

Audit Report

Global Standard for Storage and Distribution Issue 4: May 2021

1. Audit Summary			
Company name	Greenearth Food Packaging Ltd	Site Code	1045950
Site name	Melksham		
Scope of audit	Storage and wholesale (branded only) of primary and secondary food packaging.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Start Date	2025-10-24	Audit Finish Date	2025-10-24
Re-audit due date	2026-10-27	Audit result	CERTIFICATED
Certificate issue date	2025-12-02	Certificate expiry date	2026-12-08
2. Audit Results			
Audit grade	AA	Audit Programme	Announced
Previous audit grade	AA+	Previous audit date	2024-08-23
Number of non-conformities	Critical		0
	Major		0
	Minor		2

Additional modules included		
Modules	Scope	Exclusions from Scope
10 Wholesale Module	Wholesale (branded only) of primary and secondary food packaging	N/A
10.2 Branded Products	Wholesale (branded only) of primary and secondary food packaging	N/A

3. Product Characteristics

Product categories	Activities
03 - Packaging and packing materials	01 - Storage 04 - Wholesale Module

4. Company Details

Address	Units A3 and A4, Ashville Centre, Commerce Way, Hampton Park West, Melksham, Wiltshire SN12 6ZE		
Country	UK	Site Telephone Number	+44 (0)1225 707744
Commercial representative Name	Julian Ellison	Email	Julian@gefpc.co.uk
Technical representative Name	Andy Nutland	Email	andy@gefpc.co.uk

Additional Locations

Site Name	Address	Activities

5. Company Profile

Plant/Warehouse size (sq. m)	<10K sq.m	No. of employees	1-50	No. of Vehicles	0
Subcontracted processes	Yes	Regions exported to	Europe		
Other certificates held	None				
Major changes since last BRCGS audit	None				

Company Description
 Greenearth Food Packaging Ltd is a privately-owned company established in 2008 and has operated from the current site for 15 years. The Company specializes in the storage and wholesale (branded) only, of approximately 100 different product packaging lines which include bakeable papers, cake moulds, self-supporting pie trays and cupcake / muffin / chocolate cases. The two adjoining storage facilities (units A3

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5. Company Profile

and A4) extend to some 500sqm, with a storage capacity of up to 200 pallets. 3 staff employed operating on a day shift across a five day per week delivery schedule, despatching approximately 15 pallets per week, using subcontracted despatch vehicles. The Company customer base is predominantly UK based food processors in the baking industry.

6. Audit Duration Details

Total audit duration	7 man hours	Site & vehicles audit duration	2 man hours
Reasons for deviation from typical or expected audit duration	Small site and storage area, no movement of product during audit. Small team, QMS well managed and easily accessible		
Next audit type selected	Announced		

Audit Duration per day		
Audit Date	Start Time	Finish time
2025-10-24	08.30	15.30

	Auditor Number	Name	Role
Auditor Number	22080	Andy Burne	Lead Auditor
Second Auditor Number	N/A		Please select

Key Personnel

Name	Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Julian Ellison	Managing Director	On site	On site	On site	On site
Andy Nutland	Office Manager	On site		On site	On site
Susan Clarke	Sales Administrator	On site			On site

GFSI Audit History

Date	Scheme/Standard	Announced/Unannounced
2025-10-24	BRCGS S&D Issue 4	Announced
2024-08-23	BRCGS S&D Issue 4	Unannounced
2023-10-02	BRCGS S&D Issue 4	Announced

Document control

CB Report number	AB35/25		
Template Name	SD406 Storage & Distribution Audit Report Template v3		
Standard Issue	4	Template issue date	2022-02-15
Directory allocation	S&D	Version	1.1

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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
1	2.3	The HACCP team leader was last trained in HACCP in 2009 by a consultant with no recent evidence of any formal HACCP training	2 No. courses for HACCP Level 2 training have been booked with 'High Speed Training'. See attached copy Invoice 263211. Sec 8.1.1b has been updated to include dates for refresher training, this has been communicated across the Team	Timescales for refresher training for HACCP, Internal Audits, FLT to be included on training records (Sec 8.1.1b.) Ensure relevant training is provided. To be reviewed at least annually	No timescales for refresher training included on training records see Sec 8.1.1b. No formal process for measuring frequency of training were being captured	2025-11-20	A Burne
2	3.2.2	The HACCP Team Leader carried out the internal audit on HACCP and therefore was not independent from the area.	The HACCP Team Leader will be JE. AN will carry out the internal audits on HACCP. Revisions to Sec 2.2 and Sec 2.3 HACCP have been made	The responsibilities of JE and AN will be revised on the HACCP documents - S2.2 and S2.3. The HACCP Team Leader will be JE. This will be communicated across the Team	The responsibilities of JE and AN were annotated incorrectly on the HACCP (Sec 2.2 and Sec 2.3) giving rise to the Non-Conformance.	2025-11-20	A Burne

Comments on non-conformities
N/A

Head Office Non-Conformity Summary

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

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Detailed Report

1.Senior Management Commitment

The company had a Quality Policy Statement – 02/04/24 signed by the MD, stating their intention to purchase, store and distribute, meet customer orders and requirements, comply with food safety and hygiene and purchase from approved suppliers and work to continual improvement.

The company has a clear plan in place for product safety and quality culture – S1.1.2a, Iss: 2, 14/03/22 – Reviewed 03.04.25. The plan is incorporated into the induction of staff and there is an employee handbook that includes product quality culture and the understanding of whistleblowing. This is reviewed annually.

Activities include staff questionnaires (1.1.2b), training needs, discussing product safety with staff and feedback of issues in management review meetings. This is reviewed for effectiveness every year in the verification system – this is verified in the management review. Questionnaires reviewed for all members of staff – 04/2025. All results are tallied (1.1.2c) and a plan of action is identified if scores in any area. The Quality Culture Plan seem appropriate to the size of the business with 3 people including the MD on site.

Site provided adequate human and financial resources.

Quality objectives have been set by all suppliers / retailers and are different for each customer. KPIs were reviewed for:

KPIs set August 2025 and reviewed quarterly (reviewed for the previous 3rd quarters. 2nd quarters no issues were identified, with the site meeting target and 1NCs (Re: Customer complaint regarding packaging)

- To ensure >90% products are dispatched to the customer in perfect condition - Compliant
- Deliveries Zero nonconformities for transport contractors for on time deliveries/damage Compliance
- <10% of orders are customer complaints -<5% mis-picking ->90% of all sample requests to be dealt with on the same day of request.

Last reviewed 18.08.25 and 19.05.25, and 28.02.25

Staff are aware of safety reporting. The site had a confidential reporting system ref 30.07.21, but with only 3 people in the company it was not generally used.

Site holds a current copy of the standard. Previous NCs have been effectively closed out.

The most Senior Manager attended the opening meeting and closing meetings. The recertification audit was undertaken within the audit window.

The site uses the BRCGS logo in their emails and on the Website and is compliant with the protocol.

Site has contacted Wiltshire Council Public Protection Service to register the business and EHO has confirmed the don't need to register as a food business.

There is an annual management review meeting which covers all requirements – this was also

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carried out on 04.04.25. Management meetings are also held monthly and cover all relevant items and KPIs and was attended by JE, AN, SC signed off for Sept 2025, August 2025, July 2025. Also included the review of the Food Safety Culture

An organisational chart was in place – S1.3.1a (19/08/21, reviewed 03/04/25) consists of: MD Manager, Office Manager/Warehouse and Sales and Administration. The organogram detailed deputies for all senior positions e.g. the MD would be deputised by the Office Manager.

Job description seen for: Office Manager, Sales and Administration – 003, 21/07/23.

The site receives updates on legislation, scientific and industry updates via Packaging news, certification body newsletters and FSA updates.

N/A Clauses

1.1.9 No requirement to be registered with local authority

2. Hazard and Risk Analysis

HACCP – Issue 004 – Iss: 12/04/24. The HACCP is based on Codex Alimentarius. It covers baking lids, cases and trays that have been manufactured in UK, Italy and China, Sold and distributed through the UK. Clean and dry environment.

Pre-requisites/key processes include – 2.13 (and risk assessed last 02/2024): condition of maintenance, build equipment, handling damages, allergen management, pest management, services and contractors, cleaning, personal hygiene and training.

Scope: Storage and distribute from warehouse primary contact packaging paper baking moulds, plastic lids and grease proof paper. Sold and distributed using subcontracted haulage company and Wholesale (Branded only) of primary and secondary food packaging. Packaging is stored and transported at ambient temperatures, required to be kept out of direct sunlight. Stacking of the products is restricted to 2 pallets high. Returns are immediately quarantined until further advice from the MD

There is a multi-disciplined team including:
 Team Leader - AN – Office Manager – responsible for the intake, storage, handling and dispatch, 15 years with the business. JE – Managing Director – many years’ experiences in the food packaging. External HACCP training was carried out by Technical Consultant Peter Smith – 19/02/09 for all scheme members.

The supplier and customer are responsible for supplying the site with any relevant details in relation to risk for the products. These requirements are spread throughout the SOP and customer contracts. Conformity of packaging was seen to cover:

- Supplier E - is in conformity with: -
- CE 1935/2004 Regulation concerning migration, labelling and traceability of materials and articles intended to come into contact with food.
- CE 2023/2006 Regulation concerning the good manufacturing practice for materials and articles intended to come into contact with food.
- DM 21/03/1973, Chapter. IV and following updating and amendments.

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DPR 777/82 and following updating and amendments.
 BRC Global Standard for Packaging and Packaging Materials Issue 5
 UNI EN ISO 9001:2015 Quality Management System
 Kosher Certification
 UNI EN 11743:2019 Determining the recyclability parameters of cellulosic materials and products
 CEN EN 13430:2004 Requirements for packaging recoverable by material recycling
 CEN EN 13431:2004: Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value
 ISO 14855-1:2005: Determination of the ultimate aerobic biodegradability of plastic materials under controlled composting conditions
 Supplier - P
 ISO 9001 for quality management
 ISO14001 for environmental management
 BRCGS-6 for Packaging Materials
 ISO50001 for energy management
 ISO 45001 for occupational health and safety
 FSC® C108797
 Supplier L
 • Regulation 1935/2004/CE
 • Regulation 10/2011/UE (in the terms defined in Art. 22 "Transitional arrangements" and 23 "Date effective from and application") and subsequent amendments and modifications
 • Regulation 2023/2006/CE
 and with the following Italian legislations:
 • Ministerial Decree 21/03/73 and subsequent amendments and modifications
 • Presidential Decree 777/82 and subsequent amendments and modifications

Process flow described: Goods receipt, handling, storage and quarantine, Items picked & despatched and returns – The verification of the product flow was carried out as part of the HACCP review 04/04/25.

The site has used a risk assessment – severity versus likelihood – 2.11 – 31.03.2025
 Hazards considered for all processes including service providers and subcontractors. – Currently only using one service provider (Bxxxxx Txxxx). Contracts in place.

Potential product harms considered include:
 Physical (Glass, splinters, dust, pests, rain and damage to pallets), Chemical (product tainting, spillage, cleaning chemicals), Cross-contamination, Allergens (cross-contamination of loose product or outer packaging by allergenic products), Hazards associated with additional modules, Hazards mandated by customers or regulatory authorities, Microbial, Adulteration, Fraud, Malicious contamination.

Control measures listed including – cleaning schedules, approved contractor, handling
 Site has no CCPs. Hazards are controlled by prerequisites.
 HACCP meetings are planned annually – minutes available and seen for the last review: 28.03.2025.
 Hazards considered for all service providers and subcontractors. Contracts are in place and seen.

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NC 2.3 The HACCP team leader was last trained in HACCP in 2009 by a consultant with no recent evidence of any formal HACCP training.

N/A Clauses

- 2.11 No CCPs
- 2.12 No CCPs

3. Product Safety and Quality Management Systems

Paper and quality manual in place containing work instructions. Document control is managed by the Office Manager and there is a SOP in place – S3.1.2.4A – 19/8/21. All changes are recorded on the document change record S3.1.2.3a and all current live documents are on the main PC system and communicated to users. This includes an obsolete documents procedure. Document Change Record S3.1.2.3a viewed Fraud Vulnerability Plan ref S3.5.3.1a v 5 issue date 30.09.2025.

The site keeps all documents in the office for a year and then they move to archive onsite.

Internal audits are undertaken to a schedule: audit schedule – 2025 (3.2.1a) is process driven and based on risk with at least 2 audits spread throughout the year. Audits incorporate: All sections of the BRCGS S&D Standard, Monthly Fabrication, Monthly FLT (Fork Lift) and Monthly / Quarterly “other” audits. Records were reviewed for: Senior Management Commitment 2.4.25 by AN (0 NC), HACCP 28.03.25 by AN (0 NC), Section 7 by AN (0 NC)

Internal auditor training e.g. AN – 17/03/09 by P. Smith, independent from areas audited.

Internal audit reports contain evidence of conformity, non-conformity and objective evidence.

Monthly Fabrication & Building Inspection Audits are completed and seen for: 19.08.25 01.07.25, 18.06.25 with no NCs raised. These audits are carried out monthly.

In the event of NCs being raised, the site documented NCs on Form 3.2.4a, Iss: 1 which identified NC, CA, Verification, RCA and PAP. Non-conformances are allocated with a timescale and root cause analysis completed.

Control of Non-Conforming Product from 11.04.2025 no NC41 Silicon Base found multiple units compromising their structural integrity manufacturer contacted root cause failure to maintain correct pitch step in bottom reel of the panettone wrapping cause by incorrect adjustment in the paper transport mechanism. A photocell that reads the bottom at the point on the side of bottom where the cut is generated and was closed off 20.04.25.

Customer specific requirements detailed in individual agreements: these are fully confidential. The KPIs in section one is relative to this.

There is a documented procedure in place for supplier approval – 3.5.1.1a – 03/08/21, Iss: 001.

Supplier Approval and review was 05/2024 – S3.5.1.4a, Iss: 2. Each service supplier is risk assessed and seen for:

Broughtons Transport (Signed Agreement Compliance data for Transport provider Bxxxx Txxxx available including Contract complying with the requirements of the BRCGS issue 4 including vehicle operating standings, vehicle and load security, segregation controls to avoid cross contamination vehicle management, control of sub-contractors and informing the customer of any significant changes signed by both parties on 26.06.25, produces and HACCP available from subcontractor, as

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was RHA certificate membership no 0027784-000, Bxxxxx Txxx was approved on M20023 and was last reviewed 6.6.25 next due review June 2028.

Site currently only uses 1 Transport provider Bxxxxx Txxx

Toyota (Fork Lift – Maintenance Agreement – Signed 16/10/20 reviewed – 03/2025,
 DPD Courier – 05/2022,
 Abee Pest Control (NPTA Membership No: 0997 & BPCA Exp: 28/02/26) – 03/2025
 Approved Service Suppliers (S3.5.2.4a, Iss: 4, 22/07/24)
 Approved Supplier List – S10.2.1.1d, Iss: 3, 25/08/23 –

Specifications are reviewed regularly, and this is driven by the customer request, the site is in a sense a middle man between the supplier and customer- spec reviewed for trace product: Specs reviewed for Greaseproof Paper – Kendon Packaging Feb 2024, Paper Pie moulds Pillopak Feb 2024. Supplier risk assessment on packaging supplier S3.5.31b v 5 Feb 2024 Reviewed April 2025 and Sept 2025.

VACCP and TACCP plan is in place – S3.5.3.1A – 19/02/24 – Iss: 004 – This is reviewed annually e.g. 4.4.25. This covers all product groups and the units on site. There have been no risks found associated with the sites, staff, security or product vulnerability. Information is based mainly on trading relationships and nature of the products.

The site procedures ensure all products are traceable from intake, through the warehouse, and to dispatch to the final customer. Inventory records are kept and full traceability for damages/returns. Traceability Process and procedures were captured in 3.6.1b, Iss: 2.

A traceability challenge was conducted during the inspection using the live system/paper system. A trace was set and performed on: Lotus Cups Muffin Case Product Code 916050TF received 196 boxes on 15.08.25 from Supplier Exxxxx Italy PO no G4502. All dispatch same day to Customer Rxxx Customer PO AP0034559 -1 shipped on 15.09.25 Delivery No 33318. Records received Includes Supplier PO dated 7.08.25 Lot Z2506000013 Exxxx Italy, Packing List dated 7.08.25 Invoice no A 251821 CMR 7.8.25 Stock sheet and Goods Out record Customer Rxxx despatched 15.09.25, VAT Invoice 15.09.25 Delivery note 15.09.25196 cases Proof of delivery from Transport Company 15.09.25 Bxxxx Txxxxx Ltd arrived 17.09.25 11.24hrs including signature from customer. Packaging Specification 916050TF Lotus Cup dated 20.06.25, Declaration of Compliance dated 7.04.25, Migration Data 12.12.23. Compliance data for Transport provider Bxxxx Txxxx available including Contract complying with the requirements of the BRCGS issue 4 including vehicle operating standings, vehicle and load security, segregation controls to avoid cross contamination vehicle management, control of sub-contractors and informing the customer of any significant changes signed by both parties on 26.06.25, produces and HACCP available from subcontractor, as was RHA certificate membership no 0027784-000, Bxxxxx Txxx was approved on M20023 and was last reviewed 6.6.25 next due review June 2028. RA ref 3.5.2.2b, Packaging Supplier BRCGS site code 2082146 expires 19.03.26

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The site carry out one traceability challenge each year (18/08/25) – last carried on: Brown Silonconised Pie Mould 5 Boxes (x 900units) – Lot No.: Z2411000238. Customer PO No: 119074. All 5 boxes could be accounted for and were dispatched to Customer L (Invoice: 119074) – 29/07/25.

Site have documented procedure for product withdrawal and recall (3.7.1b, Iss: 4, 03/08/23) including systems in place to formally notify the owner/manufacture when their products are involved within 3 days.

Customer Phone List was available in S3.7.1c, 22/07/24.

The site has had no recalls/withdrawal.

Last recall test was carried out on (18/08/25) – last carried on: Brown Silonconised Pie Mould 5 Boxes (x 900units) – Lot No.: Z2411000238. Customer PO No.: 119074. All 5 boxes could be accounted for and were dispatched to Customer L (Invoice: 119074) – 29/07/25. All could be accounted for.

Business continuity and incident response procedure – incident reporting procedure – S3.8.1a – 25/07/22 – Iss: 003. Goods are held pending investigation.

Procedure includes the requirement to contact the CB within 3 days.

Control of non-conforming product procedure was in place – 3.6.3a and also non- conforming product procedure — and an NCR report S3.9.1 (Example seen for 11.04.2025 no NC41 Silicon Base found multiple units compromising their structural integrity manufacturer contacted root cause failure to maintain correct pitch step in bottom reel of the panettone wrapping cause by incorrect adjustment in the paper transport mechanism. A photocell that reads the bottom at the point on the side of bottom where the cut is generated and was closed off 20.04.25. The process includes the use of root cause analysis if the product is at risk. There is a quarantine label in place – S3.9.1c.

Procedure in place for non conforming products. All products dispatched directly to the consumers. Returns would typically in such cases involve credits being given to consumers. Any damage would be written off the system if required – Quick books and credit be issued etc if required. Any damage would be written off the system if required.

Complaints procedure – SOP – S3.10.1.A – 001 – 03/08/21

Complaints are managed case by case basis as per each online retailer’s procedures, typically would be missed orders. Site stated that no complaints received in the last 12 months.

Root cause analysis would be carried out and discussed at management review, but there have been no complaints for this year.

NC 3.2.2 The HACCP Team Leader carried out the internal audit on HACCP and therefore was not independent from the area.

N/A Clauses

3.5.3.2 Low risk

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4. Site and Building Standards

The site was located on an industrial estate outside of Melksham. The site occupied one of the units of the estate and was a purpose-built ambient warehousing facility with car park at the side facing another row of warehouse units facing opposite side. There were no adverse local activities. External pathways, roadway and car parking were smooth and undamaged. External drainage was suitable.

There is a security risk assessment for the site – S4.2.1a – Iss: 6 – 19/07/22 (Reviewed 04/04/25) and includes secure windows, IT systems, alarms and locked doors. This is annually reviewed. The site has an alarm system and these are linked to a text system to send the MD. Site security measures included intruder alarms, locked doors. Visitors were required to contact reception, enter and walk up the stairs and also have no access to any part of the warehouse. Visitors are escorted.

The alarm was armed during the audit for the neighbour site warehouse. Staff are trained in site security.

VACCP and TACCP plan is in place – S3.5.3.1A – 04/04/25 – Iss: 004 – This is reviewed annually. This covers all product groups and the units on site. There have been no risks found associated with the sites, staff, security or product vulnerability. Information is based mainly on trading relationships and nature of the products. Reviewed 04.04.25.

The site had a plan of the site 10/06/24 covering various aspects of the business inc.: Access points for personnel, travel routes, staff facilities, routes for the removal of waste, process flows, storage areas (ambient only), chemical handling areas.

The premises were adapted for their intended use. Product flow was linear with goods in and dispatch located at the covered bay on the front of the building: order preparation and storage in the middle: there was a horseshoe process flow. Site had defined segregated areas for picking / collation, and for the storage of goods, cleaning chemicals and electric forklift battery charging area.

Fabrication was maintained in good condition in all areas. The floor was sealed concrete and lights were protected and were suitable. Walls were brick or corrugated. Pest proofing was in place. Glass is suitably protected. Water was potable and from the local authority. Building fabrications is monitored through Fabrication & Building Inspection Audits are completed and seen for: Feb-Aug 2025 with no NCs raised. These audits are carried out monthly.

A small kitchenette was provided with fridge, microwave oven for staff for breaks, personal items are stored in the office or under a staff staircase. Toilets were provided and with hand washing facilities, liquid soap, hand towels and signage

N/A Clauses

- 4.3.7 No requirement for segregated cleaning facilities
- 4.3.9 No temporary structures
- 4.4.3 No requirement for drainage
- 4.4.5 No building voids
- 4.5.4 No catering facilities

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5. Vehicle Operating Standards

No vehicles are operated by the business. Vehicles are checked for condition prior to loading / unloading.
 Vehicles were assessed before loading to ensure they were in a clean condition, no exposed insulation, door seals were intact, no evidence of pest activity, drain holes (if present) prevented pest entry, free from strong odours and humidity. Additionally, checks were made and records were reviewed from the traceability challenge

- 1) Ensuring there were no loose items / damaged panels / projections.
- 2) Ensuring there was no rain / damp ingress,
- 3) The load area was well maintained and facilitated cleaning,
- 4) Lashing Points / Load Lock Straps and Fastenings were maintained in a good condition.
- 5) Rear Door Shutters / Tail Lifts were in good order

N/A Clauses

5.1.6 – 5.1.8, 5.2.1, 5.2.3-5.2.6, 5.3, 5.4 – No vehicles / transport on site

6. Facility Management

The site had one forklift truck. Servicing by Toyota aftersales agreement 22/4/21 – Last Thorough Inspection carried out 14.11.24 serial no E10522-7fbest13service

Pump Trucks were also used and serviced by Chadwick Materials Handling Ltd., Monthly FLT (S6.2.1a, Iss: 1, 26/01/21) and reviewed for: Feb - Sept 2025.

There is no racking on site and the mezzanine is not in use.

Pallets are suitably covered if there is an issue with rain outside. Wooden pallet toppers are available for this. Only one knife was used: this was marked and only lived in one area.

There is a maintenance programme – 6.2, 05/08/21, Iss: 001. Site uses contractors for maintenance e.g. forklifts: Toyota (Fork Lift – Maintenance Agreement – Signed 22/04/21 – Last service recorded 18/07/25) – The safety, legality and quality of products are protected during maintenance.

This includes the cleaning or replacing of light fittings and glass. Conducted by approved suppliers and in cordoned off areas as required, or outside core working hours. Contractors are made aware of site operating, hygiene, and contamination control procedures as part of the contract and via sign in procedures detailed in the quality manual and initial instructions when coming on site. No temporary repairs were noted.

The site has a series of cleaning schedules which cover the whole of the site and recorded on S6.4.2a. The onsite staff carry out the basis dry cleaning. The Office Manager was responsible for the cleaning of the whole site inside of the warehouse. The warehouse was the responsibility of the warehouse staff and records were reviewed for the weekly/daily/monthly clean which is inspected on a daily basis. Records reviewed for: Units A3 & A4 – 2024 YTD. Effectiveness of cleaning is confirmed via visual inspection. Viewed signed 15.07.25, 21.10.25, 14.10.25, 07.10.25

Systems are in place to minimise the accumulation of waste in handling and storage areas

For branded product which needs to be destroyed, the site uses a company/licenced contractor – Woods. General waste is removed by site personnel and taken directly to the refuse collection areas

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in Melksham.

The pest control was contracted out to Abee - NPTA Membership No.: 0997 & BPCA Exp.: 28/02/26. Service covers 8 visits per annum (rodents and insects) with contract in place: original date 2017 and reviewed annually (Last: 01/10/25). There is a risk assessment in place – 01/10/25. Last routine visit – 19.08.25, 11.03.25, 29.11.24. Infestations are dealt with immediately. EFks were looked after by the company. A Bait plan in place dated 06.05.25.

The site performs checks on the EFks during pest controller visits. Shatterproof bulb – purchased 13/10/21. Bulbs changed Nov 2024. There is a trend analysis carried out. No pest issues were evident during the inspection. No activity identified 2024 YTD. Staff are made aware of pest activity through the staff induction / handbook and is reviewed annually 11/2023 – Procedure 6.6.1a, Iss: 1, 11/03/22. Goods are stored appropriately and off the floor. The site has had an annual biologist survey which was last carried out 1.10.25.

N/A Clauses

- 6.1.2 No racking on site
- 6.1.3 No diesel handling equipment
- 6.1.4 No automated systems
- 6.3 No requirement for monitoring or measuring devices
- 6.4.4 No CIP in use on site
- 6.4.5 – 6.4.6 No surplus
- 6.6.7 The site does not undertake its own pest control

7. Good Operating Practices

Products delivered to site and stored in the warehouse and kept wrapped. Products were checked, put away and picked as per consumer orders: packed into parcels and collected by couriers or hauliers.

Goods are checked on intake and all details noted on S7.2.1B: this includes condition, works order, seal intact, haulier, tamper free and La Moderna consignment. It also includes the manufacturer date and traceability code.

Order preparations procedures covered picking – to ensure products picked correctly are visually inspected on loading. Products are away from walls and off floor on pallets. Staff are trained in loading/unloading.

Physical and chemical product contamination risks have been considered and procedures documented e.g. Glass Policy 7.4.1, Iss: 2, 26/07/22. Procedures required processes to be stopped and to notify a supervisor or manager: to place potential affected items on hold: to remove or protect unaffected items: to clean up (by manager) using dedicated tools: to remove and throw away affected products in bins outside. There is a glass breakage procedure S7.4.1a, 21/09/21, Iss: 001 and a spillage and breakage report 7.4.2a, Iss: 1, 21/09/21. Glass is excluded from the area where possible. Weekly glass and hard plastic check which also includes the condition of knives used onsite: reviewed for 2025 YTD. All records were on the register S7.4.1b – Units A3 and A4 reviewed. Cleaning chemicals are fit for purpose, suitably labelled and stored in the one designated area and

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used in accordance with manufactures' instructions.

Stock control is carried out visually and a count kept and managed based on what is held.

No product release requirements. There are no allergens handled on site.

N/A Clauses

- 7.1.4 No shelf life
- 7.3 There is no requirement for environmental control
- 7.6 No product release requirements
- 7.7 There are no allergens handled on site

8. Personnel

All staff are trained on induction (and employee handbook) Annually 07/11/23 – SOPs are all trained annually to all members of staff.

Examples reviewed e.g.

Site Security SC, AN, JE on 04.04.25

SC Quality Policy, Company Hygiene Rules, Cleaning 28.11.14

AN – Forklift truck training – 06/01/20 – FLTA – Cert no 2173, HACCP by Consultant 19.2.09.

JU Internal Auditing Training 15.11.21

Induction – 12/10/22

Training is reviewed at a minimum of annually

There is a matrix in place – 8.1.1.b – 16/11/21 and the last appraisal conducted 29/11/24.

The site only handles packaging and no CCPs have been identified

Employee handbook and training programme detailed all relevant procedures includes hygiene rules, quality policy & allergens. This is annually reviewed using the handbook and all staff training completed on 07/11/23.

Company Hygiene Rules were available at the entrance to the site.

Personal hygiene policy – S8.2.1a, Iss: 1, 24/09/21. There is no set requirement to wear PPE.

Smoking is permitted in a designated area only. Food and drink are not permitted in storage areas.

Return to work system and sickness reporting in place. Visitors required to complete a health questionnaire prior to site entry. Personal medicines kept with belongings. Coloured plasters are provided.

N/A Clauses

- 8.1.4 No CCPs

9. Handling of open food products

Not applicable

N/A Clauses

Click or tap here to enter text.

10.1 Wholesaler Module

The site procedures ensure all products are traceable from intake, through the warehouse, and to dispatch to the final customer. Inventory records are kept and full traceability for damages/returns.

Traceability Process and procedures were captured in 3.6.1b, Iss: 2.

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A traceability challenge was conducted during the inspection using the live system/paper system. A trace was set and performed on: Lotus Cups Muffin Case Product Code 916050TF received 196 boxes on 15.08.25 from Supplier Exxxxx Italy PO no G4502. All dispatch same day to Customer Rxxx Customer PO AP0034559 -1 shipped on 15.09.25 Delivery No 33318. Records received Includes Supplier PO dated 7.08.25 Lot Z2506000013 Exxxxx Italy, Packing List dated 7.08.25 Invoice no A 251821 CMR 7.8.25 Stock sheet and Goods Out record Customer Rxxx despatched 15.09.25, VAT Invoice 15.09.25 Delivery note 15.09.25196 cases Proof of delivery from Transport Company 15.09.25 Bxxxx Txxxxx Ltd arrived 17.09.25 11.24hrs including signature from customer. Packaging Specification 916050TF Lotus Cup dated 20.06.25, Declaration of Compliance dated 7.04.25, Migration Data 12.12.23. Compliance data for Transport provider Bxxxx Txxxx available including Contract complying with the requirements of the BRCGS issue 4 including vehicle operating standings, vehicle and load security, segregation controls to avoid cross contamination vehicle management, control of sub-contractors and informing the customer of any significant changes signed by both parties on 26.06.25, produces and HACCP available from subcontractor, as was RHA certificate membership no 0027784-000, Bxxxxx Txxx was approved on M20023 and was last reviewed 6.6.25 next due review June 2028. RA ref 3.5.2.2b, Packaging Supplier BRCGS site code 2082146 expires 19.03.26

The site carry out one traceability challenge each year (18/08/25) – last carried on: Brown Silonconised Pie Mould 5 Boxes (x 900units) – Lot No: Z2411000238. Customer PO No: 119074. All 5 boxes could be accounted for and were dispatched to Customer L (Invoice: 119074) – 29/07/25.

Site have documented procedure for product withdrawal and recall (3.7.1b, Iss: 4, 03/08/23) including systems in place to formally notify the owner/manufacture when their products are involved. Customer Phone List was available in S3.7.1c, 22/07/24.

The site has had no recalls/withdrawal.

Last recall test was carried out on (18/08/25) – last carried on: Brown Silonconised Pie Mould 5 Boxes (x 900units) – Lot No.: Z2411000238. Customer PO No.: 119074. All 5 boxes could be accounted for and were dispatched to Customer L (Invoice: 119074) – 29/07/25. All could be accounted for.

Business continuity and incident response procedure – incident reporting procedure – S3.8.1a – 25/07/22 – Iss: 003. Goods are held pending investigation. Procedure includes the requirement to contact the CB within 3 days.

N/A Clauses

None

10.2 Branded Products

Approved Service Suppliers (S3.5.2.4a, Iss: 4, 22/07/24)
 Approved Supplier List – S10.2.1.1d, Iss: 3, 25/08/23 – and reviewed for:
 Supplier E – BRCG site code 2082146 Packaging Exp.: 19/03/26
 Supplier SW – BRCGS site code 212319 Packaging Exp.: 28/11/25
 Supplier P – BRCGS site code 8470798 Packaging Exp.: 05/01/26.
 Supplier B – BRCGS site code 2093721 Packaging Exp.: 18/10/26.
 Supplier Q – China FFSC 22000 Cert no CN22/00004254

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Specifications are reviewed regularly, and this is driven by the customer request, the site is in a sense a middle man between the supplier and customer- spec reviewed for trace product: Specs reviewed for Greaseproof Paper – Kendon Packaging Feb 2024, Round Pie Mould pure virgin fibre Grease Proof golden paper treated with silicone on internal side 25.05.23, Greaseproof fluted board 227 23.09.25, Brown Paper Folding Baking Cas 19.1.23, Golden Round Baking Case 29.04.25 Multibake Double Sided Bleached Silicone Greaseproof 15.12.22
 Supplier risk assessment on packaging supplier S3.5.31b v 5 Feb 2024 Reviewed April 2025 and Sept 2025

VACCP and TACCP plan is in place – S3.5.3.1A – 19/02/24 – Iss: 004 – This is reviewed annually eg 4.4.25.

This covers all product groups and the units on site. There have been no risks found associated with the sites, staff, security or product vulnerability. Information is based mainly on trading relationships and nature of the products.

N/A Clauses

None

10.3 Other Wholesale Operations

Not applicable

N/A Clauses

Click or tap here to enter text.

12. Ecommerce

Not applicable

N/A Clauses

Click or tap here to enter text.

13. Contractual arrangements (all services)

Not applicable

N/A Clauses

Click or tap here to enter text.

14. Product Inspection

Not applicable

N/A Clauses

Click or tap here to enter text.

15. Contract Packing (Repacking, Assembly Packing)

Not applicable

N/A Clauses

Click or tap here to enter text.

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16. Quantity Control Inspections
Not applicable
N/A Clauses
Click or tap here to enter text.

17. Contract chilling/freezing/tempering/defrost and high-pressure process operations
Not applicable
N/A Clauses
Click or tap here to enter text.

18. Contact Cleaning of baskets, roll cages and other distribution containers
Not applicable
N/A Clauses
Click or tap here to enter text.

19. Waste recovery and recycling
Not applicable
N/A Clauses
Click or tap here to enter text.