

	Issues	Critical / Major / Minor	Correction	Preventive action (to prevent recurrence of non-conformity by addressing its root cause)	When	Who	Action approved by auditor (name and date)
1	<p><b>4.14 Pest Control</b></p> <p>The site has had ongoing rodent issues in the warehouses of Units 1 &amp; 2 since August 2015 with the last instance reported on 6/4/16 when two mice were caught in the Unit 2 warehouse (follow ups are ongoing for this issue). The following issues were raised with regards to the management of the pest control issues:</p> <p>a) Whilst follow up visits have been completed for each instance of activity, with traps put in place where applicable, the site has failed to address the root cause of the issues in a timely manner. Repeat corrective action requests had still not been addressed for the following issues raised by Pest Control:</p> <ul style="list-style-type: none"> <li>• Chest freezer on mezzanine is attached to floor providing no access for cleaning underneath – debris observed during inspection.</li> <li>• Access issues in warehouse for inspection of baits / checking for signs of activity - access still poor in the corner of Unit 2 warehouse (near bait 14) with clutter being stored on the ledge and no access for inspection under motor unit located at ground level below the ledge.</li> </ul>	Major					

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1 co nt.	<p><b>4.14 Pest Control continued</b></p> <ul style="list-style-type: none"> <li>Removal and cleaning inside the bagger motor cover (flour beetle historically reported in August 2015). Cleaning was reportedly done at the time of the issue but a schedule has not been put in place for periodic removal and cleaning inside panels. Product debris was noted when a panel was removed during the audit.</li> </ul> <p>b) Droppings were observed by the auditor on the high level ledge in the warehouse in two locations near to bait nr 14.</p> <p>c) In the instances of pest activity being found in the warehouse, the site has not historically completed any documented risk assessment / investigation to confirm that any affected product has been identified and quarantined- as required in clause 4.14.16.</p>	Major cont.					

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2	<p><b>5.3.0.1 Allergen Management</b></p> <p>The site has not fully met the requirements of Our Standard – Technical Policy for Retailer Free From Products with regards to the gluten / wheat free products.</p> <p>The following issues were identified:</p> <p>a) The allergen risk assessment presented during the audit was dated 16/4/12 and covered all allergens handled on site as opposed to focussing on gluten free production as required in Our Standard i.e.: 'Where Free From products are produced in non-dedicated sites, additional risk assessments shall be undertaken to assure the Free From status of the product'.</p> <p>b) There was no evidence of review of the allergen risk assessment since 2012.</p> <p>c) The documented allergen risk assessment did not consider the hazards associated with the use of air hoses for dry cleaning - to ensure all risks of cross contamination from dust were effectively managed.</p>	Major					

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2 CO nt	<p><b>5.3.0.1 Allergen Management continued</b></p> <p>d) There was no documented evidence that the gluten free swab had been completed after the last gluten clean in the roasting room for granola roasted on 18/12/15 and used on 15/2/16 in Retailer GF Granola BB 15/11/16.</p> <p>e) There is no specific cleaning record completed for the post gluten deep cleans carried out in the Granola roasting area – to confirm that chemicals have been used / validated cleaning procedures have been followed.</p> <p>f) The following issues are raised with regards to packing records for the gluten free production:</p> <ul style="list-style-type: none"> <li>• The site does not currently include the time of production on packs as required in section 6.9 of Our Standard.</li> <li>• Various production records for the traceability product showed different running times making it unclear what the start and end times of the GF product run were.</li> </ul> <p><b>A full review of the requirements of OUR STANDARD should be completed.</b></p>	Major cont.					

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3	<p><b>3.5.1.3 Supplier Approval – Agents &amp; Brokers</b></p> <p>a) The site could not provide supplier approval information for the manufacturing sites of the following raw materials which are supplied via agents:</p> <ul style="list-style-type: none"> <li>• Turkish Sultanas supplied by Free World Trading,</li> <li>• Cinnamon supplied by Cotswold Health.</li> </ul> <p>b) The approved raw material specification for the Sultanas from, Free World Trading did not clearly state the manufacturing company Isik Tarmin (although it was confirmed through the Certificate of Analysis).</p>	Minor					

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4	<p><b>3.5.3.1.Management of Supplier of Services</b></p> <p>Issues raised regarding the management of the external company used to store raw materials and transport finished product (Tingleys Transport) were as follows:</p> <ul style="list-style-type: none"> <li>• Lack of evidence of an up to date supplier audit: The company are not BRC accredited and Alara had not audited the company since 2012. Approval records suggested an audit was due in 2014 but had not been completed.</li> <li>• Evidence of pest control management at Tingleys storage depot was not provided during the audit, despite it being requested in good time.</li> </ul>	Minor					
5	<p><b>3.12.3 Customer Focus - Retailer Supplier Academy Training</b></p> <p>a) The Management team were not aware of the Retailer specific Technical Policies (e.g. Raw Material Sourcing Policy, Foreign Body Policy, Labelling &amp; Coding Policy).</p> <p>b) Key site personnel had not attended the relevant Retailer Supplier Academy Courses.</p>	Minor					

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6	<p><b>4.2 Security</b></p> <p>Retailer finished product is loaded on to a curtain sider located in the yard straight from the packing line. The gate from the access road into the yard is left open all day and there are no additional security measures in place to stop access to the yard. As a result, when all staff were on their morning break the yard area was unattended and the trailer was left open - resulting in potential access to Retailer product for malicious tampering.</p> <p>See comments</p>	Minor					
7	<p><b>4.6.2 Equipment Condition</b></p> <p>a) The black seal around the flaps on the drop chute from the mixer to the hopper was partially missing on Line 8 (portion pack line) and had been stuck in with a yellow glue-like material on line 3. Potential to contaminate product, and also make the visual inspection of cleaning of this area difficult (This is a CCP due to gluten free production).</p> <p>b) A set of small scales in the granola roasting room were damaged making them hard to clean as well as a potential foreign body hazard.</p>	Minor					
	Issues	Critical / Major / Minor	Correction	Preventive action (to prevent recurrence of non-conformity by addressing its root cause)	When	Who	Action approved by auditor (name and date)

8	<p><b>4.7.7 Maintenance – Workshop</b></p> <p>a) Two wooden handled tools were observed in the workshop, which could reportedly be used in the factory.</p> <p>b) Food grade and non-food grade lubricants were not clearly segregated in the workshop, as required in Our Standard.</p>	Minor					
9	<p><b>4.9 Physical Contamination Controls</b></p> <p>The following issues observed in the factory could result in potential foreign body contamination of product:</p> <p>a) The site routinely uses very thin clear plastic as protective dust covers over the film on the back of the baggers / over clean equipment stored on plant.</p> <p>b) Tape engineering was observed on the ceiling/around electrical cables on the hopper floor on line 8, and around an air hose in use on line 3.</p> <p>c) Staples were observed on paperwork in the coding office in the factory (against site procedure). NB Stapler was located and immediately removed.</p> <p>d) Sections of the door seal on the old oven in the granola roasting area were ripped along the edge.</p>	Minor					
	<b>Issues</b>	<b>Critical / Major / Minor</b>	<b>Correction</b>	<b>Preventive action (to prevent recurrence of non-conformity by addressing its root cause)</b>	<b>When</b>	<b>Who</b>	<b>Action approved by auditor (name and date)</b>



10	<p><b>4.10.0.1 Metal Detection</b></p> <p>a) The site is not completing the daily test with a large 20mm test piece.</p> <p>b) The procedure does not state that metal sticks should be placed at leading, middle and trailing edge.</p> <p>c) It was noted that a white plastic guard on the metal detector belt was occasionally changing the orientation of the packs as presented to the metal detector head. (Orientation of packs should remain consistent).</p> <p>c) There is no audible/visual indication of the metal detector system status e.g. when product is rejected.</p> <p>d) The site is not routinely testing the 'reject confirmation system fault' failsafe on the metal detectors (when tested on the request of the auditor it did work correctly).</p>	Minor					
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	Issues	Critical / Major / Minor	Correction	Preventive action (to prevent recurrence of non-conformity by addressing its root cause)	When	Who	Action approved by auditor (name and date)
10 cont.	<p><b>4.10.0.1 Metal Detection continued</b></p> <p>e) There was no system in place to test whether the metal detector was fitted with an automated belt-stop failure system for loss in air pressure. (Staff were not sure if this failsafe was in place).</p> <p>f) Staff stated that product which had been rejected could be released if it did not reject on further investigations. This is not in line with Retailer policy, which states if product is rejected it must remain rejected (Section 5.4).</p> <p><b>Documentary evidence requested for this non-conformance.</b></p>	Minor cont.					
11	<p><b>5.1.5 Product Control</b></p> <p>On the traceability product the granola component mix was two months old at point of use. The site could not confirm that the shelf life testing of the product took into account the worst-case shelf life of the granola component as required in Our Standard - Guidelines for Generation of Microbiological Shelf Life Data.</p>	Minor					

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12	<p><b>5.4.2 Raw Material Vulnerability Assessment</b></p> <p>The site has not yet completed the documented vulnerability assessment of its raw materials, to assess potential risks of adulteration or substitution e.g. for higher risk items such as ground cinnamon.</p>	Minor					
13	<p><b>6.2.5 Control of Labelling &amp; Coding</b></p> <p>Whilst no labelling or coding issues were identified, the following requirements of our standard were not met:</p> <p>a) The site does not have a system for the recording the issue and return of packaging that allows for full reconciliation of planned usage against the production schedule versus actual usage (Section 2.3).</p> <p>b) Printed film is issued to line and returned from lines via a shared hatch, which covers all the packing lines and is not controlled. Packaging is not segregated at this point, and various reels of different types of printed film were observed in the hatch, which could potentially cause confusion/ errors on line (Section 2.3).</p>	Minor					

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13 CO nt	<p><b>6.2.5 Control of Labelling &amp; Coding continued</b></p> <p>c) Documented checks on the coding and printed packaging used are only taken at the start of the run by production, with an additional QC check completed during the run. There are no additional checks in place for new film reels / after breaks / at end of run. (Section 2.6)</p> <p>d) A retained sample of coded packaging is only taken once per run by QC, not at every check as detailed above. (Section 2.6)</p> <p>e) The production and QC sheets used to record coding and packaging checks are not all routinely countersigned (Section 2.6).</p> <p><b>Documentary evidence requested for this non-conformance.</b></p>	Minor cont.					

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14	<p><b>6.3 Weight Control</b></p> <p>Although there is a check weigher on the line the site is relying on manual weight checks to meet legal requirements at present. It was noted that the T1 tolerance for a 400g pack (like Retailer Granola) was not documented on the manual weight check sheet and staff were unclear what the T1 value was when questioned. (Other pack sizes were listed correctly.)</p>	Minor					
15	<p><b>7.4 Protective Clothing</b></p> <p>a) A forklift truck driver in the warehouse was wearing his beard snood around his neck rather than over his beard.</p> <p>b) The site currently allows both eating and the wearing of factory coats in the production office.</p>	Minor					

**AUDITOR COMMENTS**

<b>Non-conformity reference</b>	
General	Grading of the audit as an amber with 2 majors and documentary evidence for clauses 4.10.0.1 and 6.2.5 was agreed with Retailer TM via email on 13/4/16.
4.14	a) A number of pallets of material were checked at ground level by auditor and no further debris/signs of activity found. It was noted that over recent weeks the site has taken extensive steps to close out remaining proofing issues which were believed to be allowing rodents access into the warehouse from wall cavities. The bagger with the flour beetle issue is not used for Retailer production.
5.3.0.1	Product testing results showed a level of <5ppm on the batch of this finished product (start, middle and end sample).
4.2	The site has recently invested in security access controls at pedestrian doors into the two units but has not yet put any controls in place for access to the yard.

**AUDIT REPORT REVIEW (to be completed by person reviewing the report before its formal issue)**

<b>Audit reviewed by</b>	
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	

**AUDIT CLOSURE AND CERTIFICATION DECISION (to be completed by Retailer Supplier Standards auditor or Approved Technical Reviewer)**

Audit closed & certificated by: (Scope, exclusions and grade as page 2 confirmed)	
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	

**Auditor comments where supplier corrections and / or corrective actions are deemed inadequate:**

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