

**Achieved grade**

AA

**Product categories**

01, 02

**Audit programme**

Announced

**Date(s) of audit**

16 February 2023

**Certificate issue date**

10 April 2023

**Re-audit due date**

16 February 2024

**Certificate expiry date**

29 March 2024

**Auditor number**

20692

**FoodChain ID® Certification L.C.**

ANAB ACCREDITED CERTIFICATION BODY NO.0969

**certifies that, having conducted an audit at**

Griffin Foods  
Site Code: 10007995  
Unit 5B, Plato Business Park  
Damastown  
Dublin  
D15 E832

**Meets the requirements set out in the**  
BRCGS FOR STORAGE AND DISTRIBUTION  
ISSUE 4: NOVEMBER 2020

**For the scope of activities**

The storage and order picking of ambient stable raw materials and frozen food ingredients for the bakery and confectionary industry and wholesaling of ambient stable raw materials for the bakery and confectionary industry.

**Exclusions from scope**

Home Baking Supplies for e-commerce

Storage and  
Distribution

CERTIFICATED

**Authorised by:**

Nate Ensrud  
Vice President, Technical Operations

**Certificate Traceability Reference – 2460046 UK5532**

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Issued by – FoodChain ID Certification Ltd • First Floor, Unit 50, Drayton House, Drayton Manor Business Park, Coleshill Road, Tamworth, B78 6TL

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**Audit Report**

Choose an item.

Global Standard for Storage and Distribution Issue 4: May 2021

1. Audit Summary			
Company name	Griffin Foods	Site Code	10007995
Site name	Griffin Foods		
Scope of audit	The storage and order picking of ambient stable raw materials and frozen food ingredients for the bakery and confectionary industry and wholesaling of ambient stable raw materials for the bakery and confectionary industry.		
Exclusions from scope	Home Baking Supplies for e-commerce		
Justification for exclusion	Site not selected e-commerce		
Audit Start Date	2/16/2023	Audit Finish Date	2/16/2023
Re-audit due date	2/16/2024	Audit result	Certificated
Certificate issue date	4/10/2023	Certificate expiry date	3/29/2024
2. Audit Results			
Audit grade	AA	Audit Programme	Announced
Previous audit grade		Previous audit date	
Number of non-conformities	Critical		0
	Major		0
	Minor		4

Additional modules included		
Modules	Scope	Exclusions from Scope
10 Wholesale Module	Wholesaling of ambient stable raw materials for the bakery and confectionery industry	None

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### 3. Product Characteristics

Product categories	Activities
01 - Chilled and Frozen Food 02 - Ambient Food	01 - Storage 04 - Wholesale Module

### 4. Company Details

Address	Unit 5B, Plato Business Park Damastown  Dublin  D15 E832		
Country	IRELAND	Site Telephone Number	01 8263960
Commercial representative Name	Gemma Mulrooney	Email	Gemma@Griffinfoods.ie
Technical representative Name	Des Slaughter	Email	technical@griffinfoods.ie

### Additional Locations

Site Name	Address	Activities

### 5. Company Profile

Plant/Warehouse size (sq. m)	10-25K sq.m	No. of employees	1-50	No. of Vehicles	0
Subcontracted processes	No	Regions exported to	Europe		

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5. Company Profile			
Other certificates held	None		
Major changes since last BRCGS audit	First Time Audit		
Griffin Foods is located in Damastown Dublin in Plato business park, the facility is 11,000m2 and employ 8 people. Griffin Foods is in business for approx. 20 years.			
6. Audit Duration Details			
Total audit duration	7	Site & vehicles audit duration	3
Reasons for deviation from typical or expected audit duration	Organised site with small number of employees		
Next audit type selected	Announced		

Audit Duration per day		
Audit Date	Start Time	Finish time
2/16/2023	08:30	15:30

	Auditor Number	Name	Role
Auditor Number	20692	John Dowling	Lead Auditor
Second Auditor Number			

Key Personnel					
Name	Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting

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Gemma Mulrooney	General Manager	x	x		
Des Salughter	Technical manager	x	x		

**GFSI Audit History**

Date	Scheme/Standard	Announced/Unannounced

**Document control**
**Certification Body**

FoodChain ID Certification L.C.

500 N. 3rd St., Suite 204

UNITED STATES

**CB Report number** P1F08SD UK5532

**Template Name** SD406 Storage & Distribution Audit Report Template v3

**Standard Issue** 4 **Template issue date** 2/15/2022

**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 deputy for the HACCP team leader was not clearly documented	Document QH1 has been updated in section 4.1.2. See new QH1 document attached and minutes of haccp review.	The deputy (GM) is clear in the updated HACCP procedure, agreed and communicated to GM at our review 07/03/23.	RC: The requirement to document the deputy within the RC: HACCP plan	2023-03-08	John Dowling

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Minor							
					had not been implemented due to the site not fully understanding the clause requirements		
2	3.1.3	During the traceability test it was noted that the Goods out Record was not completed for 22314 dispatched on 18/11/22	Staff have been reminded by MS of the need to maintain and store these records more carefully and in a manner which makes record retrieval easier / quicker. See attached meeting minutes.	The training schedule in place will ensure staff are properly trained in goods out procedures including record keeping. Checking of compliance during internal traceability / recall tests and checking compliance by internal audits of record controls	RC: The goods out procedure was not properly followed for order 22314 by the operative RC- and the issue was not picked up due to lack of cross checking by the team.	2023-03-08	John Dowling
3	4.4.4	The site had not tested the water used for hand washing at the point of use	Sampling conducted and testing completed. See attached certificate.	It was considered at our HACCP review and determined that annual checking will be	RC: Site interpretation was that -as we only	2023-03-08	John Dowling

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Minor							
				sufficient. Ref QH2 New (RA) and QH1 New (PRP).	handle packed products, RC: water testing was not considered as part of our regular hygiene and maintenance schedule.		
4	8.2.1	During the site induction there was evidence of eating in the warehouse (Bar wrapper found in forklift), this contradicts the site personal hygiene policy	The forklift has been cleared, see images attached. Staff were reminded by MS that eating in the warehouse is not allowed. See attached meeting minutes.	Condition of forklifts is included in the site hygiene audits and extra vigilance will be put on this area to ensure no reoccurrence.	RC: Failure to observe site rules by the operative. RC- and the issue was not picked up due to lack of cross checking by the team.	2023-03-08	John Dowling

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**Comments on non-conformities**

None

**Head Office Non-Conformity Summary**

**Critical**

No	Clause	Detail	Re-audit date

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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**

**Summary**

There is a Quality Policy Statement Ref: QP1.1.1 (Rev 4- 6/12/21) displayed, signed by the Managing Director (JG) dated 8/2/23 detailing the company's commitment to meeting safety, legal and customer requirements and is communicated to visitors upon arrival as part of the sign in process and staff are informed of the Policy in the canteen and at the reception area.

QM 1.1.4 (Rev 2- 4/8/22)- Food Safety & Quality Objectives detailed and include:

- Reduce complaints year on year as % of orders.- for 2022 1.35% and 1.42% in 2021
- To implement the introduction of Food Safety Culture – Complemented
- To Achieve BRC Certification- On going
- To reduce the number of NC raised during Internal Audits related to damaged products – Min 85% compliance
- To maintain RSPO membership requirements Certification – Ongoing

Objectives are displayed on the canteen notice board and in addition are discussed at Management meetings- Objectives are set annual review and are reviewed quarterly, the last quarterly review occurred 23/1/23.

Management review meetings are held annually and the most recent was held on 25/8/22 and was attended by the Managing Director and senior management team. Agenda included review of previous meetings, review of QMS, review of HACCP, Site Security/ Food Defence. The site is aware of the position's statements and were/ would include and discussed during the review - via BRC participate. The site also holds monthly meetings as per agenda QM1.2.4 (V2- 7/2/23) and relevant minutes reviewed.

Quality Culture is defined in QM 1.1.2 (Rev 1-6/12/21)- Food Safety & Quality Culture at Griffin Foods and 1.1.2 Culture Plan which clearly defines the sites plans and included clearly defined objectives alongside timescales and responsibilities . The site have carried out Quality Culture Questionnaire August 2022 and 9 out of 10 employees at the time responded and the results were correlated and were available for review during the audit , the outcome of the questionnaire has been used to set culture objectives and is documented in section 4 of the plan and include Communication of results to staff , completed 31/8/22, refresher training of warehouse operatives -30/9/22, Publish customer feedback to staff on notice boards 30/9/22 and updated periodically , Staff engagement through a suggestion box , box installed 31/8/22. This box is also used for confidential reporting and staff interviewed were aware of the procedure and a poster is displayed about the reporting system Ref 1.1.2/1.1.5 (V2- 4/8/22)- minutes sighted 9/2/23 and 30/1/23 (form V1- 14/12/21)

This is a relatively small site with a small management team, there are only 18 employees on-site in total most of whom are of long standing.

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The company have hard copy of the Global Standard for Storage and Distribution- Issue 4. The Managing Director attended the opening and closing meeting. The site is registered with HSE, premises reference 454.

Organisation chart Ref: 1.3 (Rev 8- 12/1/23)- deputies noted in job descriptions and in the quality manual. Job descriptions available note responsibilities checked for:

- Managing Director signed 8/3/22.
- General Manager signed 8/3/22.
- Technical Manager signed 8/3/22.
- Warehouse Staff 8/3/22
- Sales & Ordering 8/2/23.

The company keeps up to date with relevant legislation through BRC, FSA Ireland, RASF. The General Manager attended the opening and closing meeting.

This is the site's first BRC audit and as such clause 1.1.10, 1.1.11 and 1.1.12 are not applicable. No non-conformance was raised in this section.

#### **N/A Clauses**

1.1.10, 1.1.11 and 1.1.12- First time BRC Audit

## **2. Hazard and Risk Analysis**

### **Summary**

HACCP system in place based on Codex Alimentarius principles and referencing appropriate legislation and codes of practice- Ref: QH-1 HACCP Intro (Rev 11- 15/9/22)

The HACCP study includes broad range of pre-requisites, document prerequisite procedures noted within the quality management system Ref: QH-1 HACCP (Rev 11- 15/9/22)- PRPs including – Traceability, Pest Control, Control of Non-Conforming Product, Product Withdrawal, Waste Disposal, Transport, Personal Hygiene, Allergen management, Calibration, Physical & Chemical Control, Goods in, storage and goods out (safe handling).

The HACCP team comprises of 4 staff members representing operations and warehouse functions including: The team leader is the Technical Manager holds Level 5 HACCP certificate dated August 17 and TM has trained out the team members on GM (General manager)- 9/2/23, MS (Warehouse Operations Manager) – 9/2/23.- The team are documented within the QH-1 HACCP Intro (Rev 11- 15/9/22)

Nc: the HACCP deputy was not documented.

Certs sighted for: HR (cert 1872)/ DK (cert 1422)/ HC (cert 1424)-all dated 14/9/18 and DK, Managing Director QS development HACCP principles 12/08/14.

The HACCP plan was developed locally. Scope is noted within the HACCP (Rev 11- 15/9/22)

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storage and wholesale activities of Griffin Foods including the process steps of goods intake, ambient/ frozen storage, assembly and palletising, wrapping and labelling and despatch and wholesaling.

Product categories: Chocolate Products , Coconut Products, Milk Powders, Milk Powders, Fruit Fillings, Icings, Seeds, Nuts, Oils & Fats, Fried Fruits, Freeze dried fruits. ( Rev 11- 15/9/22)

There is a documented Flow diagram Ref QH1.1 (Rev 5- 19/1/23) and was verified on 19/1/23. There is also a plan available of the layout of the site -Ref Map 4 and included Flows for people, product and waste.

A fully documented risk assessment is in place for each process, noted on HACCP control analysis table ref: QH0-2 (Rev 8- 15/9/22) hazards noted:

- Microbiological - due to damaged growth due to damaged contaminated product – the site do not handle open product
- Chemical - pesticides, toxins , cleaning chemicals
- Physical - wood, glass, metal, plastic, pests
- Allergen - Due to spillage , or poor supplier control – on site gluten Soya, Egg, Sulphites, Milk, Nuts
- Malicious Contamination -

The following steps were reviewed: Step 1 Sourcing of Ingredients & Suppliers , Step, 4 Intake & GF, Step 7 Dispatch – verified on the HARA .

There is a documented analysis of the potential hazards in order to identify which need to be controlled via a 3x3 likelihood/occurrence table and any step over 6 is put through the two step CCP decision tree. Hazard analysis methodology is outlined in QH-1 HACCP Intro. No CCP's have been identified. Control is via pre-requisites. Pre-requisites noted as pre-requisite programme (PRP)

The HACCP is reviewed annually, last 9/2/22 attended by all HACCP team members, Minutes sighted and included scope review, PRP review and Flow Diagram review. Note the HACCP was reviewed as documented on 15/9/22 and also included in the AGM that occurred 25/8/22

One non-conformance was raised in this section of the standard.

Minor Nc No 2.3-The deputy for the HACCP team leader was not clearly documented

#### **N/A Clauses**

- 2.5 -The HACCP plan was developed locally.  
2.11/2.12-No CCP's have been identified

### **3. Product Safety and Quality Management Systems**

#### **Summary**

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The company has a Quality Manual that covers all the requirements of this standard and includes references to procedures includes a HACCP Manual and SOPs . A document control system is in place QM 3.1.2 (Rev 3- 4/10/22) and 3.1.3 (Rev 3- 4/10/22). Record completion was generally satisfactory, and retention times are defined within the Quality Manual as 3-6 years; the longest shelf-life product is 2 years.

Changes to documents are recorded on the document control log, controlled by the technical department, document control system Example of updates to documents:

•QM 3.1.2- Document Control – reason for change was inserted foot note and ceases using excel log- dated 4/10/22.

Procedure for obsolete documentation is included within the document control procedure. Where records are electronic (accounts/ MRP system) theses are backed up daily.

Internal audit procedure QM3.2.1 (Rev 1- 4/10/22) schedule in place covering the BRC standard , the schedule included a RA and is dated 13/2/23 Ref 3.2.1 2023/2024. All audits are conducted annually ana cross two different dates completed in Q1 and Quarter 4 . Site has determined that GF is low risk as there is no open food handling.

Internal audits are carried out by one employee (DS) and one external support (FF) who have received training – certs sighted FF 7th/8th 2021. DS only does Housekeeping and external standards., auditors are independent of areas audited.

Audit reports include evidence of conformity as well as non-conformity. Reports can include photographs. Non-conformances assigned to corrective action record with associated timescales for completion of corrective actions.

Audits reviewed:

- Section 1 audited by FF on 7/2/23- 1 NC raised and two recommendations.
- Section 3 audited by FF on 7/2/23- 6 NC raised and two recommendations.
- Section 8 audited by FF on 7/2/23- 0 NC raised.
- Section 10 audited by FF on 13/2/23- 0 Nc raised.

No non-conformances identified the audits listed above. A report format is in place if NCs are identified either through I auditor and NC Log – Excel based – The Nc detailed above were sighted in the Log – Log includes action taken, responsibility and time scales/ status.

The site also inspections (Hygiene/ Fabrication)- Quarterly as per scheduled an RA and site use an APP I Auditor – report sighted for 9/1/23 with a score of 85.9%. The site previously paper-based system (Rev 3- 9/11/21) egg report sighted dated 30/6/22. The site conducts quarterly glass audits, this is also done on the APP and was previously paper based - report sighted for 24/1/23 with 96.49 % compliance with 2 issues noted – the following points were verified- Entrance x Clock , IE20- 5x Strip Lights

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Products generally have no special handling requirements., with the exception of Frozen Dairy Cultures (These product are stored for one specific customer only , whom manage sales and GF arrange transport). However, if customers require special instruction this is noted in the customer agreement i.e., supply of C of A with each delivery (Supplied by Manufacturer).

Systems are in place for corrective and preventive action Ref. QM 3.3 (Rev 2- 16/1/23)  
Corrective action detail noted within the non-conformance log, corrective action detail/action noted. CA sighted for NC raised in Internal Audits, and housekeeping audits the following example was sighted No 66- 13/2/23, Damages on arrival form OV , 1 bloc noted and disposed off closed out 20/2/23, RC damaged during transport , CAPA; Supplier informed and ongoing monitored and trended. The excel file includes the use of Root cause and CA, Target date, completion date and verified by.

Procedure in place relating to customer contractual arrangements ref: QM 3.4 (Rev 3- 6/10/22), customer specific requirements document, - the site has two CA one for OV and one for BC

This document each customer, and their specific requirements. such as BC if temp raises above 25c action is to be taken and OV require Frozen Storage- sighted for BC 10/1/22 and for OV various guidelines such as FAQ for Cultures- dated 2021

The majority of Products generally have no special handling requirements. However, if customers require special instruction this is noted in the customer agreement i.e., supply of C of A with each delivery.

Potential customer specific requirements which have been documented are:

- COC or COA on delivery or as required
- RSPO Palm Products Only

Specific instructions are included in the Intact system (MRP System) – example sighted for Traced product Milk Choc to customer MF – Tail lift required as no forklift on site. This information is included on the delivery notes which are given to the warehouse team.

All Products belong to GF, except for products for OV (as described above), OV has agreed all handling requirements from the supplier as listed above. There is a documented system for purchasing and supplier approval, Ref: QM3.5 (Rev 2- 20/9/22) covers products and suppliers and services/ sub-contractors ( Hauliers)Ref 3.5.1 (Rev 3- 16/1/23)

Supplier approval based on GFSI, and the site complete all suppliers are rated as Low risk where GFSI certification is held. There is one supplier who does not hold GFSI, and the site have conducted a RA for JH , the RA includes Allergens, Biological, Chemical, Physical , Fraud & Adulteration / Malicious Contamination – the RA was last completed 23/1/23 with an overall rating as Low. Where supplier is GFSI certified they do not have to complete a SAQ Ref QR02 (Rev 2- 17/5/18)

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The following suppliers were reviewed.

- JH- Carmel – Rated as Low Risk- 23/1/23 and SAQ -21/9/22- Spec. Natural Thick Caramel Sauce- 25/4/22.
- BC- Chocolate Milk – Rates as Low Risk GFSI certified – FSSC Expiry 28/6/24- Spec -22/3/21.
- BC- Chocolate Rolls/ Decorations – Rated as Low Risk, GFSI certified – FSSC- Expiry 21/8/24- Spec – 2/2/22.
- Dried Fruit – Raisins – Rated as Low Risk, GFSI certified BRC Site Code 1352266- Expiry: 16/6/23- Spec 20/12/21.
- Skimmed Milk Powder – rated as Low Risk , GFSI certified BRC Site Code 1003829- Expiry 3/5/23 , Spec 25/6/21.

In order for a supplier to become an approved supplier a sample of the new material including specifications, (incl. allergen details) are requested Once ability is shown the new supplier must as a minimum provide a valid 3rd party certificate, or site RA , COA or COC and relevant specification to be included on the approved supplier list.

Approved supplier list in place, Ref: Spread Sheet – Dated Feb 23. The majority of suppliers are long standing suppliers and all suppliers are rated Low risk

Procedure in place for monitoring of suppliers, Ref: QM3.5 (Rev 2- 20/9/22) A list is in place of all approved suppliers, services all are reviewed on an annual basis and was last completed on 17/11/22- Performance review document reviewed for all suppliers and services – and included any complaints etc.

The following service suppliers were reviewed:

- Pest Control – 30/4/21
- General Waste – NWCPO-13-11193-06- Expires 20/1/25

There are 8 subcontractors for distribution. Service agreement reviewed for SE (31/1/23) and Geodis ( 24/1/23), and DT – BRC Site Code: 1614264- Expiry 23/12/23( Chilled) ( only used for chilled only) all are included on the approved supplier list for transport Doc 3.5.0 (R2). Documentation notes industry codes of practice, breakdown procedure and security of loads – all requirement of the BRC standard have been considered- Griffin Foods Code of Conduct ( GFCOP1 (Rev 4- 3/1/23) –the agreement included all relevant requirements to BRC Issue 4 (Vehicle Standards/ Vehicle Security/ Vehicle management/ Temp Controls (where applicable), Training/ Maintenance/ Cleaning.

The site has a documented Food Fraud & Vulnerability Assessment Ref: 3.5.3.1 dated 18/10/22) and was completed/ verified on 18/10/22- All suppliers/ services have been classified as low risk – This document is reviewed annually as part of the senior management review.

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Traceability is computer based Intact as detailed in procedure Q3.6 (Rev 5- 16/1/23), The site carries the manufactured traceability/ BBD forward. All, product sighted had traceability information attached and maintained. The site use PO numbers from customers to trace products back.

The site conduct traceability tests minimum annually, however they do many more due to customer requests .The latest check conducted 2/2/23 as part of the mock recall exercise . – Product selected was Honeycomb – Key timings recorded on 3.7.1 (Rev 3- 20/10/22)- Scenario was Potential glass in the product. Start time 10:00 , finish time 11:10. The file included all associated records and included a mass balance (30 units- received on 10/5/22- and 12 remaining in stock at the time of the exercise)

During the audit a traceability check was conducted for Intake received of Chocolate 823- Milk for DOI 15/11/22, -Qty received was 2.48 Tonnes. Product was sold between 15/11/22- 24/11/22.

The following process records were sighted:

- Print of reports from Intact – showing movements of product
- Sales order confirmation – Order No 31201283/33971- 14/11/22.
- PO 315804
- COA for Shipment -15/11/22
- Examples of Goods Out Ref 22314- 48 x 10 Kg
- Weekly Warehouse Cleaning Schedule & Record QM 6.4.5 ( Rev 5- 23/8/22)
- Freezer Temperature Checks QMS 156 (Rev 2- 17/10/22) – 67.1c, - 61.1c

The exercise was completed within 2 hrs.

There is a recall procedure QM 3.7 (Rev 6- 18/10/22) which details notification of all third parties including customers, regulatory authorities including certification body.

There are nominated responsibilities i.e., Managing Director is the recall co-ordinator, Technical Manager/ General Manager organises recovery, customers advised as required. Last recall test conducted on 12/2/23 in conjunction with the traceability exercise as above.

There is a business continuity procedure 3.8b (Rev 1- 28/10/22) and Incident Management 3.8a (Rev 1- 28/10/22) . The procedure includes all requirements of clause 3.8- Detail includes type of event that would constitute an 'incident' such as; disruption to key services, fire, malicious contamination. The incident team comprises the senior management team and Managing Director who is the coordinator. The business continuity procedure has a list of key contacts and there is a reference to alternative arrangements to fulfil customer expectations such as, supplying customer directly from Irish Bakels manufacturing sites. Out of hours contact details are included within the procedure.

There is a non-conforming product procedure for placing products on hold 3.9 (Rev 4-22/11/22) and GF Returns & rejections Policy QP 1.1.6 (Rev 2- 9/12/21). Any non-conforming products are identified with a HOLD sticker, details transferred to the CAPA log- excel based . There was product observed on Hold in the warehouse using a designated HOLD label applied. Products discarded as

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per approved waste contractors. Monthly reports of product returns / complaints/ quarantine/ disposed product completed at the end of every month.

Complaint's procedure in place, Ref: 3.10 (Rev 3- 19/12/22). Complaints are typically received by the Technical Manager , root cause analysis conducted, and an analysis of complaints conducted for trending. Examples reviewed showed that appropriate investigation had been carried out followed by corrective action where necessary.

Defined KPI included Reduce complaints year on year as % of orders.- for 2022 1.35% and 1.42% in 2021.

There are few complaints, there have been 2 complaints to date in 2023 and there were 25 complaints for 2022. A There are no trends with-regard to complaints. The site use and Excel log to capture complaints and included RC and outcomes – example reviewed 3/1/23- Forest Fruit Filling , nature of complaint burst bag , RC may be damaged in Transit, however the customer had the product for a few months, so transit company not contacted - CAPA- Continue to monitor all dispatched and photos are taken of all dispatched and was reviewed and no issues noted.

Complaints reviewed monthly and trended; no trends identified. Graphs are communicated to staff via notice boards, and this was noted during the site tour.

One non-conformances were raised in this section

Minor Nc No 2 Clause: 3.1.3 During the traceability test it was noted that the Goods out Record was not completed for on 22314 dispatched on 18/11/22

#### **N/A Clauses**

NII

#### **4. Site and Building Standards**

##### **Summary**

The site is situated on an industrial park and neighbouring activities include other warehousing and engineering companies who present no threat of product contamination. The grounds are well maintained with no planted areas close to the buildings. There is a clear area along the external of the warehouse. The grounds within the site are satisfactory, mainly of tarmac, and natural drainage is adequate. The industrial area is locked after 7pm and at weekends. There is CCTV operated by the industrial park but non site controlled or monitored. The site have a monitored alarm system in place.

The buildings are secured, having key-code. Visitors & contractors sign in. Contractors and visitors' book at reception, staff trained in security. All visitors must complete - Visitor & Contractors Questionnaire – Ref: 8.2.2 ( Rev 3- 16/1/23)

Procedure in place QM 4.2 (Rev 4- 16/1/23) and there is a documented Risk Assessment which was last completed – 25/8/22 and will be reviewed annually going forward.

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There is also a plan available of the layout of the site -Ref Map 4 and included Flows for people, product and waste- maps dated 24/1/23.

All materials are stored in individual designated locations and are fully protected in primary/secondary packaging materials. Allergen containing ingredients are segregated from non-allergen containing ingredients. There is a dedicated fork-lift truck battery charging area, that poses no risk to product and the area is well ventilated and all fork-lift trucks are battery operated.

Appropriate chemical storage as locked cage- There is only one chemical used in the warehouse ( in the floor scrubber) – MSDS sighted - FC-10 1/1/20.

Due to the nature of activities undertaken chemical cleaning is limited. Procedure in place- rev QM6.4 (Rev 6- 6/1/23) and includes schedule and Activity, frequency, tolls required and responsibility.

Vehicles are loaded and unloaded from one loading area and the pallets are fully protected against the elements during this process.

Walls are presented and maintained in clean condition. Warehouse floors are concrete, clean and undamaged. Ceilings are of a suitable construction and were maintained in a clean condition. There are only 5 operators in the warehouse. There is a high degree of ownership within the warehouse, and it is kept to a high level of fabrication and cleaning.

All water used on site is drawn from the main supply from Dublin County Council. Reports are available to download.

Lighting is satisfactory and aided by translucent roof panels. The lights are protected by glass panels they are positioned above the reach of the trucks. There is a monthly foreign body checklist, includes the warehouse ceiling lights, risk assessment in place. The lights are protected by glass panels they are positioned above the reach of the trucks.

There is a glass breakage procedure in place QM 7.4.1b (Rev 4- 10/1/23), staff trained in glass breakages. Glass breakage kits and completion of glass breakage report – red is the designated colour for glass breakage cleaning equipment and is also use do clean allergen spillage. There have been no recorded breakages.

The site conducts quarterly glass audits, this is also done on the APP and was previously paper based - report sighted for 24/1/23 with 96.49 % compliance with 2 issues noted – the following points were verified- Entrance x Clock , IE20- 5x Strip Lights

Container / bag burst procedure is include in Warehouse Spillage Procedure Ref: IQM7.4.2 (Rev 3- 12/1/23).

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The site also inspections (Hygiene/ Fabrication)- Quarterly as per scheduled an RA and site use an APP I Auditor – report sighted for 9/1/23 with a score of 85.9%. The site previously paper-based system (Rev 3- 9/11/21) egg report sighted dated 30/6/22 and Weekly Warehouse Cleaning Schedule & Record QM 6.4.5 ( Rev 5- 23/8/22)

As there are only few warehouse employees whose are long standing employees damage to the fabric is very minor.

Staff facilities are adequate for the number of staffs. Suitable and sufficient hand-washing facilities are provided in the toilets. There are no catering facilities on site; site provides a canteen area with kettle, microwave and toaster; refrigerator provided in the canteen for the storage of food brought to work by staff. Full time warehouse staff (5 in total) weare Hi Visibility and safety shoes. Visitors weare Hi Vis Jackets . There are never any products opened in the warehouse. There is one small changing room, and this was sighted to be well maintained during the inspection.

One non-conformances raised in this section of the standard.

Minor Nc No 3 Clause: 4.4.4-The site had not tested the water used for hand washing at the point of use

#### N/A Clauses

- 4.1.5 No external storage
- 4.3.4No extraction required
- 4.3.6 There is no tray or similar washing
- 4.4.5There are no building voids
- 4.5.1 No open foods are stored

### 5. Vehicle Operating Standards

The company do not operate any vehicles and all distribution is via third party hauliers

#### N/A Clauses

- 5.1- 5.4- The company do not operate vehicles

### 6. Facility Management

#### Summary

Equipment is maintained and serviced in accordance with maintenance schedule, Ref QM 61-6.3 (Rev 6- 23/1/23) annually (Forklifts). Chest Freezers are new from October 2022, but will be checked annually. The quantity of equipment on site is minimal. There is two pallet truck and two forklifts on-site. All handling equipment is electric. No diesel-powered Equipment used. There are Weekly checks as part of the cleaning checks Ref: Weekly Warehouse Cleaning Schedule & Record QM 6.4.5 ( Rev 5- 23/8/22)

Handling equipment (2x fork-lift trucks and two pump pallet truck) owned by the company, except one forklift which is leased . Maintenance records were available as per annual maintenance schedule, checked: Crown Forklift last done 27/1/23. Last racking maintained 13/10/22

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Fire extinguishers are checked on an annual basis last done October 2022. Wooden pallets are monitored at intake and during the quarterly inspections

Regular audits of building fabric are in place, conducted quarterly. Racking is checked on daily basis by the warehouse operatives. In addition, racking is inspected by a third party as required.

Warehouse staff use safety knives, which may be used to cut pallet wrap or strapping. Knives sighted were in good condition and used in manner that did not compromise product. Snap-off blade knives are not used.

Maintenance procedure and schedule in place, Ref: Ref QM 61-6.3 (Rev 6- 23/1/23)- Routine maintenance on-site is very limited due to the small quantity of equipment on-site. Third party contractors sign in at security prior to entering site, in addition there is a signed contractual arrangement in place with contractors. The changing of light bulbs is conducted out of hours by a contracted electrician. Service report reviewed for forklift service dated 27/1/23- serviced annually, as per maintenance schedule.

Calibration procedure Ref QM 61-6.3 (Rev 6- 23/1/23), no equipment used to monitor CCPS or product safety or legality – There is one temperature probe used on site to monitor temp of the chest freezers – and is calibrated – cert E27230 dated 6/10/22.

Procedure in place for housekeeping & hygiene, Ref: QM 6.4 (Rev 6- 6/1/23). Procedure included link responsibility and verification and include equipment and chemical to be used.

Cleaning chemicals are manually dosed by trained staff with the data sheets available for the chemicals used.

•MSDS sighted - FC-10 1/1/20

Cleaning schedules are in place for all areas. During the tour hygiene was seen to be to a good standard. Cleaning procedure for floor cleaning reviewed, Ref: IBSOP06 (Rev 2- 5/07/19).

Warehouse cleaned with broom and mop and bucket. Cleaning required is limited as only bagged products handled.

Weekly Warehouse Cleaning Schedule & Record QM 6.4.5 ( Rev 5- 23/8/22) and record also include monthly areas such as Mezzanine (Used for file storage), Walls/ racking – records sighted 28/1/23.

There is also Quarterly Housekeeping Hygiene audits

Waste procedure in place, Ref: IBQM 6.5 (Rev 4- 12/1/23). Very little waste is generated; mainly pallet wrap and kitchen rubbish. There was no accumulation of waste in the warehouse areas. Waste is streamed into different categories, plastic, cardboard, general waste. Adequate systems are in

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place for the collection, collation and disposal of waste material using a, licensed contractor: General waste – Panda waste – NWCPO-13-11193-06- Expires 20/1/25- dated 21/1/20. External covered skips and identified bins for recyclables. The site use capture kill boxes

Pest control procedure in place, Ref: QM6.6 (Rev 3- 8/3/22). The company employs BPCA registered pest control contractor No M15/700- Expiry 29/2/24. The service contract includes 12 routine inspections, and 4 EFK visits and 1 field biologists. Risk Assessment completed 6/5/22.

The contract covers rodents and flying insects. Up to date bait plans are in place and includes Internal/ External Bait Boxes, EFKs and Pheromone Trap: The following points were verified from the Map- 31/3/21:

- EFK1/2/- Warehouse
- External point 4/2/3
- Internal Point 10/17/3

Trend analysis is available in the pest control folder. Detailed records are kept of the pest inspections made and all recommendations actioned and signed off. All goods were appropriately stored on pallets and mainly on racking to facilitate pest inspection. Risk Assessment completed on 6/5/22. Last routine inspection 15/2/23 , 9/1/23 - No issues recorded. The Field Biologists study was undertaken on 6/5/22- 3 minor issues noted and closed out  
 No non-conformances raised in this section of the standard.

#### N/A Clauses

- 6.1.3 No diesel-powered equipment is used.
- 6.2.1 No temperature-controlled areas.
- 6.2.6 No open food products.
- 6.3.6 There is no equipment that is self-calibrating.
- 6.4.4 No CIP.
- 6.5.3 No products require specific conditions for disposal.
- 6.5.5 No surplus branded product handled, and no product passed to charities.
- 6.5.6 No customer branded products.
- 6.6.7 The site does not conduct its own pest management

### 7. Good Operating Practices

#### Summary

Materials are externally inspected on arrival for damage and correctness against specified standards and if any issues are noted the general manager or technical manager are informed . Frozen products are verified on arrival and any empties are noted and is included in SOP01. Residual shelf life is controlled through the Impact system. FIFO principles are used -SOP in place for the receipt of goods, SOP1 ( Rev 6- 6/1/23)

SOP 31 Goods Out Procedure (rev 2- 6/1/23) and dispatch of Frozen products SOP 3c (Rev 1- 3/10/22)

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Materials are stored in racking locations and are all fully wrapped in primary packaging materials at least. Palletised orders are assembled appropriate with reference to Storage SOP 2 (Rev 6- 3/10/22)

Pallets are pallet wrapped to ensure that all product is held securely. Pallets loaded onto the haulier's vehicles are strapped in place by the driver. There is a container/burst bag procedure in place Spillage Procedure Ref: IQM7.4.2 (Rev 3- 12/1/23) and issues are noted on the CAPA log, staff aware of procedure. No breakages YTD.

The site conducts quarterly glass audits, this is also done on the APP and was previously paper based - report sighted for 24/1/23 with 96.49 % compliance with 2 issues noted – the following points were verified- Entrance x Clock , IE20- 5x Strip Lights

Chemical handling included in QM 7.4.1 a (Rev 2 – 25/8/22) and chemicals are listed on the specific cleaning SOPs. Chemicals are limited to one and was observed to store in a locked cabinet in the warehouse.

Allergenic materials handling forms part of the HACCP; risk assessment for allergens notes storage and spillage controls. All products are packaged; allergen contamination assessed as low risk, allergenic products identified and stored appropriately. There are rows for allergen containing ingredient and rows of racking for non-allergen containing ingredients however there is no segregation of allergens within the allergen containing area. Gluten, Egg, Milk, Sulphites and Soya, Nuts. Staff trained in allergen handling for materials handled. Procedure QM 7.7 (Rev 3- 14/12/22)- Allergen Control and Allergen Policy QP 1.1.3 (Rev 4- 4/8/22) .All product on site is fully bagged, boxed the site do not open any items.

SOP 31 Goods Out Procedure (rev 2- 6/1/23) and dispatch of Frozen products SOP 3c (Rev 1- 3/10/22) -Products are picked on a strict rotation (FIFO) basis via a manual stock management system. Photos are taken of all product dispatched. Product release is controlled through FIFO basis via MRP stock management system.

No non-conformance raised in this section of the standard.

#### **N/A Clauses**

7.1.1There are no specific measurable conditions, such as temperature.

7.3.1 –7.3.8 No environmental control is required

7.6.2Product belongs to Irish Bakels

## **8. Personnel**

### **Summary**

There is a comprehensive training programme in place including a detailed induction and training, is reviewed appropriately annually. As per procedure QM8.1 (Rev 1- 16/1/23) and Pre Employment Medical Questionnaire Ref 8.1 a (Rev 1- 12/1/23)

Training is mainly conducted in-house with an external contractor providing training as required. (Forklift training)

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Holiday cover by colleagues via planning and overtime. No agency staff are used.

All members have had training on the below:

- Quality Policy and QM 8.2 -Personal Hygiene
- QM 8.1 – Training & Competency
- Medical Screening
- Site Security QM 4.2
- Pest Awareness – included in Site Standards manual Ref 8.1 ( Rev 1- 12/1/23)
- Allergen Awareness- QM 7.4.3
- Glass Controls – QM 7.4.1b

The site has 5 warehouse operative- The following records were reviewed:

- MS (Warehouse Operations Manager) - Site Standards Manual – 30/1/23, Medical 30/1/23 , Site Security- 30/1/23, Allergen management – 31/1/23 , Hygiene Policy 30/1/23
- SMK- (Warehouse Operative) - Site Standards Manual – 17/1/23, Site Security- 17/1/23, Allergen management – 31/1/23 , Hygiene Policy 17/1/23. Forklift Cert- 14/3/22

Staff competency is reviewed in the following ways: Interviewing of staff during internal audits and was last reviewed 9/2/23.

Refresher training is planned for every 3 years or sooner if there is a requirement or change in standard and or legal requirements.

The Food Safety & Hygiene Policy covers the requirements of this standard and all staff have received training on the food safety and hygiene rules. Personal hygiene procedure in place, Ref: IQM 8.2 (Rev 04 – 16/1/23) and included in the site standards manual Ref 8.1 (Rev 1- 12/1/23) Personal hygiene rules policy documented and was observed displayed on site. There is no loose jewellery allowed due to H&S concerns. All product is sealed.

There is an external area for smoking where a bin is provided however no company employees smoke. There is no external laundry.

One non-conformance raised in this section of the standard.

Minor Nc No 4 Clause: 8.2.1 During the site induction there was evidence of eating in the warehouse (Bar wrapper found in forklift), this contradicts the site personal hygiene policy

#### N/A Clauses

8.1.4 No CCP's

8.2.5- 8.2.8 No open food is handled.

#### 9. Handling of open food products

Not applicable

#### N/A Clauses

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### 10.1 Wholesaler Module

Procedure QM 10.0 (rev 1- 8/2/23)- Wholesale Module . Supplier approval based on GFSI, and the site complete all suppliers are rated as Low risk where GFSI certification is held. There is one supplier who does not hold GFSI, and the site have conducted a RA for JH , the RA includes Allergens, Biological, Chemical, Physical , Fraud & Adulteration / Malicious Contamination – the RA was last completed 23/1/23 with an overall rating as Low. Where supplier is GFSI certified, they do not have to complete a SAQ Ref QR02 (Rev 2- 17/5/18)

The following suppliers were reviewed.

- JH- Carmel – Rated as Low Risk- 23/1/23 and SAQ -21/9/22- Spec. Natural Thick Caramel Sauce- 25/4/22.
- BC- Chocolate Milk – Rates as Low Risk GFSI certified – FSSC Expiry 28/6/24- Spec -22/3/21.
- BC- Chocolate Rolls/ Decorations – Rated as Low Risk, GFSI certified – FSSC- Expiry 21/8/24- Spec – 2/2/22.
- Dried Fruit – Raisins – Rated as Low Risk, GFSI certified BRC Site Code 1352266- Expiry: 16/6/23- Spec 20/12/21.
- Skimmed Milk Powder – rated as Low Risk , GFSI certified BRC Site Code 1003829- Expiry 3/5/23 , Spec 25/6/21.

In order for a supplier to become an approved supplier a sample of the new material including specifications, (incl. allergen details) are requested Once ability is shown the new supplier must as a minimum provide a valid 3rd party certificate, or site RA , COA or COC and relevant specification to be included on the approved supplier list.

Approved supplier list in place, Ref: Spread Sheet – Dated Feb 23. The majority of suppliers are long standing suppliers, and all suppliers are rated Low risk.

The site has a documented Food Fraud & Vulnerability Assessment Ref: 3.5.3.1 dated 18/10/22) and was completed/ verified on 18/10/22- All suppliers/ services have been classified as low risk – This document is reviewed annually as part of the senior management review.

Procedure in place relating to customer contractual arrangements ref: QM 3.4 (Rev 3- 6/10/22) , customer specific requirements document, - the site has two CA one for OV and one for BC

This document each customer, and their specific requirements. such as BC if temp raises above 25c action is to be taken and OV require Frozen Storage- sighted for BC 10/1/22 and for OV various guidelines such as FAQ for Cultures- dated 2021

The majority of Products generally have no special handling requirements. However, if customers require special instruction this is noted in the customer agreement i.e., supply of C of A with each delivery.

Potential customer specific requirements which have been documented are:

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- COC or COA on delivery or as required
- RSPO Palm Products Only

Specific instruction are included in the Intact system (MRP System) – example sighted for Traced product Milk Choc to customer MF – Tail lift required as no forklift on site. This information is included on the delivery notes which are given to the warehouse team.

All Products belong to GF, except for products for OV (as described above), OV has agreed all handling requirements from the supplier as listed above. There is a documented system for purchasing and supplier approval, Ref: QM3.5 (Rev 2- 20/9/22) covers products and suppliers and services/ sub-contractors ( Hauliers)Ref 3.5.1 (Rev 3- 16/1/23)

The only claim is for RSPO of fats and the supplier of these materials holds the relevant certification- E.g.- Supplier R, who hold RSPO- 000233 Expiry 31/04/24 and site hold a licence as a distributor No 919251700000- Expiry 31/1/23

## N/A Clauses

All apply

## 10.2 Branded Products

Not applicable

## N/A Clauses

## 10.3 Other Wholesale Operations

Not applicable

## N/A Clauses

## 12. Ecommerce

Not applicable

## N/A Clauses

## 13. Contractual arrangements (all services)

Not applicable

## N/A Clauses

## 14. Product Inspection

Not applicable

## N/A Clauses

## 15. Contract Packing (Repacking, Assembly Packing)

Not applicable

## N/A Clauses

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**16. Quantity Control Inspections**

Not applicable

**N/A Clauses**

**17. Contract chilling/freezing/tempering/defrost and high-pressure process operations**

Not applicable

**N/A Clauses**

**18. Contact Cleaning of baskets, roll cages and other distribution containers**

Not applicable

**N/A Clauses**

**19. Waste recovery and recycling**

Not applicable

**N/A Clauses**

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