/7/16 Ton Mix v5 4/7/16 Hand Pack v6 4/7/16 and Manual Packing v4 4/7/16 Verification by HACCP team and sign off of diagrams. Reviewed Bagging Line - dated 26/5/16. The process flow diagrams cover the process steps, which typically include: Purchase, delivery to external store, receipt on site, allocation of pallet codes, QA inspection of ingredients and inspection of packaging items, allocation to storage areas. Picking of stock to order. Machine cleaning prior to use. Ingredient addition (scaling to recipe quantity), mixing, roasting, cooling and bagging of granola as WIP. Finished product assembly - scaling to recipe requirements, mixing, gravity transfer to bagging/boxing portion packs or ton mix/bagging. Packing to form filled films or paper sacks, hand / manual filling to pouches, pots. Closure, metal detection, check-weighing, case packing palletising warehouse storage as stock or direct delivery to customer.

N/C 1 - Manual pack flow diagram includes metal detection at process step 19, which is not applicable to foil membrane sealed pots

Physical, chemical, microbiological and allergen hazards have been considered within the study. Micro-organisms of concern include Salmonella, E Coli and Staph. Aureus, Bacillus Cereus, Enteros. Yeasts and Moulds. Physical hazards include glass, metal, paper, plastics stones nut shell, pit fragments, wood, stalk and cap stems. Chemical hazards include mycotoxins, pesticide residues and cleaning chemicals. Allergen hazards (including supply chain risks, handled on site and via visitors/workers raw materials) are included within the HACCP study.

Hazard analysis has been based on a likelihood x severity basis, using a 5 x 5 matrix, with scores above 6 being considered as a significant hazard and the use of Codex decision tree to determine Critical Control Point status. The following CCPs have been identified and critical limits defined:
CCP1- QA inspection of ingredients (step 5)
Critical Limit: as per raw material specification requirement, monitored by QA for every delivery of fruit, nuts, seeds and some cereals, recorded on Alara database.
CCP2 Machine cleaning (step 9)
Critical Limit: machine is visually clean and negative gluten swab result. Monitored by QA, recorded on: Machine Cleaning Checklist, and Gluten Swab Test Results.
CCP3 – Metal Detection (step 19)
Critical limit: Bagged product Fe 2.0mm, non Fe 2.0mm, stainless steel 2.5mm. Other products Fe 3.0mm, non Fe 3.0mm and stainless steel 3.5mm. Monitoring and start and end of each run, hourly intervals and after a breakdown. Record as Metal Detector Checks record.

A corrective action procedure is in place. Responsibilities for monitoring the critical limits and for corrective action are defined.

Validation of the critical limits has been based on industry standards (CCP3), product chemical and microbiological results (CCP1 and 2) and shelf life testing.

Verification is carried out during daily routine line checks and internal auditing. Periodic verification reviews are carried out system documentation, records, internal audits, deviations and corrective actions, complaints and incidents.

The HACCP plan is reviewed at least annually (last reviewed on 26/5/16), where relevant changes occur or following a recall.

Details of non-applicable clauses with justification

Clause reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

The 2016 Quality Manual has been written to meet the requirements of the Standard and contains policies, procedures, work instructions and record forms. It is controlled electronically by the Technical Manager. There is one hard reference copy and pdf access to PC users on site.

All documents and signage are produced in English, the common language. Photo standards and diagrams are additionally used as an aid to clarity. Specific work instructions are available at key locations and in departmental folders.

3.2 Documentation control

Document Control Procedure: v9, dated 4/4/16. Controlled documents are listed on a Document Control Log, with title, reference number, and version number. The reason for change is identified as a footnote to the current document. Control is managed by the Technical team, with notification of new documents / versions by email to relevant parties and physical rescinding of obsolete documents. There is a separate list of approved individuals and samples of signatures.

3.3 Record completion and maintenance

Records are mostly completed manually and are stored as hard copy. Electronic records are backed up daily, by IT Support. Records reviewed in situ during the audit were seen to be legible and genuine and those reviewed for the trace and vertical audit were readily retrieved.

Records are retained for 36 months (longest shelf life of product is 12 months from manufacturing date, if sealed and stored in cool, dry conditions).

3.4 Internal audit

Internal audits are carried out throughout the year with the frequency determined by risk assessment. The audit schedule is based on the calendar year and each section of the Global Standard is audited annually. Sections 3 and 4 are subdivided over March / June and September / October respectively.

There are six trained internal auditors based on site (OO, RD, JH, DE, PA and TB) who are responsible for the site internal audits. The Technical Manager has internal auditor training from a previous job (KFF January 2011, and Campden BRI Internal Auditor, Practice and Principles April 2007). Other members of the audit team have received internal auditor training and a recent refresher (6/7/16). The auditors on site cross audit departments to ensure independence from direct responsibility.

Internal audit records reviewed included HACCP 28/4/16 (RD) and Personnel 24/6/16 (PA) and were comprehensive recording evidence of both conformity and non-conformity.
Corrective actions and their timescales are agreed and completion are verified the auditor.

Weekly hygiene/fabrication and GMP inspections are carried out, by QA staff and based on risk assessment. Reports (as "Internal systems Integrity Audit") reviewed included w/c 8/7/16 and 8/1/16. The formats reference hazards, inspection results, compliant/ non-compliant status, corrective action and timescales and a completion sign off.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

A risk assessment of raw material categories has been carried out, with products assessed for allergen, foreign body, chemical, microbiological and substitution/fraud risks. The assessment is undertaken by the Technical Manager, is subject to annual review and was last undertaken 4/7/16.

Suppliers of raw materials and packaging are approved and monitored by the Technical Manager using the Supplier Approval and Performance Monitoring procedure v7 4/1/16 (for ingredients) and Supplier Approval v4 15/7/16 for packaging. Assessment of suppliers is based on risk, quality and historical compliance.

An approved supplier list v4 15/7/16 is in place. There are separate lists for approved raw materials (alphabetic 1-203, v3 22/4/16) and for finished products (1-366, v2 22/4/16). Suppliers are requested to complete a self-audit questionnaire and / or provide certification information. New suppliers are assessed on five categories (QMS, premises hygiene and maintenance, allergen control, processing methods and consumer risk). There are two pass grades (with reassessment after 12 months (Grade A) or six months (Grade B). Those failing to meet criteria are not approved. The reassessment includes extra categories including complaints, a material specification review, certification / SAQ/Audit, certificates of Analysis / Conformity. At this stage there are five grades (pass = grades A-D, Fail = grade F and a delisting.).
Those graded A at the outset and A-B on reassessment are deemed low risk. SAQ / approval reviewed for Supplier FWT. Initial assessment score 55 - grade A, reassessment score 70 – grade B so 2 yearly review (next SAQ 2018).

Supplier questionnaires are issued annually or bi-annually and suppliers are required to notify the site of any significant changes in the meantime. Suppliers' traceability procedures are assessed by the Technical Manager, based on certification status or trace audit data requested.

Around 20% of suppliers used are agents some of whom are now BRC Agent and Broker certified, with the balance supplying packer details of ingredients supplied. Sampled as follows:
BRC certificate (A&B) for supplier FWT: site code 3518492 Issued by Cert ID and valid to 29/6/17 scoped for dried fruits, nuts seeds and pulses. Certificate of Inspection supplied for brazil nuts sourced via supplier OT. Certificate no 18359 identifies the producer in Bolivia.

Ongoing monitoring of supplier performance is via complaint's, non-conforming product procedures etc. Exceptions are covered under the Supplier Approval procedure and require prior approval of the Founding Director or Technical Manager, approval of a raw material specification and receipt of a certificate of analysis. Exceptions are notified to relevant customers, as appropriate.

3.5.2 Raw material and packaging acceptance and monitoring procedures

Goods In Procedure: v7 2/5/16, covers intake checking requirements, including vehicle hygiene, pallet condition, and product / documentation review – undertaken by forklift drivers. An "Expected Deliveries Sheet is issued weekly to identify by day and item, the goods expected. The document also includes a verification record for organic / Fairtrade status and other provenance, plus a flag if a QC check is required. The "Raw Material Control" (v10 5/4/16) identifies materials for which a Certificate of Analysis is required for every batch. Materials include: nuts and peanuts, vine fruits, tropical fruits, gluten free products, sunflower seeds, Goji berries, strawberries and coconut.

Items are assigned colour coded pallet labels with product description and date of receipt and assigned to specified storage areas, according to status. Where a QA check is required the goods are placed on "Hold" and then sampled by QA in a separate area of the Unit 1 warehouse. Specific inspection criteria are preloaded to the Alara database by ingredient description. The QA inspection checklist covers organoleptic, foreign bodies, infestation and for packaging, artwork checks.

3.5.3 Management of suppliers of services

Service suppliers are approved and monitored by the Technical Manager using the Contractors Approval procedure (v8 2/5/16) and have appropriate contracts. These were reviewed for suppliers of pest control, external storage and laundry.

3.5.4 Management of outsourced processing and packing

No processing is outsourced

3.6 Specifications

Copies of suppliers' specifications are held for all raw materials and packaging. Master specifications are held on the Alara Technical Drive and include amendment details as necessary.

Manufacturing instructions/specifications are available at workstations and confirm compliance with finished goods specifications.

Finished product specifications are generated by the company and are supplied to customers on customer or site format according to requirement.

Specifications are agreed with customers where possible or as part of the product development process. Ordering of product in absence of a formal sign off is deemed as acceptance. The following specifications were reviewed and found to be compliant:
Raw Material
Puffed Quinoa (v1 21/4/16)
Organic Brazil nuts (v5 13/6/16)

Packaging - Supplier: CCL 4002 62 BOPET Laminate

Finished product - Alara ITG Organic Active Muesli (v5 15/1/16)
Specifications are reviewed minimum 3 yearly or where changes occur.

3.7 Corrective and preventive actions

Corrective action procedure (v7 4/1/16) is in place. Non-conformities that result in a risk to product safety, legality or quality are investigated and recorded in line with clause requirements. This includes the

assessment of the consequences of the non-conformity by the auditor and verification of corrective action by the auditor or Technical Manager. Root cause analysis and the implementation of further corrective action to address the root cause, where this is necessary.

3.8 Control of non-conforming product

Control of Non-conforming Produce Procedure (v7 4/1/16) Non-conforming products are identified by QC "Hold" notices and QC "Reject" tape. The Technical department is informed and are responsible for the holding and release of products. All incidents of non-conforming product are recorded on Hold notices. Noted for organic sultanas in Unit 1 warehouse (received 18/7/16)– awaiting QA check.

Records are in place to demonstrate the investigation, analysis and cause of any non-conforming product. Defined responsibility and actions/timescales are documented.

3.9 Traceability

A recording system is in place with all raw materials, in process materials, packaging and finished product coded to allow for full traceability through the system. The traceability system is manual and paper based. It operates on a date based system with finished product assigned a best before date and raw materials being assigned a receipt date, and with the receipt date for ingredients transferred to a mix/ packing record which includes the finished product best before date.

Traceability systems of suppliers approved via questionnaire only are verified by trace audit data supplied. Rework Procedure (v3 1/4/16), specifies rework types and requires like for like product use only.
The company carry out an annual traceability challenge including mass balance and this was undertaken forwards on 27/6/16 on organic chopped dates (batch P-DF-DAT-OR-05), and backwards on 13/6/16 on Very Berry Muesli.

A traceability challenge and mass balance was undertaken during the audit on Alara ITG Organic Active Muesli, BB18/7/17). The exercise was completed in 4 hours.

3.10 Complaint handling

A system of complaint handling is implemented via the Complaint Handling Procedure v6 4/1/16 All complaints are logged and investigated by the Technical Department with full details kept of all actions taken.

Complaint target is set at 2 CPMU for stones and 30 CPMU for other issues, with the current level (June 2016) 2 CPMU for stones and 21 CPMU for other issues. Complaints are trended weekly and reported monthly, with results also graphed and displayed in the rest room.

3.11 Management of incidents, product withdrawal and product recall

The company have a Product Recall and Withdrawal Procedure (v12 1/4/16) and an aligned Crisis Management Procedure (v7 1/4/16). The former identifies critical, major and minor criteria, with examples of incident types leading to recall or withdrawal. The latter identifies the crisis management team, with contact details for key staff, service providers (including BRC Certification body) and customers. There is an 11 step process to be followed for actual incidents and for the annual mock recall test. This was undertaken on N**** Y**** Organic Jumbo Oats on 6/6/616. Post recall review contains a timed record of activity, by process step.

3.12 Customer focus and communication

Specific customer requirements are determined through codes of practice, product development and increasingly through electronic databased specification systems. One particular requirement is for ground spice additions to mixes to be sieved.

The site ensures these are kept up to date and communicated via management meetings and staff briefings. Product specific recipes / working methods etc. are amended to meet requirements. Specifications would be amended and agreed with suppliers, as needed to meet particular customer requirements.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.4 (1-4)	No outsourced processing.

4. Site standards

4.1 External standards

The site is located on a small trading estate on Camley Street, in an area to the north of Kings Cross Station that has seen much renewal and development over recent years. The premises comprise two units across a secure yard that is shared with one other business, a stationary wholesaler. The combined Alara premises occupy around 1400 sq. metres and include warehousing, processing and packing facilities. The main premises were constructed about 40 years ago and have been updated and adapted to current use and appear externally sound and well proofed against potential pest ingression. A cabin has been installed in the yard to provide additional office capacity for the new sales and marketing team. The grounds are maintained in good order and the yard / roadways suitably surfaced. The only other adjoining business, on the opposite side of the short service road is a cash and carry.

4.2 Security

The site has a documented Security Policy (v4 1/4/16). The premises are located within a fenced yard which is secured out of operating hours. CCTV provision externally and internally. Access to Unit 1 is via a reception area, clocking in point for staff and screening for visitors and contractors. No direct unaccompanied access for third party visitors to Unit 1. Unit 2, across the yard has key pad entry. There are no external storage tanks, silos, intake pipes etc.

Training is in place to remind staff to identify and report any unauthorised personnel. An annual security assessment is carried out, last was undertaken 20/6/16. EHO: premises registered ***with Camden Council***

4.3 Layout, product flow and segregation

The site is classified as low risk and a plan dated 8/7/13 identifies specific areas, including enclosed product and non-production areas.
The plan shows delineation, segregation, access routes for personnel, staff facilities, production process

flow and waste removal. Entrance to processing areas are via changing facilities, for the donning of protective clothing and handwashing.

Drivers, visitors and contractors are required to report to reception in Unit 1, which is clearly signed. Incoming goods are received via Unit 1 which includes the QA inspection facility and main warehousing for ingredients. Storage provision is assigned in pallet racking for raw materials and some packaging. Unit 1 also includes a granola mixing, roasting and packing facility. Additionally the Unit includes a mixing and VFFS bagging line, some offices and the staff rest room. Unit 2 is located across the yard and is the main processing and packing area. Accessed via changing area etc. packing machines are located on the ground floor, with product assembly / mixing on a mezzanine floor above. Each individual line is gravity fed and self-contained. Warehouse storage provision for some work in progress, packaging and finished product awaiting despatch.

Most branded products are made to order and shipped on completion. Some stocks of Alara finished products are held at ground level in Unit 1 warehouse. There were no temporary structures noted.

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

Internal fabrication is generally well maintained. The units are steel framed and metal clad, with blockwork walling to around 2.5m. Wall finishes vary according to area and include painted, panelled and tiled. Some damage noted to a previously repaired door surround within the Unit 1 warehouse. Floors are sealed concrete and maintained in good repair.

There are no suspended ceilings or roof voids. Overheads are accessible for inspection and cleaning. Limited number of external facing windows in production area (notably granola room) are screened against insects. Internal glazing is plastic and all lights are fluorescent tubes protected by diffusers Separate pedestrian and vehicular access doors. Units 1 and 2 have high speed roller doors for movement of RM, packaging and finished products. Other doors, including fire escapes are close fitting. No evidence of excessive dust was noted.

4.5 Utilities – water, ice, air and other gases

All water used on site is potable and mains supplied from Thames Water. Very limited ingredient use (making syrup for granola) otherwise for cleaning and amenity use. Annual microbiological analysis is obtained from the supplier (to 31/12/14) and additional surveillance testing is carried out by an external laboratory. Annual testing schedule over April, June and September. Site plan with sampling points 8/7/13. Results reviewed for 29/4/16, Gents Changing Room fountain tap – ALS test cert. TSBN646522-1, results satisfactory.

Ice/steam is not used. Compressed air is used for machinery operation and cleaning and is filtered.

4.6 Equipment

Plant on site consists of ingredient industry standard mixing and packing equipment. Ingredients are added to mixers at high level, blended and dropped to in line packing facilities. The packing lines are specific to final pack formats and include VFFS bagging, VFFS bags into cartons, filling of pots, pouches etc. via easi-weigh type dispensers. Granola ingredients are blended on Hobart type mixers, spread to baking trays, racked and baked off in two rack ovens, prior to cooling and manual crumbing. Product is packed to 3 ply sacks as WIP for inclusion in finished product recipes. Most plant is constructed of food compatible stainless steel (grade 316). Other items include scoops, tubs and mixing bowls. Declaration for

plastic tubs, dated January 2015 confirms compliance with EC1935/2004.

One of the Hobart mixers in the granola room was located on an improvised stand, to facilitate ease of loading / unloading. The stand was constructed from reworked wooden pallets and conti board panelling. Whilst nominally portable to facilitate floor cleaning beneath, the design did not readily enable access for inspection and cleaning.

N/C 2, 4.6.1: Hobart mixer stand in Unit 1 Granola area improvised from old pallets and conti board. Placement and construction does not readily enable inspection and cleaning.

4.7 Maintenance

There is no on-site engineering team and heads of departments are responsible for condition monitoring of equipment under their control. Specialised equipment, such as mixers, weighers, packing machinery etc. is subcontracted to specialists for annual servicing. Weekly maintenance checks are scheduled and recorded, with requirements based on risk, historical information and manufacturers' recommendations.
A purchasing brief available for new equipment includes a section for completion by maintenance.
There is a hygiene/integrity check of all equipment prior to next usage (Start Up and Product Changeover Check Sheet, v3.1, 8/7/14), which includes critical inspection areas, cleaner IDs, QA sign off and production timings.

Contractors are supervised on site and have separate signing in procedures which include references to prevention of foreign body contamination. No temporary repairs were noted. Temporary repairs are subject to recording on maintenance request logs and are required to be made good ASAP.
Checks are completed following intrusive maintenance (Cleaning after Maintenance, v3 1/4/16) and includes a final sign off by QA Technician or Technical Manager.

There is a small engineering workshop located in the common area of Unit 2. Access is restricted and secure. The area includes a work bench and potentially light machining (drilling, grinding) can be undertaken. Cupboard for lubricants – all items are food compatible and of known allergen status. Ambersil supplied items (e.g. Ambergrease FG3 H1 – free from nut oils). Shelving and bin locations for spare parts, tools within a wall mounted wallet. Workshop presented in a tidy and well-ordered condition. Swarf mat provided.

4.8 Staff facilities

Staff changing facilities are provided in both Units 1 and 2. Lockers are provided for individuals' personal items. Pegs are provided for outdoor clothing.

No high risk / high care processing.

Handwashing facilities provided at the entrances to production areas in Units 1and 2 - with hands free operation and other facilities to meet clause requirements.

Ladies and Gents lavatories are provided in the common areas of both units and are provided with adequate hand washing / drying facilities and appropriate advisory signage.
No smoking is permitted on site. All entrance back into production is via the changing and handwashing facilities. A rest room is provided adjacent to a kitchenette in Unit 1, but no catering is provided. Facilities include: utensil sink and wash basin, water boiler, cooker, microwaves, toasters and a fridge /freezer. A daily condition check undertaken by one of the hygiene facilitators and recorded on "Temperature Checks for Canteen Fridges" (v3 9/8/11).

4.9 Chemical and physical product contamination control

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

The “Chemical and Physical Product Contamination Controls, Raw Material Handling, Preparation Processing, Packing and Storage areas (v1 4/1/16), includes an overview of controls in place. These include reference to HACCP, requirement for MSDS, metal detection, knife control, stationary items, wood policy and foreign body minimisation through goods in inspection and internal auditing.

4.9.1 Chemical control

Non-food chemicals are risk assessed and managed. Chemicals are stored in a secure storage area with restricted access, adjacent to the designated wet wash area located in Unit 2. The main chemicals used on site are: Jangro supplied heavy duty detergent and kitchen cleaner sanitiser.
Strongly scented/taint-forming materials are not used during production hours. Painting etc. would be undertaken after area clearance at weekends.

4.9.2 Metal control

There is a documented metal control policy in place. The “Control of knives and broken blade procedure” (1/4/16) with a registration system for knives / blades. The procedure omits reference to needles used for stitching paper sacks. The stitching machine does not operate with a broken needle.
Daily start up checks are performed and recorded on the Start Up and Product Changeover Check Sheet
No staples, pins etc. were noted in open product areas or packaging.

N/C 3, 4.9.2.1: Metal control procedure omits reference to needles – used to stitch paper sacks.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass and other brittle type materials are excluded where possible. A “Light Fitting Replacement” procedure (v3, 1/4/16), requires replacement out of production hours. A weekly glass and brittle plastic audit is carried out by the QA staff. An appropriate glass breakage procedure v5 2/5/16 is in place which includes isolation, cleaning and authorised clearance inspection procedures. No breakage incidents have been recorded for the last 12 months.

4.9.4 Products packed into glass or other brittle containers

No products are packed into glass or brittle type containers.

4.9.5 Wood

A Wood Handling Procedure (v3, 1/4/16) includes pallet checking by area of use and rejection / replacement if damaged

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Following the HACCP study, the following types of foreign object detection/removal equipment are used: Hand sieve for spices and metal detection. The use of the sieves is a customer specific requirement.

Integrity checking criteria for these devices are specified.

Additionally, coarse stainless grids are available for use to break up lumps of vine and dried fruits, chopped dates etc. that might otherwise clump and cause mixing problems or ingredient dispersion issues in finished products. The use of the grids is specified on recipe instructions.

4.10.2 Filters and sieves

Hand sieves are used for the sifting of spice ingredients prior to adding to a mix batch and are checked for integrity prior to each use. The mesh size is 20 micron and material retained by the sieves is inspected and recorded to identify contamination risks.

4.10.3 Metal detectors and X-ray equipment

All products are metal detected post packing, with the exception of a small range of products packed to rigid pots sealed with a metallised foil membrane. In this instance the ingredient is metal detected immediately prior to packing. The method of rejection is:
Belt stop/alarm: used for 25 kg sacks and case packed product on the following lines - Ton line, hand pack 1 & 2 and milling. Test piece sizes are: Fe. 3.0mm, non Fe 3.0mm and SS 3.5mm
Mechanical rejection to a locked box, on box, bagging and portion pack lines. Test piece sizes are: Fe. 2.0mm, non Fe 2.0mm and SS 2.5mm.

Metal Detection Procedure (v11, 7/7/16) ensures the effective removal and isolation of products identified as potentially containing metal. Products are inspected to identify the source of the metal. The line is restarted by designated staff (Team Leader or QA Technician) using a key The effective removal of contaminated product has been validated. Noted that a line restart key was left in situ on an unattended bagging line. Detectors are tested at start up, hourly intervals, after breakdowns and at the end of a run calibrated test pieces (as noted). Tests performed include memory tests, failsafe systems and rejection. Check demonstrated effectively at inspection by: NB, Team Leader.

N/C 5, 4.10.3.2: Key to restart bagging metal detector (Unit 1) left in situ. This may facilitate unauthorised usage.

4.10.4 Magnets

Not used

4.10.5 Optical sorting equipment

Not used

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

Some products as single ingredient items are hand packed to rigid containers. The pots are supplied inverted and are inspected prior to filling.

4.11 Housekeeping and hygiene

The site has a clean-as-you go policy and the premises were presented in a tidy and well-ordered condition. Some old mouse droppings were however noted in the Granola area underneath an improvised machine stand.
A “Cleaning Procedure” (v7, 2/5/16), outlines overall requirements and responsibilities. There is a full “End of Week” clean down on a Friday afternoon (13:40 -16:00) with optional additional deep cleaning

scheduled for Saturdays. Cleaning is also carried out every day at the end of shift with full machine strip down and surface washing by two dedicated operatives, and in between different product types. Requirements are scheduled daily, weekly and monthly. Acceptable standards of cleaning are defined by visual appearance and inspection by QA. These results are validated by monthly environmental swabbing to access TVC. For gluten free products, there is a detailed line inspection and a GF rapid test swab undertaken, with a negative result required.

Cleanliness checking is recorded in up to four formats, depending on the product to be run:

a) Confirmation on production records
b) CCP2 machine Cleaning with QA approval and sign off
c) Gluten Swab results and visual check
d) Start up and product changeover check sheet.

Colour coded and dedicated cleaning utensils based on usage e.g. yellow: for production and warehouse, blue for common areas, white for the maintenance room, black for the cleaners shed, outside and yard. Orange for allergens only, green for glass breakage – single use only.

N/C 5: 4.11.1: Old mouse droppings discovered in an area not readily accessible for inspection and cleaning.

4.11.7 Cleaning in place (CIP)

No CIP requirement.

4.12 Waste / waste disposal

All waste is cleared regularly from the processing areas and stored in suitable and identified containers. Waste containers are colour coded as an aid to separation (red = food waste, yellow = paper and black for plastic. Each unit has a compactor. The company have a commendable zero to landfill policy.

Waste is collected from site by licensed contractors:
First Mile: CBDU80647 to 28/1/19, for general waste.
FR Crawley: CB/WE5935WC to 14/12/16 for food waste.
Edwards Waste Paper: CBDU108760 to 17/5/19, for recyclable materials

Unsafe products/trademarked waste would be disposed of by stripping product from original packaging and disposing the component elements via the contractor listed above

4.13 Management of surplus food and products for animal feed

There are no surplus customer branded products as they are all made to order. There are no customer products passed on to charities or other organisations, however some surplus raw material may be donated to charity. No waste food intended for animal feed.

4.14 Pest Control

Pest Control Policy (v9, 1/4/16). Pest control risk assessment v1, 3/5/16 covering pest sightings, evidence of pest activity and bait takes. In all three instances the services of a pest contractor are sought. Where evidence of activity is noted, the area is investigated, and affected product is quarantined and disposed of.

The area is cleaned and monitored.

Site pest control is contracted to Check Services. (BPCA M15 / 102 to 31/12/16), covering 12 routine inspections and 4 field biologist inspections per annum, for rodents, cockroaches, crawling insects, SPIs and birds.

Contractors records on file and include: technician training certification, site plans (incl. 22/10/15) for each unit, ground and first floors, with details of the type and location of controls. Bait stations are tamperproof and secured. Non-toxic monitors in production areas. H&S data sheets on file for bait substances (e.g. Solo Blox - brodifacoum, 18/2/16). EFKs in appropriate locations. Demi diamond moth lures monitored by Alara staff. Contractor summary for 2016 YTD: indicates 27 visits, 5 routine, 18 follow-ups, 2 call outs and 2 technical inspections. The last visit (routine) was 13/7/16 with no issues raised. Technical inspections undertaken 31/5/16 and 24/2/16. Recommendations are assigned to service provider or client for action and completed in a timely manner. Quarterly trend analysis is undertaken and summarised by category (issues, defects, priority and tasks) and activity type (int. and ext. rodents, crawling insect, SPIs and birds). Staff are made aware of the signs of pest activity, through awareness training, and information on Indian Meal Moth was displayed in the rest room.

4.15 Storage facilities

Storage Facility Procedure, v8 4/1/16. Most raw materials, packaging, WIP and stocks of Alara finished product are stored in pallet racking.

Unit 1 warehouse majors on raw materials, some packaging and finished product stocks. Unit 2 warehouse includes some raw materials, WIP, packaging and labelling stocks. Assigned areas for items of specific status. There is a separate label printing room in Unit 2, with dedicated staff. Part used packaging is inspected for suitability/cleanliness and covered and returned to store at the end of run. Obsolete packaging is regarded as “non-conforming product” and suitable labelled, whilst remaining in stock, awaiting disposal.

All items are stored at ambient – no temperature control required. No controlled atmosphere storage.
A curtain sided trailer, based in the yard, is used as an additional storage facility for packaging and some raw material items. These are checked prior to movement into factory areas. Seen to be in good order, tidy condition and with curtains secured.

Stock rotation is facilitated by colour coded labels annotated with the product description and date of receipt. Colour coding as follows: Blue = Gluten free. Red = Organic, Green = non organic and yellow = Fairtrade. An organic and gluten free raw material would have a bi coloured label.

4.16 Dispatch and transport

Alara branded finished products are stored on site and shipped to order. Own label products are produced to order and shipped on completion. Despatch via third party haulage, although some customers collect.
All vehicles are inspected prior to loading and this check is recorded on the “Order Collating Sheet”.
All finished products are despatched at ambient temperature.
Handling equipment comprises fork lift trucks for pallet movements of raw materials, packaging and finished products. Routine condition checks in place, with a maintenance service agreement with Allianz Engineering.

Documented “Transport and Despatch Procedure” (v2 2/5/16). Finished products are all palletised and stretch-wrapped. Vehicles are required to be clean and odour free. Mixed loads permitted only if

comprising packed foodstuffs.

Traceability maintained through transit as all products are packed and date coded, with the product specific date code annotated to the “Order Collating Sheet” (pick list).

Two third party hauliers used: Tingley and Palletway. Neither are currently BRC S&D accredited, approval is based on the “Contract Transport Questionnaire” (v2 17/212), and contracts covering requirements of this section. Reviewed for Tingley Transport (2/2/10).

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5	No high risk
4.3.6	No high care
4.3.7	No ambient high care
4.4.3	Drainage not required for excessive water use.
4.4.4	No high risk
4.4.6	No suspended ceilings
4.4.7	No windows for ventilation purposes
4.4.13	No high risk
4.5.3	All water used is mains potable.
4.8.4	No high risk
4.8.5	No high care
4.8.10	No catering provided.
4.9.4 (1-3)	No products packed into glass or other brittle containers.

4.10.4.1	No magnets used
4.10.5.1	No optical sorting equipment used.
4.10.6.2	Container cleaning equipment not used.
4.11.7 (1-3)	No CIP requirement.
4.14.3	Contracted pest control
4.15.3	Temperature controlled storage is not required.
4.15.4	Controlled atmosphere storage is not required.
4.16.3	Temperature controlled transport is not required.

5. Product control

5.1 Product design/development

Documented “New Product Development” Procedure (v3, 1/4/16) identifies criteria for the processing and packing of cereal based products. NPD is led by the Technical Manager (and HACCP team leader). Proposals are referred for HACCP evaluation and development of a process flow diagram. Most new products are similar in composition and process / packing requirements, but trials are undertaken to validate formulation and processing where necessary. Shelf life testing: based on retained 5 pack sample undertaken on a sensory basis, for months 3, 6, 9 and 12. 5th sample sent for lab testing at end of life.

5.2 Product labelling

Label Approval and Storage Procedure (v3, 1/4/16). Label and packaging approval against legal requirements by Technical Manager. Label / packaging – delivery, storage and printing, approved and signed off by the QA Technician. Label acceptance also signed off by the QA Technician.
Where changes to labelling occur, there is a two stage check and sign off: this includes the customer for branded products, before committing for printing.

One product is labelled as vegan, the recipe containing no animal derived ingredients.
Label approval process for customer branded products, requires the client to submit artwork drafts to Alara for approval and on acceptance printing is initiated.

5.3 Management of allergens

The following allergens are handled on site: cereals containing gluten, peanuts, soya, milk, nuts and sesame. Sulphur dioxide is present as a preservative in some dried fruits, but not handled in its own right.

An allergen policy (v5 1/4/16), procedure (v4, 1/4/16) and allergen matrix is in place. All raw materials, products and the process have been risk assessed: “Allergens in Products” (15/7/16) considers all finished products and ingredients in a matrix against the 14 allergens. Process step risk assessment (v3, 25/4/16) rates severity / likelihood pre and post control.

Separate areas are dedicated for allergen storage / use, with colour coded equipment and additional protective clothing. All allergens are identified by pallet labelling and stored in assigned and labelled areas of the Unit 1 warehouse. Visitor questionnaires include questions relating to allergens.

Production is scheduled to enable gluten free products to be produced first (on a Monday and Tuesday) after a full “end of week” (Friday) clean down. Other products are produced after plant and equipment has been cleaned and inspected. Cleaning utensils for allergens are colour coded orange, or are disposable after use. For products other than gluten-free, the risk of cross contamination cannot be avoided despite the scheduling and cleaning practices in place. Warnings are included on product labels; “produced on a site which handles….” which are product/allergen specific. Risk assessment and justification v1, 29/4/16. Rework is only used on a like for like basis.

A gluten free claim is made for some products. This is validated by sending product samples for laboratory testing to accredited methods. There is a monthly schedule for non-client products and samples of all one clients’ gluten free products are sent for weekly testing, when produced. Gluten free results reviewed for 21/6/16 A**** Organic Active Muesli. Gluten to ELISA <5 and for 22/3/16 M******* Fruit Granola Gluten to ELISA <5.

5.4 Product authenticity, claims and chain of custody

The site obtains information on threats to the supply chain which could lead to adulteration/substitution of raw materials by subscription to web based sources such as FSA and UK Serious Fraud Office, trade organisations – Food and Drink Federation and reference publications; PAS 96:2014.

A documented vulnerability assessment has been carried out (v1, 4/7/16) and risks assessed by raw materials and contact packaging. No high risk items identified. Certificates of analysis are already required for nuts and peanuts, vine fruits, tropical fruits, gluten free products, sunflower seeds, goji berries, strawberries and coconut.

The following claims are made for certain products: organic, Fairtrade and Scottish oats.
The site has organic certification (SA Certification, P1301 to 30/6/17) and Fairtrade certification (FLO 3285 to 9/9/17). There is a policy and work instructions and a process flow is in place.
Handling procedures for Organic, Fairtrade and Scottish Oats are in place (organic v9, 1/4/16, Fairtrade v2, 1/4/16 and Scottish Oats v7, 2/5/16).

All products are produced to order, against a batch specific recipe, with ingredients picked from stock against a recipe based checklist. The pick list includes a full product description and requires confirmation of receipt date (from pallet label) and lot number / best before date from the original packaging Line clearance confirmed through “Start up and Product changeover Check Sheet” and other checks (including label / packaging approval) on the production schedule.
A traceability test and mass balance is carried out at six monthly intervals and the last recorded test was for organic chopped dates undertaken on 27/6/16.

5.5 Product packaging

Products are packed into a variety of media including PE or PP pre-printed VFFS bags, with or without

additional labelling, plain VFFS bags into pre-printed cartons, labelled pouches, labelled PET pots, pre-printed coated paper pots and 3 ply Kraft paper sacks for bulk items.

Food contact information and suitability for the intended product has been provided by suppliers of all food contact packaging. Traceability for all contact packaging used is recorded and maintained. Reviewed in conjunction with trace audit: plain film (420WPET12+CPP40, lot 77475), granola, ex paper sack lot 19802

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

There is a scheduled programme of testing, covering products and the processing environment. Microbiological product analysis is sub contracted ALS which is carried out as surveillance only with a schedule covering all product ranges annually or more frequently if customer required.
The following laboratory tests are also carried out: pesticide multi residue (org oats, vine fruits) aflatoxin (nuts), ochratoxin (vine fruit), SO2 (fruit), peroxide value and free fatty acid (nuts).

Hand swabs are undertaken monthly (23/5/16 ALS Cert TCHT1160923-1 (P). Machine swabbing also undertaken monthly on a rolling basis: Portion packer hopper (23/5/16). ALS cert TCHT1160926-1)

Reviews of all test results and trend analysis is carried out by the Technical Manager and any out of specification results are risk assessed and the customer consulted, if appropriate.
Visual and organoleptic tests only, are carried out on site. for raw materials and finished products
EOL testing is carried out to verify shelf life. 5th sample for micro testing (TVC Staphs, yeasts, moulds, Salmonella). Reviewed Berry Burst Granola 29/6/16, ALS cert. TCHT1175659.

5.6.2 Laboratory testing

The external laboratories used are accredited as follows: ALS: UKAS 1282, FAC: UKAS 4400.
There is no on-site laboratory. Trained staff for raw material and finished product assessments.

5.7 Product release

Products are released by QA based on a satisfactory “Finished Goods Check”, which is undertaken in the first 10 minutes of the packing run. This process includes a sensory test, check of seal integrity, labelling and packaging checks. Manufacturing specifications are in place at key locations detailing product specifications. No positive release requirement.

Details of non-applicable clauses with justification

Clause reference	Justification
5.6.2.2	No site laboratory
5.7.1	No positive release requirement

6. Process control

6.1 Control of operations

Documented general work instructions are in place. These include Goods In (v7) – CCP 1 QA sampling and inspection, Storage (v8) Mixing (v5), Roasting - time and temperature (v4), Granola – time and temperature (v4), Milling (v2) Mixing Machine (v3) and Metal detection (v11). Recipes are issued the production schedule and include product specific requirements. Critical control points are highlighted in situ, with signage.

Process monitoring checks are carried out and recorded for every batch: pre start machine cleanliness checking (CCP 2), ingredient inclusion by item, quantity and traceability code, packaging and labelling, metal detection sensitivity checks (CCP 3), at start, end and hourly through the batch run, weight checks and finished product checks.

There is no in-line monitoring. All processing operations are manually overseen.
“Control of Non-conforming Product” procedure (v7, 4/1/16) is in place in the case of equipment failure or deviation of the process from specification.

6.2 Labelling and pack control

Labelling and Pack Control procedure (v3, 4/1/16). Designated label room in Unit 2, with assigned supervisor (JH) prints to production schedule requirements.
Packaging / labelling is allocated to lines to meet scheduled requirements. Films are allocated from the warehouse to Unit 2 packing area via in-line hatches. There is a “Daily Label Print List” and a Packaging Traceability Record which enable a reconciliation of items issued packed.

A full line clearance is undertaken at product changeover and appropriate checks are recorded (Production Schedule, Pre Pack QC Weight Check, Pre Pack Finished Goods Check and for granola WIP, Roasting Record).

Retained labels / packaging are attached to the Prepack QC Weight Check Sheet and Pre Pack Finished Goods Check Sheets. Average packing runs are about 30 minutes apiece. For longer runs label / packaging samples are collected every 2 hours. Coding arrangements are date only, so times are annotated to retained samples as taken.

6.3 Quantity, weight, volume and number control

Requirements documented as Finished Product Weight Checks (v4, 2/5/16).
Retail products are packed to average weight, monitored either by in-line check-weighers or manual weight checking of 5 samples, three times per hour.
The quantity contained in bulk packs is to minimum weight with weight checking at start, end and hourly intervals. Underweights are usually split open and fed back into the start of the process.

6.4 Calibration and control of measuring and monitoring devices

The company maintains a Calibration List (v8, 17/6/16) which identifies the item, location, calibration method, result, responsibility and frequency.
Measuring devices are externally checked at the following frequency: cast iron weights – annually, metal detectors – six monthly, and check weighers and scales every four months.

Certification on file and sampled as follows:
Cast iron weights: London Borough of Havering (UKAS 0294) 14/6/16 for AW1-4.
Ingredient scale (Serial ADMC2128) 6/6/16, previous 9/2/16
Metal detector (CCP 3). Stealth Fortress (serial 156427) Sparc Systems 11/5/16.
The “Calibration of Equipment” procedure (v8, 2/5/16), details the corrective action procedure.

Details of non-applicable clauses with justification

Clause reference	Justification
6.1.3	No inline monitoring devices.
6.1.4	No equipment critical to safety or quality.
6.2.4	No on line vision equipment
6.3.2	All products are sold by weight,

7. Personnel

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

The company has a comprehensive training programme for staff on induction and production roles.
Induction training covers an introduction to the company, general policies and procedures, health and safety, personal hygiene, PPE, allergen awareness and handling procedures, etc.
All staff are directly employed, agency staff are not used.

Documented Training Procedure (v8 1/6/16), with on the job training provided under the supervision of team leaders. Matrix to identify job based requirements against individuals. Competence testing by questionnaire for key areas (e.g. allergens, gluten free and organic) Training records are maintained by topic and date with details of the trainer and attendees and duration.

Specific training procedures and records are available and were challenged for the following CCP monitoring points: Metal Detection – CCP3, undertaken by team leaders (GR, MT, LH, NB and MA), Goods In Sampling and Inspection – CCP1 undertaken by QA (PS, RD) and Machine Cleaning Verification - CCP2, undertaken by QA (PS, AK, RD).

Other staff training records reviewed included: hygiene facilitators (VL and VK) for chemicals – 24/3/16
Staff interviewed during the audit were competent in their roles e.g. (PS from QA, and NB, Team Leader)

A programme of refresher training is in place. For general purposes this is undertaken annually (e.g. 7/6/16 covering food safety, HACCP, personal hygiene, factory cleaning, allergens and customer complaints) or where procedures are updated.

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

Personal hygiene standards, which meet clause requirements, are documented and covered during induction training. The company have a Personal Hygiene Procedure (v5 1/6/16), the essence of which is covered within a “Staff Code of Conduct” declaration which is completed and signed off by each member of staff. Personal hygiene requirements meet clause requirements and good observance was noted throughout the site.

The correct method of hand washing is clearly displayed at all hand wash basins and requirements are specified in the Staff code of Conduct (e.g. after visiting the lavatory, on entry to production areas, after any unhygienic activity and touching the floor)

Blue metal detectable plasters are issued by first aiders for cuts and grazes. Plasters are batch tested through a metal detector. Last plaster batch (21/6/11) test was 14/9/11.There are relatively few instances of cuts and abrasions’.

The use and storage of personal medicines is controlled by a Personal Medicines Policy (v8 1/4/16), which restricts storage to personal lockers and usage to non-food areas.

7.3 Medical screening

Employees are made aware of the symptoms of infection, disease or conditions which would prevent them from working with open food at induction training.

Medical Screening Procedure (v6 4/1/16) is in place to enable staff, including temporary staff, to notify the site of any relevant symptoms, infection, disease or condition which they may have been in contact with or be suffering from. Illness at work has to be reported to the Technical Manager, and persons either assigned non-food handling duties, or sent home.

A visitor Health Questionnaire (v9 23/6/16) is in place with a verification check by the company host. Return-to-work interviews are carried out following absence/illness and this is detailed in the company handbook/rules issued to all staff members.

7.4 Protective clothing: employees or visitors to production areas

Documented procedures are in place for the wearing of protective clothing (Protective Clothing Procedure v6, 4/1/16). Company issued and externally laundered protective clothing is provided with a minimum weekly change. Standard items include mop cap, ¾ length white coat and safety shoes for production and packing area use. High visibility vest for warehouse and yard use.

The laundry is approved on the basis of a self-audit questionnaire. The external laundry operates procedures which meet clause requirements. A weekly check of overalls is made to confirm damage and stain free status of garments.

Blue cut resistant gloves are available for use in packing areas. Oven gloves and high visibility vests are not suitable for laundering and are replaced when they become soiled.

Details of non-applicable clauses with justification	
Clause reference	**Justification**
7.4.4	No high risk, or high care

Module 8 - Traded Goods

Scope	

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

8.2 Specifications

8.3 Product inspection and laboratory testing

8.4 Product legality
8.5 Traceability

Module 9: Management of Food Materials for Animal Feed

Scope	
9.1 Management Commitment	
9.2 HACCP	
9.3 Outsourced Production	

9.4 Specifications
9.5 Traceability
9.6 Chemical and Physical Product Contamination Control
9.7 Labelling
9.8 Training

Module 11: Meat supply chain assurance

Scope	

11.1 Traceability

11.2 Approval of meat supply chain

11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training