Audit Report

Global Standard Packaging Materials Issue 6: August 2019

1.Audit summary

Company name	FOSHAN MESTAEK PACKAGING LIMITED	BRCGS site code	10016322
Site name	FOSHAN MESTAEK PACKAGING LIMITED		
Scope of audit	Forming, packing of aluminum foil trays, aluminum foil roll,POP-Up foil sheet, disposable BBQ foil trays; Rewinding, packing of PE cling film, PVC cling film; forming, packing of baking paper, steam paper, cardboard box, air fryer paper.		
Scope exclusions	None		
Justification for exclusion	None		
Start date	2024-09-20	Finish date	2024-09-21
Re-audit due date	2024-09-20	Previous audit date	Select a date

Additional modules included

Modules	Result	Scope	Exclusions from Scope
Choose an item	Choose an item		
Choose an item	Choose an item		

2.Audit results

Audit result	Certificated	Audit Programme	Announced
Audit grade	A	Previous audit grade	Please select
Certificate issue date	Select a date	Certificate expiry date	Select a date

Number of non-conformities	Major against SOI of Fundamental	0
	Critical	0
	Major	0

2.Audit results

	Minor	10

3.Company details

Address	No. 22, XI'AN ROAD, Nanhai District, Foshan City		
Country	China	Telephone	+86 18022710697
Commercial representative Name	Wu Huoyu	Email	eleven@mestaek.com
Technical representative Name	Tao Yanbing	Email	3433285037@qq.com

4.Company profile

Plant size (square metres)	10-25K sq.m	No. of employees	1-50	No. HARA Plans	1-3
Subcontracted activities	No				
Outsourced processes	No				
Other certificates held	ISO9001				
Regions exported to	North America Asia Europe Choose an item. Choose an item.				
Major changes or auditor observations since last BRCGS audit	Initial BRCGS audit				

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4.Company profile

Company description	The company is established in 2015 and move to this new facility was in 2024, is a private-owned company, their products are aluminum foil trays, aluminum foil roll,POP-Up foil sheet, disposable BBQ foil trays; PE cling film, PVC cling film and baking paper, steam paper, cardboard box, air fryer paper, mainly exported to USA, Europe and Asia and also for domestic sale. Total production areas plus warehouses, were about 16,000 square meters including 3 production lines There are approx. 46 employees in the facility, running in one shift a day. (About 8:00~16:30). Main equipment includes forming machines, rewinding machines. There is no outsourced processing. The daily production capability is around 35 tons. There were not customer complaints about food safety and no products were recalled or withdrawn since 2023.

5.Product and process characteristics

Manufacturing Categories	02 - Papermaking 03 - Metal forming 05 - Flexible plastics Please select Please select Please select
Products in production at the time of the audit	aluminum foil trays 206*206*46 mm, PE cling film 30cm x200 M x9mic ; baking paper 50*57*40 mm.

6.Audit duration details

Total audit duration	12 hours	Duration of production facility inspection	6 hours
Reasons for deviation	None		
Next audit type selected	Announced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time

1	2024-09-20	09:00	18:00
2	2024-09-21	09:00	13:00

Auditor information		
Auditor number	Auditor Name	Role
22082	Johnsy Li	Lead Auditor
N/A		Please select

Present at audit
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings

Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Jiang Jinqiang/Plant Manager	onsite		onsite	onsite
Wu Huoyu/Vice General Manager	onsite		onsite	onsite
Li Huilan/QA Manager	onsite	onsite	onsite	onsite
Xu Yin/Trade	onsite	onsite	onsite	onsite
Tao Yanbing/Admin Manager	onsite		onsite	onsite
Jiang Xiaochun/Warehouse	onsite	onsite	onsite	onsite

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced
2024/09/20	BRCGS PM issue 6	announced

Document control				
CB Report number	BRC LLC 23042			
Template Name	P609 Packaging Materials Audit Report Template v11			
Standard Issue	6	*Template issue date*	2022-02-15	
Directory allocation	PackMat	*Version*	1.0	

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Non-Conformity Summary Sheet

Major non-conformity against statement of intent of a fundamental requirement				
No.	Clause	Detail	Critical or Major	Re-audit date

Critical			
No.	Clause	Detail	Re-audit date

Major							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	2.2.6	Hazard analysis worksheet for paper product is in place however potential product fraud is not considered for input of raw paper material.					
2	3.4.1	Specification of finished products paper product is in place however microbiological parameter like salmonella is not indicated					
3	3.7.2	Supplier audit report of raw paper supplier is in place but traceability and HARA review were not included.					
4	4.3.2	Compressed air is used but monitoring record in August 2024 is not provided.					
5	4.6.1	The aluminium foil to forming machine is very closed to floor when production line is stop and there is potential cross contamination.					
6	4.7.1	The cover of one lubricating machine is missing and					

		there is potential cross contamination even no any contamination observed onsite.					
7	4.7.5	Onsite found several spare part(bolts) are putting on windows in warehouse of raw material.					
8	4.11.4	One electronic flies killer #IG-13 did not work in warehouse.					
9	5.6.1	QC check record to indicate how many samples taken to be checked.					
10	5.6.5	Quality check record on 2024/08/26 for air fry paper 1.5g is in place but check result of mould type is not indicated.					

Comments on non-conformities
Click or tap here to enter text.

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Additional Modules/Head Office 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

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Detailed Section

1.	Senior management commitment
1.1	Senior management commitment and continual improvement

A quality/safety manual is in place, MSD-BRC-2023,A/0, updated on 2023-02-01.

The quality and safety policy have been signed by the company' general manager.

It establishes the company' commitment in the manufacture of safe products according to the relevant legislation, product safety, hygienic rules, and quality. It was reviewed and confirmed at the last management review meeting.

Product safety and quality culture plan was in place MSD-PF/BR-031, updated on 2023-02-01, including product safety culture theme training, staff communication meeting, staff questionnaire survey etc. latest measurement on 2024/04/01. The culture plan is effectively implemented.

Activities are implemented as per timescale and effectiveness was reviewed, such as staff communication meeting on 2024-04-01. The effectiveness of each activity is measured by summarizing and reviewing after the implementation, such as after the staff communication meeting, the minute was analyzed by senior management, and an activity plan was developed to update the followed questionnaires.

The quality and safety objectives include:

-Customer satisfactory ratio: no less than 90%

-Finished product inspection conformity: no less than 95%

-no food packaging safety incident

The objectives have been disassembled to each department with detailed objectives of each department, and communicated through meeting, e-mail, training course and board displayed in site entrance and workshop. And monitored per month, e.g. record from Jan to Dec 2024, results all meet the requirement.

Top management has provided human resource and financial resource to support BRCGS standard and maintained product safety and quality management system.

Channels of meetings, e-mail and board notice are implemented according to organization structure chart following employees, shift leaders, department managers, HACCP team and general manager.

The communication channel system includes those for customers and suppliers.

Quality department has been appointed to collect and keep relevant legislative requirements.

Example for:

GB 4806.1-2016 general requirements for food contact materials and food contact products.

GB4806.8-2016 general requirements for food contact paper and board and containers.

GB4806.9-2016 general requirements for food contact metal and containers.

GB 4806.7-2016 general requirements for food contact plastic material and containers.

GB/T 22865-2008 Kraft

QBT 1014-2010 food packaging paper

FDA 21CFR 176.170

EU 1935/2004

EU2023/2006

Current BRCGS packaging issue 6 was found on site.

Top management on site attend the opening meeting and closing meeting.

Initial BRCGS audit

1.2	Management review

A plan is in place to ensure the management review will be done at least once a year. Last management review was done on 2023-12-30. General Manager and department managers attend this meeting. Summaries of input included customer complaints, result of process monitoring, suppliers' performance, recall and withdrawal, objective and policy reviewed, communications, the performance of food safety management, internal audit results, 2nd party audit and 3rd party audit, any changes in the management system.

Summaries of output: suitability of food safety policy and food safety objectives, effectiveness of BRCGS system, resource requirements and continuous improvements. Improvement decisions were identified, such as strengthen management of supplier of mould making including implementing responsibility and timeframe.

Monthly meetings are conducted to enable product safety, legality, and quality issues to be brought to the attention of senior management and allows for the resolution of issues requiring immediate action. Examples for monthly meeting record of 2024-08-18.

1.3	Organisational structure, responsibilities, and management authority

The organization chart, covered in quality manual MSD-BRC-2023,A/0, updated on 2023-02-01, shows the site organizational structure, including the key staff deputies.

The job descriptions have been defined and some of them were assessed (e.g. HARA team Leader and production manager), they are shared with the employees in hard copy version.

The internal communications are based on local meetings (when necessary) and mobile phone communications.

Work instructions are available, communicated and in place for staff that responsible for every key activity

related to product safety, legality, and quality.

Deputization arrangement in place for key staffs, like general manager by production manager, production manager deputized by QA manager.

General Manager is responsible for implementing and managing BRCGS compliance.

Non-applicable clauses	1.1.7,1.1.9,1.1.10

2.	Hazard and risk management

2.1 Hazard and risk management team

One HARA plan was established based on HACCP principles and BRCGS packaging requirements.

(MSD-WI-HACCP-01, dated on 2024/07/20).

HACCP team was established, with 9 members. The team leader is Vice General manager, who was training about HACCP principles. The team leader is experienced, he worked in a food packaging company about 10 years.

The team members are QA Manager, purchase/warehouse controller, production manager, administration etc.

The multidisciplinary team is competent, experienced, and appropriately trained by tutor on 2024/4/25.

2.2 Hazard analysis and risk assessment

The HACCP study is implemented and the document MSD-WI-HACCP-01, dated on 2024/07/202 was assessed.

The product scopes have been clearly identified in their HACCP Plans, including aluminium tray,plastic cling film and paper product for food direct contact

Hazard analysis for all raw materials and all producing steps have been carried out and related control measures have been established and documented. The HACCP plan covers all related processing areas include storage areas for raw materials and finished products, processing areas and packaging areas.

Historical and known hazards have been identified and considered mainly through regular HACCP team meetings, professional training, information from publications and newspaper and official notice. Quality department has been appointed to pay close attention to relevant codes of practice or recognized.

Details of materials and finished products, including their intended use, are part of the technical documentation. e.g., description of aluminium tray,plastic cling film and paper product for use in restaurant

stores or home use.

raw materials: kraft paper,aluminium foil, plastic film,food grade oil.

safety index: heavy metal such as lead no more than 0.02mg/kg for aluminium tray; migration test ≤10（mg/dm2）for plastic cling film; for paper products, migration test ≤10(mg/dm2),methanal ≤1.0mg/dm2, salmonella is negative.

intend use: directly contact with food, no use of recycled materials.

No post-consumer recycled materials are in use and no recycling of internal materials.

Main processing steps: Forming, packing of aluminum foil trays, aluminum foil roll,POP-Up foil sheet, disposable BBQ foil trays; Rewinding, packing of PE cling film, PVC cling film; forming, packing of baking paper, steam paper, cardboard box, air fryer paper.

There is a documented flow diagram, verified by HACCP team least annually, latest on 2024-01-10 . It is accurate according to the audit tour, except NC raised below:

The hazard analysis considered the hazards of physical hazard (metal chips and other foreign bodies), chemical hazard (migrations, heavy metal) and microbiological hazard (mold, pathogens), foreseeable misuse by consumer, malicious intervention, raw material fraud etc.

Hazards and risk ratings determined based on likelihood (1-5) and severity (1-5).

Risk level of each hazard is defined as likelihood points times severity points, if one hazard risk level is higher than 16-25 points, that should be considered as CCP.

The HACCP team identified critical hazards: chemical contamination from raw materials (formaldehyde from paper, migration, and heavy metal from paper and plastic film and aluminium).

Other hazards are identified, such as hygiene control,foreign bodies which can be controlled by PRP and CP. Based on risk assessment and CCP decision tree, below CCPs were identified.

For aluminium products,Plastic cling film,paper products:

CCP1: Raw materials receiving (kraft papers/cling film/aluminium foil), COA of migration testing, monitored by QC each batch.

Critical limits were established according to legislation requirement (GB, FDA etc.) and trial, they are measurable. e.g.

CL1: for cling film, analysis result of Pb is no more than 1 mg/kg, total migration test no more than 10 ,g/dm2.

For kraft Paper: chloroform soluble extractive is no more than 0.5 mg/inch2 (e.g., n-heptane, 70F, 30 minutes)

CCP records were checked, e.g., reception record of cling film on 2024/8/16, COA of aluminium foil from ZT on 2024/03/29, kraft paper on 2024-01-03.

The monitoring system has been established for the CCPs, conducted by trained controllers.

The correction and corrective actions taken have been identified in CCP, e.g., for CCP1, reject the raw materials.

No deviations of CCP and CPs since 2023. No customers' complaints due to CCP/CP deviations since 2023.

The HACCP review including HACCP verification was done on 2024-8-15 by HACCP team considering the process changes, products intended use, returned goods, customers' complaints, food packaging alerts, potential products withdrawals etc.
2.2.6 Minor Hazard analysis worksheet for paper product is in place however potential product fraud is not considered for input of raw paper material.

Non-applicable clauses	Click or tap here to enter text.

3.	Product safety and quality management
3.1	Product safety and quality management system

Their product safety and quality management system has been established, documented, and implemented, based on BRCGS packaging requirements.

Main documents for the system include a safety/quality annual, control procedures for processes identified, HACCP system, work instructions and specifications. A quality management team/HARA team has been appointed to control the documents.

The copies of the documents have been distributed to each department and related Key staff could get the up-to-date versions.

BRCGS packaging standard requirements have been considered by the system. The system is reviewed at planning intervals, at least once every 3 years.

3.2	Document control

A document and record control procedure are in place to define how to control documents and records. MSD-PF/BR-008, A/0, updated on 2023-02-01.

The procedure details who will edit documents, who will approve documents, who will keep documents, how to update documents and how to store documents. Based on on-site checking, found that documents were approved by authorized person. A list is in place to indicate the latest version numbers for the documents. The reasons have been recorded for any changes to the documents.

Electronic documents and records are stored securely through authorized access and back-up.

All documents sampled during the audit were complying.

3.3	Record keeping

A document and record control procedure are in place to define how to control documents and records, including establishing, reviewing, collecting and storage. MSD-PF/BR-008, A/0, updated on 2023-02-01.

Quality department has been appointed as the centralized management department.

Legible and good justification records were observed from the reviewing of existing maintained records.

Records will be kept for long time (over 5 years) according to each kind product.

The electronic form is stored with authorized access, control of amendments and password protection, it is backed up to prevent loss.

3.4	Specifications

Specifications have been established for raw materials, semi-finished products and finished products.

The specifications of raw paper/aluminium foil/plastic cling film are in place with print version, SOP-JS-06-001 based on:
GB 4806.8-2016 general requirements for food contact paper and board and containers.
GB 9685-2016 additives for food contact materials and food contact products.
GB 4806.9-2016 general requirements for food contact metal and containers.
GB 4806.7-2016 general requirements for food contact plastic material and containers.
For finished products, related specifications:
1. FDA 176.170
2. GB4806.8-2016
3. GB4806.9-2016
4.GB 4806.7-2016
5.EU 1935/2006
Detailed information includes:
1. Sensory
2. Size
3. Migrations and heavy metals.

Raw and finished product specifications have been agreed with relevant parties, customers, or suppliers, through documented contracts.

The declarations of compliance or testing reports have been collected and kept from suppliers.

The declarations of finished products (burger paper bag) have been established and documented for related customers to show food grade products and for food contact. The declaration of compliance includes the nature of the materials, confirmation that materials meet relevant legal requirements, no post-consumer recycled materials, limitations, no allergens and use information, expire date etc.

The declarations are reviewed annually, latest on 2024-04-30.

Company also qualified each material to the third party to confirm to its conformity.
Trade marks will be reviewed with agreement signature by Sales and Customer.

Evidence shows that specifications had been regularly reviewed and updated according to relevant requirement. Review frequency is at least once every 3 years.
3.4.1 Minor Specification of finished products paper product is in place however microbiological parameter like salmonella is not indicated

3.5	Internal audits

An internal audit control procedure in place. MSD-PF/BR-040, A/0, updated on 2023-02-01.

An internal audit was done once per year based on risk assessment, e.g. on Dec 16, 2023 by 3 internal auditors, who have been trained BRCGS PM issue 6 training course including ISO19011 by external training provider in Oct 2023.

3 minor NCs were raised, corrective actions were established and implemented, e.g. part of products in warehouse are leaning on wall and the corrective action was verified on 2023-12-19 by internal auditor.

Internal audit reports include mainly:

1. Audit plan 2. audit checklist, in which conformities and non-conformities are all identified 3. Non-conforming CARs and related corrective actions.

A monthly on-site inspection plan is in place, carried out by a team from quality department, production department, maintenance, and warehouse keepers. Non-conforming items have been identified and documented based on on-site inspections. and action plans have been established, documented, and implemented. e.g., record on 2024-08-05 by administration manger, no NC raised.

3.6	Corrective and preventive action

The company has a documented procedure for the recording and investigation of non-conformances. REF: MSD-PF/BR-035, A/0, updated on 2023-02-01.

A documented record of the non-conformances includes description, assessment of consequences by a competent and authorized person, cause, immediate action, corrective action, responsible staff, and deadlines for implementation. The corrective actions checked during the audit were adequately verified.

Example: internal audit NC: part of products in warehouse are leaning on wall and the corrective action was

verified on 2023-12-19 by internal auditor.

, root cause analysis and preventive action: training and inspection, record on 2023-12-19.

3.7	Supplier approval and performance monitoring

A purchasing control procedure is in place for approval and monitoring of all suppliers.MSD-PF/BR-017,A/0, updated on 2023-02-01.

A list of approval suppliers is in place, which is updated regularly according to supplier assessment results, latest updated on 2024-03-03.

The frequency of supplier´s evaluation is at least once a year including performance of quality, deliver time, price, serve and complaints. Suppliers provided relevant licenses and COAs, also provided with questionnaire of business normally.

There is a documented risk assessment for each type of raw materials and primary packaging, updated on 2024-08-03. Assessment is based on the hygiene and quality risk to the product and legal requirement.

Suppliers of raw kraft paper are considered as high-risk level and must be approved based on supplier audit e.g. raw paper supplier GZJC was audited on 2024-02-05.

For low-risk supplier: The questionnaires for supplier approval are carried out at least on 3-year frequency. E g. carton supplier (FSML) on 2024-03-03.

The audit and questionnaires include GMP, HARA review, traceability system and product safety.

The evaluation frequency of supplier is at least once a year including performance of quality, deliver time, price, serve and complaints. Suppliers provided relevant licenses and COAs, also provided with questionnaire of business normally.

There is a documented process for the ongoing review and monitoring of suppliers, based on risk, and using defined performance criteria. Questionnaires are reissued at least every 3 years. Records of the review are kept.

3.7.6 n/a. No materials purchased from agents or brokers.

The detailed exception was defined in procedure, no exception happened till now. The procedure has defined how exceptions are handled; for example, the use of products or services where an audit or monitoring has not been undertaken. Assessment (on a batch) take the form of certificate of analysis and statement of compliance.

3.7.2 Minor Supplier audit report of raw paper supplier is in place but traceability and HARA review were not included.

3.8	Product authenticity, claims and chain of custody

Documented vulnerability assessment of risk is carried out for all raw materials and risk level is low.

The plan is reviewed at least annually, latest on 2024-04-01.

The site has processes in place to access to the information on historical and developing threats to the supply chain which may present a risk of substitution of the used raw materials, like from trade association, governmental sources, and public websites.

3.8.3 not applicable.

3.9	Management of subcontracted activities and outsourced processes

No outsourced processing.

3.10	Management of suppliers of services

The evaluation of supplier of services is performed according to the supplier control procedure for service. There are contracts with services suppliers to define clear expectation.

The suppliers of devices calibration, waste service, transportation service and lab service have been evaluated and approved annually, and contracts between are available, e.g., contract signed with Shenzhen Huijiatong logistic in 2024.

3.11	Traceability

A traceability control procedure is in place. MSD-PF/BR-023, A/0, updated on 2023-02-01.

A team is in place for traceability controls.

They record all batch number of raw material and packaging material during acceptance by reception date. Semi-product's batch number are defined by processing date and order number.

Final product's batch number is defined by packaging date and order number.

The batch numbers of raw material, packaging material, semi-products and final products are recorded (on paper) and onsite labeled during all processes.

Traceability records are kept by their quality department, which are retrievable according to on-site test by auditor. See below:

The on-site traceability test by auditor started form finished Products: air fryer paper 1.5g,

Batch number of finished product: 240830

Results:

Production date: 2024-08-26

The batch number of raw paper: 240730

The batch number of primary packaging: 00738.

Time spent: 2.0 hours

Mass balance: effective, such as raw paper, purchased quantity 80000 pieces, used quantity 79800, disposed + quantity in stock is 200.

Related production records: incoming raw material checking records, forming records, checking records, product testing records and shipping records.

Obvious identification on packaging with detailed batch number to identify each batch product.

A plan is in place to test their traceability system regularly. The mass balance considers the amount (%) of material used in the product formulation; the production yields (material lost at the beginning and end of the production runs, scraps).

Mock traceability was done by the company on 2024-01-16:

From aluminium tray with batch number MSD233279 trace to aluminium foil (lot number1300371) ,food grade oil with lot number 1300368,PE bag 1300373 and vice versa (from aluminium foil trace to aluminium tray)

The test was completed within 4.0 hours including mass balance and the result was accurate.

All traceability records to raw materials (including packaging materials) and to customers has been maintained, e.g.raw material receiving, forming, checking, packing and despatch.

Rework operation record kept for traceability.

3.12	Complaint handling

A procedure is in place for customer communication and contract review procedure.

There are 2 customer complaints since last audit in 2023 due to deviation of size and structure of aluminium tray.

Corrective actions are established and implemented based on a root cause assessment.

3.13	Management of product withdrawals, and incidents and product recalls

The processes are managed according to the document product recall procedure MSD-PF/BR-033, A/0, dated on 2023-02-01 and the document risk management that defines how emergencies, strikes, serious

injuries and fatality shall be managed. MSD-PF/BR-013.

The risk analysis is based on the potential cause of failure, its severity, the risks quotation, control measures, the recommended actions to be addressed and the company' personnel involved.

The events to be managed as incidents are the raw materials chemical, physical and microbiological contamination.

The multidisciplinary team members are in charge the management of incidents and products withdrawals.

The withdrawal test is performed on annual basis and the last one mock withdrawal date: 2024-04-20.

Assumed reason: deviation of size for aluminium tray.

Products need be withdrawn: aluminium trays with batch number JY2023121906.

Quantity: 3000 cases

Time: 2.0 hours

Result: effective

The timing of key activities was recorded, including incidents discovery time, internal communication and withdrawal deciding time (in 60 minutes), shipment and stock investigation, client's communication time (in 60 minutes).

The effectiveness of the test was reviewed, and no improvement needed yet.

N/A 3.13.6 No real product recall

Non-applicable clauses	3.7.6 No materials purchased from agents or brokers. 3.9 No outsourced process 3.13.6 No real product recall

4.	Site Standards
4.1	External standards

The boundary of factory is clearly defined and there was no pollution around factory. During on-site audit, found that the exteriors were in clean and tidy conditions. Building fabric is maintained very well to minimize potential pest entry, ingress of water and other contamination. All ground within the site were covered with cement or grass, in an appropriate condition. A clean and unobstructed area was provided along the external walls of the building.

The company is in the industry zone, surrounding roads.

Canteen located in factory but segregated from production and storage area.

4.1.5 N/A due to no external storage of raw materials.

4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas

During on-site audit, found that buildings were suitable to produce packaging products.

The fabrication of the site, buildings and facilities are suitable for its products process. Walls were constructed of painting. Floors were surfaced with terrazzo and epoxy resin. Ceilings were constructed of plasterboard.

The building of facility for the product was in well maintained and in good conditions. The fabrication of the site, buildings and facilities are suitable for its products process. The building fabric is maintained to minimize potential for product contamination. Site boundaries are clearly defined and maintained condition in order to prevent potential contamination of product.

No potential contamination observed during assessment. Adequate drainage is observed.

The windows were in the closed manner during audit on-site inspection.

Glass windows are shielded to prevent breakage.

The lights for lighting in the workshop have been well protected.

Ventilation was adequate. Dust extractors were provided.

4.3	Utilities

The potable water is supplied by the municipality and use only hand washing.

Water is not used for the production process.

The compressed air is used in direct contact with aluminium products and which is monitored monthly,e.g. on 2024/5/10.

No gases and ice are in use.

No risk of product contamination was observed.

4.3.2 Minor Compressed air is used but monitoring record in August 2024 is not provided.

4.4	Site security and product defence

The risk assessment of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage is a part of the security control procedure MSD-FM-PD-15.

A team is in place for security controls.

The site is completely fenced, the personal badge is necessary to enter the building.

Last review of product security system was on 2024-03-01.

Visitors and contractors entering the site working areas are registered.

Drivers cannot enter the facilities.

Visitors and contractors shall be always accompanied and supervised by staff members. Monthly security inspection reports in place.

The personnel were trained about the food defense and site security.

There are no external storage tanks.

4.5	Layout, product flow and segregation

The process flows, travel routes (for personnel, raw materials, semi-finished products, and final products), staff facilities (changing room, hand-washing facilities, personal items storage facilities), routes for the removal of waste, process flows, and storage areas were defined and showed in the map of the site, which was verified by HARA team.

The premises, layout, housekeeping, and maintenance activities are satisfactory conducted and appropriate to the products manufactured.

They have one workshop respectively for paper products.

The processing workshop has 1 floor and segregated to 4 main areas: raw material inspection and storage area, processing area (printing, bag making), and packaging area, warehouse of finished products.

The equipment is arranged according to the process flow.

There is effective segregation in place to minimize the risk of product contamination, the plan of the site which designates areas where product is at different levels of risk from contamination is defined in PRP.

The process flow from intake to dispatch is arranged well to minimize the risk of product contamination.

Unpacking area for raw materials is designated, no contamination risk for production.

There was sufficient working space and storage space to enable all operations to be carried out properly under safe hygienic conditions.

The raw materials in use are appropriately stored. Reworks are carried out inside the production area.

The changing rooms are located inside the building.

Contractors and visitors including drivers are made aware of the site hygiene rules.

Designated walkways are identified and marked on the floor, to minimize the risk of production. The routes are simple and logical.

4.6	Equipment

The machines in use are specific for the products manufactured: forming machines, compressing machines.

The machines are appropriately managed, maintained and cleaned to minimize any risk of product contamination.

No wooden equipment/tools are used, 4.6.3 NA

Notices on equipment are cleanable and secure.

The newly installed equipment was properly specified before purchase and were tested before used.

The maintenance and cleaning plan were updated for new equipment and implemented.

4.6.1 Minor The aluminium foil to forming machine is very closed to floor when production line is stop and there is potential cross contamination.

4.7	Maintenance

A preventive maintenance program is in place, all paperwork, covering all items of the equipment and buildings within the specified intervals of daily by operators, weekly, monthly, and yearly by maintenance. Planed on 2024-1-20.

Daily inspection of the equipment is conducted by operator and in-house engineers are in place for maintenance management.

No major breakdowns in last 12 months.

Maintenance site is protected well to prevent contamination risk to product when maintenance activities happened. Maintenance tools and parts are counted before and after maintenance, hygiene is performed after maintenance, the maintenance record is signed by production and QC and it shows that the production and clearance have been performed.

A procedure is in place for temporary repairs/modifications to ensure product safety. Only in case of emergencies, tape, cardboard, and other temporary measures can be used. No temporary repairs observed during on-site audit. Engineering workshop is sited outside of production workshops.

The food grade lubricant H1 NSF certified is used based on risk assessment.

The preventive maintenance interventions (mechanical and electric) are planned and performed monthly and on half-year basis. The maintenance staff is in charge the cleanings at the end of the maintenance interventions before the production resuming. e.g. record on 2024-08-30 for forming machine.

The maintenance is undertaken by internal engineers, if contractors are needed, their activities will be monitored by designated Engineering workshops are maintained in good condition, to prevent contamination from the workshops.

4.7.1 Minor The cover of one lubricating machine is missing and there is potential cross contamination even no any contamination observed onsite.

4.7.5 Minor Onsite found several spare part(bolts) are putting on windows in warehouse of raw material.

4.8	Housekeeping and cleaning

Housekeeping and cleaning procedure in place MSD-PF/BR-049 dated on 2023-02-01.

the equipment, tools, the surface of the contract food used products and walls in the cleaning manner. Training records are in place for cleaning team.

The systems are performed by internal employees who are trained at least annually. Training plan was established at the start of every year, training was conducted at meeting room at first then on-site operation training.

Housekeeping and hygiene systems defined cleaning objects, cleaning methods, frequency, responsibilities, and safety requirements. Cleaning objectives include tools, equipment, product contacting surface, buildings, and environment.

Verification of the cleaning and disinfection by visually check is demonstrated: daily cleaning visually check by QC, e.g.record on 2024-07-15, at least monthly reviewing against rotating schedule.

The trend analysis is performed after inspection. The facility would identify improvement point from result of verification if non-conformity happened. The trend map was kept on file.

Cleaning chemical including alcohol is provided with MSDS and label /instruction. The company doesn't have strongly scented chemical in place. Cleaning chemicals for toilets are segregated from other equipment during on-site audit.

Microbiological environmental monitoring program is doing once per year based on risk for paper product line, latest analysis report in place??.

4.9	Product contamination control
4.9.1	Glass, brittle plastics, ceramics, and similar materials control

Glass and brittle material control procedure is in place. MSD-PF/BR-063

There is no presence of unnecessary, non-production glass, ceramics, or brittle plastic which may cause pose product contamination.

The procedures are for handling glass, brittle or hard plastic, ceramic or other materials include the requirements to inspect.

The list of the glass and brittle material is available, showing locations, numbers, and conditions. A plan is in place to ensure the conditions of glass, brittle or hard plastic based on the list. The inspection records are seen and specify the responsible persons as well as the result and the date.

Example for checking record on 2024-08-02. Checking frequency is at least once every week.

Instructions about cleaning or replacing glass items or brittle materials and segregating contaminated products have been provided: MSD-PF/BR-063.

4.9.2	Sharps and metal control

A sharp material control procedure is in place.MSD-PF/BR-043, A/0,2023-02-01.

There are no staples used in workshop and storage area. No ingredients and packaging which use staples or other foreign-body hazards as part of the packaging material. It is defined clearly in workshop management rule.

There is a documented policy for the control of the use of sharp metal in place. Knives/sharp objects such as scissors were used in workshop to open packaging of ingredient, are registered and checked before start-up and at the edge of stopping, e.g., record on 2024-08-02. Product will be segregated and evaluated once breakage happened.

4.9.3	Chemical and biological control

Documented chemical control procedure with a reference is in place.

Main chemicals include lubricant and disinfectant(alcohol). A list is in place to show the approved chemicals.

MSDS are in place for all chemicals. MSDS and food grade testing report of lubricant and disinfectant were reviewed. A room is in place for chemical products, such as lubricant and disinfectant. A room is in place for other chemicals, such as cleaning chemicals, during on-site audit, found that all chemical products were controlled, without risks of product contaminants.

HACCP principles are used to identify and control the microbe hazard and potential allergen contamination.

4.10	Waste and waste disposal

The organization suitably runs a system to collect and dispose of all kind of waste. MSD-PF/BR-060

A suitable number of waste containers are located outside the building.

No waste and scraps were observed during the site tour other than those stored into the containers.

The waste is collected by the local municipality.

Production scraps are sold to be recycled.

Substandard trademarked materials are rendered unusable through destructive process, and third-party specialist provided record of destruction.

4.11	Pest management

The pest monitoring system is operating inside and outside the premises. A pest control procedure is in place.

The pest control is implemented by external qualified service provider SINGBO, contract valid till 2025/04/30.

The monitoring interventions is once per month, performed on quarterly basis to monitor presence/traces of rodents, flying insects and crawling insects.

Internal and external traps, glue boards, EFKs are provided to control of rats and flies and crawling insects. No toxic bait was used.

The company dealt the thresholds of interventions.

The monitoring reports dated 2024-06-04 were assessed. Catch analysis report in place in 2024.

The process is performed according to the documented SOP.

Employees understand the signs of pest activity and be aware of the need to report any evidence to a designated manager.

No observed any activity of pests during the audit. No infestation since the last audit.

4.11.4 Minor One electronic flies killer #IG-13 did not work in warehouse.

Non-applicable clauses	4.1.4 There is no natural external drainage. 4.1.5 No external storage of raw materials. 4.4.3 There is no external storage tanks or silos.

	4.6.3 No wooden equipment/tools are used. 4.7.6 Temporary repairs were not found at the time of the audit. 4.9.2.4 There is no open noticeboards

5.	Product and process control
5.1	Product development

A documented product design and development procedure is in place to ensure product safety, quality, and legality. MSD-PF/BR-048, A/0, dated on 2023/02/01. The main steps include customers' requirement identification, product design, product trails, product testing and customer approval.

For new products, customers' requirements have been identified, documented, and agreed. Product trails have been carried out and related trail records and testing reports were in place to show safety, legality, and quality. Product formulation has been established.

All changes have been formally approved by the risk management team members, and it is checked, the reports for new products were in place.

Recycled materials are not used.

5.2	Graphic design and artwork control

A procedure is in place for graphic design and artwork controls. MSD-PF/BR-048, A/0, dated on 2023/02/01.

All artwork files were provided by the customers.

No print process.

The formal acceptance and approval of final product concepts and artworks by the specifier were in place, it was validated that the agreed product quality and safety standards at start up and regularly.

The agreed product quality and safety standards at start up and regularly are validated e.g.aluminium foil tray 206*206*46 mm verified by customer and QC on 2024-03-16.

The site has a documented procedure for managing changes to artwork to manage obsolete artwork.

Customer-approved reference materials, including masters and color standards, were stored, and segregated/controlled well.

Artwork files and approved masters are in electronic form and these are suitably protected to prevent loss or malicious intervention.

5.3	Packaging print control

No print process
N/A

5.4	Process control

The facility has identified manufacturing process control points that could affect the quality (e.g. gluing defect) of the products produced, including printing, bag making etc. Processing specifications have been established and documented for the control points.

Critical manufacturing process. Controls:

Forming of air fryer paper product temperature and time(240C,18seconds)

Process checking records were performed and related checking records were in place, e.g., process inspection record on 2024-08-02.

Documented machine settings and process limits for quality are documented and inspected by operators, such as temperature and time of forming machine, e.g., record on 2024-08-02.

Operating procedures were implemented and monitored. A control procedure is in place for changes to product composition, processing methods or equipment. The facility will re-establish process characteristics and validate product data with special report once changes happen.

Change over from aluminium tray368*229*413 mm to size 77*46*22mm was observed during audit, clearance is implemented by operators and checked before start-up of followed production.

5.5	Calibration and control of measuring and monitoring devices

A calibration control procedure is in place for the testing and measuring devices, covering:

- a list of measuring and monitoring devices

- checking frequency

- checking methods

- trained staff to carry out the checks when the device shall be internal calibrated

The company has defined a plan for the verification-calibration of all measuring devices. The frequencies established are adequate, internal per day and external annual. Updated on 2024-04-01.

Main devices include rulers, scales, micrometers. Outside calibration records sampled:

E.g., ruler calibration certificate with no 14129262 dated on 2024/05/10,micrometer calibration certificates on 2024-05-10 with cert number FCC8240367336, scale calibration dated on 2024-05-10 with no MSD001 etc.

Records of the calibration of all critical equipment are available. Equipment has been calibrated to a

traceable and recognized standard (GB standard).

During on-site audit, found that related operators were aware of the procedures to be undertaken.

5.6	Product inspection, testing and measuring

A plan is in place for product inspection, testing and measuring, covering on-line inspections, internal laboratory tests and outer contractor tests.SOP-JS-06-003

For example:

Incoming raw paper main testing items include:

1.sensory assessment

2. Size

3. Strength

4. COA

e.g., record on 2024-08-20.

Main testing items of finished products:

-Size, foreign bodies, quality defects, sensory assessment and test frequency is each batch.e.g.record on 2024-08-26 for aluminium tray. record on 2024-09-01 for PE cling film. record on 2024-09-01 for air fry paper 1.5g.

external third-party accredited contracting lab tests:

- by Foshan quality supervision and testing center laboratory(accredited no CNASL1401). e.g., migration test, Pb, As and testing report on 2024/05/20 for aluminium tray and analysis report for air frier paper, all result are satisfactory.

-calibration of equipment at least once a year.

-methods need to be accredited and approved, GB methods were taken.

-all lab tester has been trained

N/A 5.6.9 There is no automatic inspection system.

5.6.1 Minor QC check record to indicate how many samples taken to be checked.

5.6.5 Minor Quality check record on 2024/08/26 for air fry paper 1.5g is in place but check result of mould type is not indicated.

5.7	Control of non-conforming product

A non-conforming product control procedure is defined and implemented. BRC-TB-CX-024, A/0, updated on 2023-01-02.

Clear process well understood by staffs that are interviewed during the audit. Special container in special area for non-conforming products were provided and stored separately.

For incoming material: rejection in time, responsibility is QC receiver;

For semi-finished product: production operator must isolate and label non-conforming product, QC responsible for assess and evaluation; stored in appointed areas.

For finished product: test finished products and isolate/evaluate the non-conformity, QC responsible for evaluation and handling and making a loss, stored in appointed areas.

e.g., record about paper bags on 2024-02-15 due to printing deviation, 110 bags, disposed.

QC is responsible for assessing and evaluation; stored in appointed areas.

Procedure defines how to handle and conduct potential trend analysis.

The statistic of non-conformity product was conducted by QA, any potential trend was performed in corrective action report based on each quality levels such as deviation of printing, gluing etc.

The potential trends were reviewed in monthly management meeting and corrective action will be followed in next circle.

5.8	Incoming goods

A receiving control procedure is in place.

Purchase order/ deliver sheet, COA, label and packing condition is checked at first according to receiving standard, then material sampling to check appearance, size and testing in lab based on receiving standard, material will be rejected if non-conformity happened. Raw material and packaging material inspection and test procedure is established and implemented. e.g. reception record:

For raw material kraft paper on 2024-08-30; For aluminium foil on 2024-08-26 and PE cling film on 2023-9-05.

Including sampling information and loads inspection.

The received materials were verified by authorized person such as QC prior receiving. Materials then are

stored in incoming materials warehouse and labeled and used by FIFO rule.

COAs of kraft paper, cling film,aluminium foil from suppliers are provided. e.g. for kraft paper, COA on 2024-01-03 from supplier GFJC; For raw cling film 450mm×500m×0.008mm, COA dated on 2024-01-16. for raw aluminium foil, COA on 2024-03-29 from supplier HNZT.for PET container from supplier,COA dated on 2024/5/10.

A receiving control procedure is in place.

Sensory assessment, heavy metal, migrations, strength testing reports from third parties were reviewed.
No incoming goods defect for rejection since last BRCGS audit, according to the statistical data from IQC.

5.9	Storage of all materials and intermediate and finished products

During on-site audit, found that all materials were separately stored and clearly identified. The materials were stored on the pallets and away from floor. The stock rotation is based on FIFO rule.

Chemicals are handled in such a way that risk to product safety, quality and legality is minimized.

Storage is controlled well to protect the product from contamination, including taint or odor and malicious intervention. Pallets are appropriately protected and inspected for signs of damage and contamination before use.

N/A 5.9.8 No material intended for recycling.

5.10	Dispatch and transport

A document transportation control procedure is in place.

During the audit, found that the loading areas were clean, in good conditions for transportation requirements.

The warehouse keepers will inspect the container before loading. The inspection items: cleanness, pest activity and dilapidation, e.g., record on 2024-05-02. The container is not passed until inspection results are good.

Raw material and packaging transport arranged by suppliers.

Finished products are shipped with the third-party logistics company.

All facilities used for the transportation of product, movement around the site, and dispatch of finished product are suitable for the purpose, maintained in good repair and in a hygienic condition. E.g., forklift checked on site.

The site warehouse/logistic responsible visually inspects the trucks before the finished products.

Records of the checks are reported on the form.

Non-applicable clauses	5.3 no printing process 5.6.9 There is no automatic inspection system. 5.9.8 No material intended for recycling. 5.10.6 No third part contractors for dispatch and transport.

6.	Personnel
6.1	Training and competence: raw materials handling, preparation, processing, packing and storage areas

Training records for all personnel, including visitors and contractors are in place.

A training plan is in place for all employees, including those in product quality controls, product safety controls, CCP/HACCP, GMP, specifications and other BRCGS packaging requirements. Planed on 2024-01-01.

Training methods include meeting room courses and on-site training. For CCP training, each CP/ CCP point was trained at first in meeting course with questionnaire and then on-site operation training. Training results were assessed based on paper examinations and on-site performance.

Induction trainings were planned to new employees prior to work, including information related to products safety, quality, legality, but no new employees recently.

Evaluation for staff is conducted through site operation, examination, or discussion.

Employee can’t conduct work if training is not passed.

Examples for training record:

CCP/CP monitoring staffs: on 2024-3-24

Cleaning staffs: 2024-02-28

Product defense: 2024-1-30

product testing:2024-3-30.

The training records include signature of trainees, date and duration, training provider, title and material, the effectiveness of training.

During on site audit operators (e.g., a bagmaking machine cleaning operator and a printing machine operator) were interviewed, who can demonstrate their competence.

6.2	Personal hygiene: raw materials handling, preparation, processing, packing and storage areas

The site has established the personal hygiene standards and behaviors.

The implementation of personal hygiene policy is good.

Designated lockers are provided for storing personal items, such as cell phones and cups etc., in changing room. Personal items are not allowed to bring into production areas

The hygiene and behavior rules established are applied by the personnel operating in the production halls. The relevant document is “Good personnel hygiene policy” (MSD-PF/BR-051).

Accesses to production areas have hand-washing facilities which include water in sufficient quantity and at a suitable temperature, liquid soap, 75% alcohol sanitizers, located air driers for hands, water taps with hand-free operation, advisory signs to prompt hand-washing, and air shower.

Compliance is checked daily by supervision and by daily Hygiene/GMP audits e.g., record on 2024-09-07.

Storage of personal medicines in production and storage areas is not allowed, personal items and personal belongings are stored in personal lockers.

All cuts and grazes on exposed skin are covered by a colored plaster.

Where visitors cannot comply with site hygiene rules, they will not be allowed entering production area.

6.3	Staff facilities

Changing facilities were provided which were well appointed, ensured changing prior to entry and allowed direct access to production, packing and storage areas. No segregated walkways.

The dressing rooms, the break room and the other social areas are wide enough, suitable equipped and kept in satisfactory cleaning conditions.

Washing facilities and dispensers of sanitizer are located at the entering of the production halls.

Smoking is just allowed outside the building, within defined areas.

Drinking is allowed in designated area.

No food is allowed to bring into processing, storage area.

No risk of products contamination was observed.

6.4	Medical screening

All the employees operating in the production areas are aware of their responsibilities concerning their health conditions. All staffs including temporary staffs have been trained about infections, diseases or conditions in which they may have been in contact or be suffering from.

The company' doctor visits all the employees as per the relevant legal requirements, once per year.

Health certificates were in place for Mr.LI on 2024-07-06 etc.

Blue plasters in use.

During the evaluation, auditor was asked to complete a health questionnaire.

6.5	Protective clothing

Each employee has at least 2 work uniforms including caps or hairnets and coats according to different hygiene-sensitive.

Completed protective clothing is put on before entering workshop, also for visitors and contractors.

Protective clothing is changed in changing room before to toilet and use of canteen and smoking areas outside workshop.

Protective clothing is cleaned by staff at home and visually checked by QC daily, e.g., record on 2024-07-07. During on-site audit, found that protective clothing was in clean conditions.

Laundering SOP was developed and trained to all staffs including laundering processes, laundering chemical, concentration requirement and segregation of clean and dirty clothing. Marked Ziplock bags are provided to transport protective clothing from home to workplace.

No risk of products contamination was observed, and protective clothing is suitable.

Non-applicable clauses	6.5.10 there is no disposable protective clothing.

Requirements for traded products	
7.1	Approval and performance monitoring of manufacturers/packers of traded packaging products
Not applicable	
7.2	Specifications
Not applicable	
7.3	Product inspection and laboratory testing
Not applicable	

7.4	Product legality
Not applicable	
7.5	Traceability
Not applicable	
Non-applicable clauses	Not applicable

Additional Module: Plastic Pellet Loss Prevention	
10.1.1	Senior management commitment and control improvement
Click or tap here to enter text.	
10.2.2	Hazard analysis and risk assessment
Click or tap here to enter text.	
10.3.5	Internal audits
Click or tap here to enter text.	
10.3.6	Corrective and preventive action
Click or tap here to enter text.	
10.3.13	Management of incidents
Click or tap here to enter text.	
10.4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas
Click or tap here to enter text.	
10.4.4	Site security
Click or tap here to enter text.	
10.4.5	Layout
Click or tap here to enter text.	
10.4.8	Housekeeping and cleaning
Click or tap here to enter text.	
10.4.10	Waste and waste disposal
Click or tap here to enter text.	
10.5.8	Incoming goods
Click or tap here to enter text.	

10.6.1	Personnel: training and competence
Click or tap here to enter text.	
Non-applicable clauses	Click or tap here to enter text.