**BRCGS SELF-ASSESSMENT TOOL**

**Welcome to the BRCGS Self-Assessment tool**

We hope that you will find this useful when preparing your site for an audit against the BRCGS Standard for Storage and Distribution Issue 3.

**How to use the BRCGS Self-Assessment tool?**

This tool is designed to help you assess your operation against the requirements of the Standard and help prepare you for your certification audit.

The checklist covers each of the requirements of the Standard and may be used to check your site’s compliance with each of these requirements. The checklist also allows you to add comments or identify areas of improvement in the empty boxes provided at the end of each section.

While we hope that this tool is useful in helping you prepare for your audit it should not be considered as evidence of an internal audit and will not be accepted by auditors during an audit.

**Training**

The BRCGS Training Academy has courses available to improve the understanding of the requirements for the BRCGS Standard for Storage and Distribution issue 3 and may be useful for the person using the BRCGS Self-Assessment Tool. For further information on the courses available please visit [brcgs.com/training/](https://www.brcgs.com/training/)

**Further Information**

If you have any further questions about the BRCGS Self-Assessment Tool or the BRCGS Standard for Storage and Distribution Issue 3 please do not hesitate to contact the BRCGS team

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| **Clause** | **Requirements** | **Y/N** |
| **1. Senior management commitment** |
| **1.1 Senior management commitment and continual improvement** |
| **Statement of Intent** | **The company’s senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Global Standard for Storage and Distribution. This shall include provision of adequate resources, effective communication, systems of review and actions taken to identify and effect opportunities for improvement.** |  |
| 1.1.1 | The company’s senior management shall develop and document a quality policy statement which states the company’s intentions for the safe and legal storage and/or distribution of products and its responsibility to its customers. This statement shall be:* authorised
* reviewed
* signed and dated by an appropriate senior manager
* communicated throughout the company.
 |  |
| 1.1.2 |  | The company’s senior management shall provide the human and financial resources required to implement the requirements of this Standard and effect improvements identified through management review processes. |  |
| 1.1.3 | The company’s senior management shall ensure that objectives are established for the storage and/or distribution of products to maintain product safety, quality and legality in accordance with the quality policy and this Standard. The objectives shall be documented, measurable, monitored, reviewed and clearly communicated to each operating location. |  |
| 1.1.4 | Management review meetings attended by the company’s or site’s senior management shall be carried out at least annually to ensure that the stated objectives are being met and are appropriate. Management review shall cover all relevant locations, be documented and include an evaluation of:* previous management review minutes, corrective action plans and timeframes
* results of internal, customer and independent external audits, customer performance indicators, complaints and feedback
* incidents, product rejections/returns, wastage and resultant corrective and preventive action plans
* feedback from reviews of the hazard and risk analysis system
* resource requirements.
 |  |
| 1.1.5 | The management review meeting decisions and actions agreed shall be effectively communicated to appropriate staff and the actions implemented within the agreed timescales. Records should be updated to show when actions have been completed. |  |
| 1.1.6 | There shall be clear communication and reporting channels to senior management for staff responsible for monitoring compliance with the Standard. This shall include suggestions for improvement. |  |
| 1.1.7 | The company shall have a current, original hard copy or electronic version of the Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website. |  |
| 1.1.8 |  | The most senior operations manager on site shall attend the opening and closing meetings of the audit for the Global Standard for Storage and Distribution. Where central management systems are operated for multi-site operations, a manager with responsibility for the management system shall be available during audits of hub and satellite operations. |  |
| 1.1.9X | Where required by legislation, the company and operating locations shall be registered with (or approved by) the appropriate authority, and evidence of this shall be available. |  |
| 1.1.10 | Where the site is certificated to the Standard, it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate. |  |
| 1.1.11 |  | The site’s senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence. |  |
| Comments |
| **1.2 Organisational structure, responsibility and management authority** |
| **Statement of Intent** | **The company shall have an organisational structure that clearly ensures the definition and documentation of the job functions, responsibilities and reporting relationships of staff whose activities affect product safety, legality and quality.** |  |
| 1.2.1 | The company shall have an up-to-date organisational chart demonstrating the management structure of the company.This shall, where appropriate, include the responsibilities for any associated hub or satellite depots and any responsibilities carried out by a head office. |  |
| 1.2.2 | The senior management of the company shall ensure that all employees are aware of their responsibilities and that mechanisms are in place to monitor the effectiveness of their operation. |  |
| 1.2.3 |  | The senior management of the company shall ensure that levels of responsibility and accountability are clearly defined for key staff involved with product safety, legality and quality systems. To this end, job descriptions shall be available. There shall be appropriate documented arrangements in place to cover for the absence of key staff. |  |
| 1.2.4 | The senior management of the company shall have a system in place to ensure that it is kept informed of all relevant legislation, product safety issues, scientific and technical developments, and industry codes of practice. There shall be a system in place to ensure that relevant information is passed to the management at other locations, where appropriate. |  |
| Comments |
| **2 Hazard and risk analysis** |
| **Statement of Intent** | **The site’s product safety plan shall be based on the principles of hazard and risk analysis, which shall be documented, systematic, comprehensive, fully implemented and maintained. In the food industry these principles are commonly known as HACCP (hazard analysis and critical control points).** |  |
| 2.1 |  | Prior to the company conducting a hazard analysis, the company shall ensure prerequisites are in place. Product safety prerequisites or handling requirements shall include, but not be limited to:* condition and maintenance of buildings, equipment and transport vehicles as appropriate
* documented practices for the safe handling, storage and transport of products
* procedures for handling damages, waste product and returns
* pest control procedures
* sanitation procedures (cleaning and disinfection)
* maintenance of the cold chain (not applicable to ambient stable products)
* personal hygiene (limited applicability to pre-packed food products or consumer products)
* training.
 |  |
| 2.2 | The hazard and risk analysis shall be carried out by a multi-disciplinary team including operators and managers who are experienced in the particular activities undertaken by the site. The team members shall have knowledge of the hazard and risk analysis principles. |  |
| 2.3 | The person responsible for leading the hazard analysis shall be able to demonstrate competence in the understanding of HACCP principles and their application. In the event of the company not having appropriate in-house knowledge, external expertise may be sought but the day-to-day management of the system shall remain the responsibility of the company. |  |
| 2.4 | X | Where the hazard and risk analysis study has been undertaken centrally, it shall be possible to demonstrate that the study has been verified to meet the specific activities of the local operation to which the study applies. |  |
| 2.5 | The hazard analysis, and resulting procedures, shall have senior management commitment, and shall be implemented through the site’s documented management systems. |  |
| 2.6 |  | The company shall define the scope of the hazard and risk analysis in terms of the products and processes that are covered.This shall include:* a description of the types of products stored or distributed and any particular specified storage or handling conditions; for example, temperature control, fragility, maximum stacking height, propensity to water damage, conditions of light
* the product flow from receipt, storage and dispatch transport to the recipient of the product. This shall include any cross-docking or intermediate storage steps which may be used in the distribution and any back-haul or returns activities.
 |  |
| 2.7 | The company shall identify and record all potential hazards associated with each step of the product flow as identified in clause 2.6. The company shall include consideration of the following types of hazard:* microbiological growth resulting from temperature abuse of products that require temperature control
* physical contamination (e.g. glass contamination from broken lights, wood splinters from pallets, dust, splashing during transfer, pests)
* chemical contamination (e.g. product tainting, spillage, cleaning chemicals)
* physical damage (e.g. breakage, puncturing of packaging, water damage)
* allergenic materials (e.g. cross-contamination of loose product or outer packaging by allergenic products).
 |  |
| 2.8 | The company shall complete a documented analysis of the potential hazards in order to identify which need to be controlled. The following should be considered:* the likely occurrence of the hazard, as established by previous company/industry experience
* the severity of the hazard (e.g. injurious to health, potential to cause food-poisoning, rejection or a product recall)
* existing prerequisite programmes that effectively prevent or reduce the hazard to acceptable limits.
 |  |
| 2.9 |  | For each hazard which requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by the use of a decision tree. Critical control points are defined as those control points which are critical to prevent, eliminate or reduce a significant hazard to acceptable limits. |  |
| 2.10 |  | **Control by prerequisites and documentation**Where the control of hazards is by means of prerequisite programmes, these shall be fully implemented and be demonstrably effective in controlling or reducing the hazard. |  |
| 2.11 | X | **Critical control points**If there are critical control points (CCPs) that are identified where product safety and legality requires control measures to be in place, e.g. storage temperature, then for each CCP it is necessary to:* establish critical limits
* establish a system to monitor control of the CCPs
* establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control
* establish procedures of validation and verification to confirm that the system is working effectively, including auditing of the system
* establish documentation concerning all procedures and records appropriate to these principles and their application.
 |  |
| 2.12 | The hazard and risk analysis shall be reviewed whenever new product types that have different characteristics from the products included within the original study are stored or transported, or where new operations/process steps are introduced. |  |
| 2.13 | The hazard and risk analysis and prerequisite programmes shall also be formally reviewed at least annually and this review documented. |  |
| Comments |
| **3 Quality management system** |
| **3.1 General documentation requirements** |
| **3.1.1 Quality systems** |
| **Statement of Intent** | **The company shall document procedures to demonstrate compliance with the Standard and shall ensure that all documents necessary to demonstrate the effective operation and control of the processes underpinning this compliance are in place.** |  |
| **3.1.2 Documentation control** |
| **Statement of Intent** | **The company’s senior management shall ensure that all documents, records and data critical to the management of product safety, legality and quality are in place and effectively controlled.** |  |
| 3.1.2.1 | All documents in use shall be authorised and be the correct version. |  |
| 3.1.2.2 |  | Documents shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate personnel. They shall be readily accessible to relevant staff at all times. |  |
| 3.1.2.3 | There shall be a record of the reason for any changes or amendments to documents critical to product safety, legality or quality systems and procedures. |  |
| 3.1.2.4 |  | Changes to documents shall be effectively notified to document users. A procedure shall be in place to ensure obsolete documentation is rescinded and, if appropriate, replaced with a revised version. |  |
| Comments |
| **3.1.3 Record completion and maintenance** |
| **Statement of Intent** | **The company shall maintain records to demonstrate the effective control of product safety, legality and quality.** |  |
| 3.1.3.1 | The records shall be legible and genuine, and retained in good condition for an appropriate defined time period. The record retention time period should reflect product shelf life and any specific customer or legal requirements, but shall never be less than 1 year. |  |
| 3.1.3.2 | The company shall operate procedures for the collation, maintenance, storage and retrieval of all relevant records. Where records are in electronic form, these shall be suitably backed up to prevent loss. |  |
| Comments |
| **3.2 Internal audit** |
| **Statement of Intent** | **The company shall audit those systems and procedures that are critical to product safety, legality and quality to ensure they are appropriate and complied with.** |  |
| 3.2.1 | The audits shall be scheduled, and their scope and frequency shall be established in relation to the risks associated with the activity. The audits shall cover all of the locations included within the scope. |  |
| 3.2.2 | Internal audits shall be carried out by appropriately trained, competent auditors, who shall not audit their own work or where they have direct influence on the operation within the department or section being audited. |  |
| 3.2.3 | Records of internal audits shall be maintained to ensure that conformity as well as non-conformity can be clearly identified and verified. |  |
| 3.2.4 | Results of the internal audit and positive and negative comments shall be brought to the attention of the personnel responsible for the activity audited. Corrective actions and timescales for their implementation shall be agreed. |  |
| Comments |
| **3.3 Corrective and preventive action** |
| **Statement of Intent** | **The company’s senior management shall ensure that procedures exist to record, investigate, analyse and correct the cause of failure to meet standards, specifications and procedures which are critical to product safety, legality and quality.** |  |
| 3.3.1 | An appropriate staff member shall be identified and allocated the responsibility and accountability for each corrective action. This shall be documented. |  |
| 3.3.2 | The company shall ensure that effective actions are taken to correct each non-conformity and shall monitor and record their completion within an appropriate timescale. |  |
| 3.3.3 | Where a non-conformity places the safety, legality or quality of products at risk, this shall be investigated and recorded including:* clear documentation of the non-conformity
* assessment of the consequences by a suitably competent and authorised person
* the action to be taken to address the immediate issue
* an appropriate timescale for correction
* the person responsible for correction
* verification that the correction has been implemented and is effective
* identification of the root cause of the non-conformity and implementation of any necessary actions to prevent recurrence.
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| Comments |
| **3.4 Customer contractual arrangements** |
| **Statement of Intent** | **The company’s senior management shall ensure that processes are in place to determine their customers’ needs and expectations, clearly define their requirements and ensure that these requirements are fulfilled.** |  |
| 3.4.1 | Customer requirements for the storage and/or distribution of their product shall have been agreed with the customer and documented prior to fulfilment. This shall include any specific handling requirements for the products, e.g. temperature, humidity, light conditions, stack height or compatibility requirements. This may be in the form of a company-issued service specification where no customer-issued specification exists. |  |
| 3.4.2 | The company shall have the ability to meet defined customer requirements without compromising product quality, safety and legality. |  |
| 3.4.3 | Where specified by the customer a review of customer needs and requirements shall be undertaken. Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate personnel. |  |
| 3.4.4 |  | There shall be key performance indicators established relating to customer requirements, performance shall be measured and results communicated to relevant staff. |  |
| Comments |
| **3.5 Purchasing** |
| **Statement of Intent** | **The company shall control all its purchasing processes that are critical to product safety, legality and quality to ensure that services procured conform to defined requirements.** |  |
| **3.5.1 Supplier approval and performance monitoring of service providers and equipment suppliers** |
| 3.5.1.1 | There shall be a documented procedure for the approval and monitoring of suppliers of services and equipment. Such services, as appropriate, shall include (but not be limited to):* pest control
* laundry services
* contracted cleaning (both storage and vehicles)
* contracted servicing and maintenance of equipment
* equipment providers (e.g. of racking, pallets).
 |  |
| 3.5.1.2 | Specifications or contracts shall exist between the company and the supplier to define the service provided. |  |
| 3.5.1.3 | The performance of the supplier shall be monitored and action taken where services fail to meet requirements. |  |
| Comments |
| **3.5.2 Management of subcontractors** |
| **Statement of Intent** | **Where activities covered by the scope of this Standard are subcontracted to a third party, e.g. distribution, the subcontractor shall be required to work in accordance with the relevant requirements of this Standard and relevant legislation.** |  |
| 3.5.2.1X | A contract or written agreement shall exist with all subcontractors, which shall, on the basis of risk and any specified customer contracts, define requirements for the safe handling, storage and transport of products, e.g. temperature, special handling requirements, segregation of incompatible products, vehicle type. |  |
| 3.5.2.2X | There shall be a documented process for the review and acceptance of a subcontractor who could potentially impact product safety quality and legality. This process shall include a review of the subcontractor’s ability to meet the specified requirements for the safe storage or distribution of products. This may include certification against the Standard. |  |
| 3.5.2.3X | There shall be a documented review of the performance of all subcontractors and necessary follow-up action to ensure the safety of products where performance is not to specification. |  |
| 3.5.2.4 | X | A register of suitable approved subcontractors shall be maintained, which shall include subcontractors required irregularly, e.g. to meet peak seasonal demand, breakdown cover. |  |
| Comments |
| **3.5.3 Product authenticity** |
| 3.5.3 | The company shall undertake a documented product and service fraud vulnerability assessment of the potential risks of adulteration or substitution to products. The output from this assessment shall be a documented vulnerability assessment plan. Where products are identified as being at risk, this plan shall include details of the appropriate assurance and/or processes implemented to mitigate the identified risks. The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risk. It shall be formally reviewed on an annual basis. |  |
| Comments |
| **3.6 Traceability** |
| **Statement of Intent** | **The site shall have a system of traceability with the ability to trace products through receipt, storage, dispatch and, where applicable, distribution, and vice versa.** |  |
| 3.6.1 |  | The site shall have adequate procedures to ensure products and/or pallets are labelled and/or coded to allow product identification and traceability at all times. |  |
| 3.6.2 | Inventory records for vehicles shall enable products to be tracked from loading to delivery and include tracking the movement of trailers/vehicles. |  |
| 3.6.3 | Procedures shall ensure traceability of damaged packs and of products returned to stock or disposal. |  |
| 3.6.4 | The system shall be tested at least annually to ensure that traceability can be determined, including consignor details, through the warehouse/store and/or distribution to the final consignee. Full traceability should be achievable in 4 hours. |  |
| Comments |
| **3.7 Management of product withdrawal and product recall** |
| **Statement of Intent** | **The company shall have effective documented procedures to facilitate product withdrawals and product recalls.** |  |
| 3.7.1 | The company shall ensure that systems are in place to formally notify the owner/manufacturer of products where evidence of a product quality or safety issue becomes apparent during the storage or distribution of their product. Documented evidence of the formal notification must be retained. |  |
| 3.7.2 | The procedures relating to product withdrawal and product recall shall be appropriate, formalised and capable of being operated at any time, and will take into account stock requisition, logistics, recovery, storage and disposal (see Requirements, section 3.9 Control of non-conforming product, damages and returns). The procedures shall be regularly reviewed and, if necessary, revised to ensure that they are current. |  |
| 3.7.3 | The product recall and withdrawal procedures shall be tested at least annually to ensure their effective operation. All records supporting the recall data and results of the test shall be retained. |  |
| Comments |
| **3.8 Incident management and business continuity** |
| **Statement of Intent** | **The company shall have procedures in place to identify and effectively manage incidents including contingency planning to enable business continuity in the case of major incidents which may affect the operation.** |  |
| 3.8.1 | The company shall provide written guidance to relevant staff regarding the type of event that would constitute an ‘incident’, and a documented incident-reporting procedure shall be in place. |  |
| 3.8.2 | Procedures shall exist to ensure that product put at risk by an incident is held pending further investigation. |  |
| 3.8.3 | The owner of the product shall be informed where an incident occurs that may put the safety or quality of their product at risk. |  |
| 3.8.4 | The company shall develop contingency planning for business continuity in the event of major incidents such as:* disruption to key services – e.g. water, energy, staff availability
* events such as flood, fire and natural disaster
* malicious contamination or sabotage.
 |  |
| 3.8.5 | The procedures shall include as a minimum:* identification of key staff constituting the incident management team and their responsibilities
* an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. deputies, emergency services, suppliers, customers, certification body, regulatory authority)
* alternative arrangements to fulfil customer expectations
* a communication plan, including the provision of information in a timely manner to customers, consumers and, where appropriate, regulatory authorities.
 |  |
| Comments |
| **3.9 Control of non-conforming product, damages and returns** |
| **Statement of Intent** | **The site shall have documented procedures to ensure all non-conforming product is clearly identifiable, effectively quarantined to prevent release and issues investigated.** |  |
| 3.9.1 | Where products are held pending further investigation, this shall be carried out in such a way as to minimise any further deterioration of these products or contamination of other products. |  |
| 3.9.2 |  | All non-conforming products shall be handled or disposed of according to the nature of the problem and/or the specific requirements of the owner. |  |
| 3.9.3 | Corrective actions shall be implemented where appropriate to prevent recurrence of non-conformance, and adequate documentation kept of the action taken. |  |
| 3.9.4 | The site shall have a defined policy for customer returns and rejections. |  |
| 3.9.5X | Where returns are accepted, procedures shall define, on the basis of risk, the disposition of returned stock – i.e. disposal, return to good stock or collection by the product owner. Records shall be retained. |  |
| Comments |
| **3.10 Complaints handling** |
| **Statement of Intent** | **The company shall have a system for the management of complaints and complaint investigation regarding products and/or services provided.** |  |
| 3.10.1 | Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively, and records shall be retained. |  |
| 3.10.2 | Complaint data shall, where appropriate, be used to instigate ongoing improvements in order to prevent recurrence. |  |
| 3.10.3 | A system shall be in place to notify the product manufacturer/supplier or owner of complaints about their products where the cause of the complaint does not relate to the activities of the site. |  |
| Comments |
| **4 Site and building standards** |
| **4.1 Location, perimeter and grounds** |
| **Statement of Intent** | **The site shall be located and maintained so as to provide protection and prevent hazard to products. Safety, legality and quality of products shall not be compromised.** |  |
| 4.1.1XR | Consideration shall be given to local activities and environment, which may have a potentially adverse impact, and measures shall be taken to prevent product contamination. Where measures have been put into place to protect the site from any potential contaminants, these shall be regularly reviewed to ensure they continue to be effective. |  |
| 4.1.2 | All grounds within the site shall be finished and maintained to an appropriate standard. |  |
| 4.1.3 | A clean and unobstructed area shall be in place along external walls of buildings used for the storage of products. |  |
| 4.1.4 | Sites shall be adequately drained. Where natural drainage is inadequate, additional drainage shall be installed. |  |
| 4.1.5X | External storage shall be minimised where undertaken, and items shall be protected from contamination and deterioration. |  |
| Comments |
| **4.2 Site security** |
| **Statement of Intent** | **The site security shall ensure product safety and integrity.** |  |
| 4.2.1 | A documented risk assessment shall be undertaken to identify potential risks to the security of product held on the premises in storage or on vehicles, and appropriate controls implemented to reduce the risk. The risk assessment should be reviewed at an appropriate frequency or, as a minimum, annually. |  |
| 4.2.2XD | Access to the site by employees, contractors and visitors shall be controlled and a visitor reporting system shall be in place. |  |
| 4.2.3 |  | The company shall have documented site security procedures. Staff shall be trained in the site security procedures and encouraged to question or report unidentified or unknown visitors. |  |
| Comments |
| **4.3 Layout, product flow and segregation – product intake, handling, storage and dispatch areas** |
| **Statement of Intent** | **The design and layout of the premises shall provide a working environment that prevents the risk of product damage and facilitates product safety, legality and quality.** |  |
| 4.3.1XD | Premises shall allow sufficient working space to enable all operations to be carried out properly under safe hygienic conditions and prevent the risk of product damage. |  |
| 4.3.2 | Adequate segregated storage facilities shall be available to enable incompatible products to be effectively segregated, where required, to minimise the risk of taint or cross-contamination. |  |
| 4.3.3XD | The positioning of machinery, equipment, site facilities and services, where provided, shall not jeopardise the integrity of the product, and shall prevent product contamination and damage. |  |
| 4.3.4XD | Suitable and sufficient extraction methods shall be provided in areas where fumes may build up (e.g. battery-charging areas). These areas shall also be segregated from product storage areas. |  |
| 4.3.5 | Appropriate storage facilities shall be provided for the control and storage of cleaning and maintenance chemicals, and sited so they shall not compromise the safety, legality and quality of the product. |  |
| 4.3.6X | Cleaning facilities, e.g. for tray-washing, shall, where appropriate, be adequately segregated from product handling and storage. |  |
| 4.3.7 | Where products are susceptible to weather damage, vehicles shall be loaded and unloaded in covered bays so as to protect the product, or other effective measures shall be put in place. |  |
| Comments |
| **4.4 Fabrication – product intake, handling, storage and dispatch areas** |
| **Statement of Intent** | **Construction and maintenance of product handling and storage facilities shall be commensurate with the activities being undertaken by the site and shall not have a detrimental effect on product.** |  |
| 4.4.1XD | Walls, floors, ceilings and pipe work shall be maintained in good condition and shall be capable of being kept clean. |  |
| 4.4.2XD | Floors shall be designed to meet the demands of the operation and, where appropriate, withstand cleaning materials and methods. They shall be impervious and maintained in good repair. |  |
| 4.4.3XD | Where there is a need for drainage, it shall be designed and maintained to minimise risk of product damage or contamination and not compromise product safety, quality and legality. |  |
| 4.4.4XD | All water supplies used for cleaning, or in connection with any operation in the storage of products, shall be potable, either being drawn from mains supply or suitably treated according to its source. |  |
| 4.4.5XD | Building voids shall be accessible for inspection and, where appropriate, cleaning. |  |
| 4.4.6X | Adequate lighting shall be provided for all work areas. Suitable and sufficient lighting shall be provided so as to permit effective inspection of product and effective cleaning. |  |
| 4.4.7XD | All bulbs and strip lights that are vulnerable to breakage, including those on electric fly killer units, shall be protected by shatterproof plastic diffusers, sleeve covers or a shatterproof protective coating. Where full protection cannot be provided, the glass-management system shall take this into account. |  |
| 4.4.8XD | Where there is a risk of contamination from glass from window breakage, glass windows shall be protected against breakage or the product shall be adequately protected. |  |
| 4.4.9XD | Buildings shall be suitably proofed against the entry of all pests. This shall include as appropriate:* the screening of windows that are designed to be open for ventilation
* the provision of external doors that are close-fitting or adequately proofed
* where external doors to storage areas are kept open, the adoption of suitable precautions to prevent pest ingress
* the fitting of screens and traps to drains to prevent pest entry
* the protection of canopies from bird roosting and nesting.
 |  |
| 4.4.10XD | The condition of the building fabric shall be monitored through documented audits. Repairs and improvements identified shall be scheduled. |  |
| Comments |
| **4.5 Staff facilities** |
| **Statement of Intent** | **Staff facilities shall be sufficient to accommodate the required number of personnel, designed and operated to minimise the risk of product contamination. Such facilities shall be maintained in good and clean condition and meet any applicable legal requirements.** |  |
| 4.5.1 | Where open food is stored, toilets shall not open directly into storage areas. All toilets shall be provided with hand-washing facilities comprising:* basins with soap and water at a suitable temperature
* adequate hand-drying facilities
* hand-wash signs.
 |  |
| 4.5.2 | Suitable and sufficient hand-cleaning facilities shall be provided and easily accessible to staff and, where applicable, vehicle drivers. Such hand-wash facilities may be located within toilet areas. |  |
| 4.5.3X | Where protective clothing is required, designated changing facilities shall be provided for all personnel, whether staff, visitors or contractors, with direct access to handling and storage areas. |  |
| 4.5.4XD | Facilities shall be provided for the safe storage of personal items so that such items are not taken into storage areas. |  |
| 4.5.5X | The position of catering facilities, where provided, shall not jeopardise the safety, legality and quality of the product. |  |
| Comments |
| **5 Vehicle operating standards** |
| **5.1 Vehicle standards** |
| **Statement of Intent** | **All vehicles used for the transportation of product shall be suitable for the purpose, maintained in good repair and in hygienic condition.** |  |
| 5.1.1XS | The load-carrying area shall be free from loose items, damaged panels or projections which could present a risk of damage to products. |  |
| 5.1.2XS | The load-carrying area shall be maintained in a suitable condition to prevent the ingress of rain or dampness during transport where the product is vulnerable to weather damage. |  |
| 5.1.3XS | The load-carrying area shall be maintained in a condition which facilitates ease of cleaning. |  |
| 5.1.4XS | The load-carrying area shall be inspected prior to loading to ensure it is fit for purpose. This shall ensure that it is (as a minimum):* in a clean condition
* free from strong odours which may cause taint to products
* free from excess humidity which may cause growth of moulds.

Records of inspections shall be retained. |  |
| 5.1.5XS | Load supports, lashing points, load lock strips and fastenings shall be maintained in good condition and adequate in number to allow loads to be stabilised effectively during transport. Fastenings for curtain-sided vehicles shall be in good condition and secure. |  |
| 5.1.6XS | Rear door shutters and tail lifts where fitted shall be in good working order. |  |
| 5.1.7X | Where vehicles are equipped with transfer hoses and pumps for the loading or unloading of tankers, these shall be in good condition, hoses capped and securely contained during transport. Any associated product filters shall be maintained in good condition. |  |
| 5.1.8X | Where bulk tankers are used for transporting food or other vulnerable products, records of the vehicle load history and cleaning interventions shall be maintained and available to customers as required. |  |
| Comments |
| **5.2 Vehicle and load security** |
| **Statement of Intent** | **Procedures shall be in place to ensure product/load is held under secure conditions during transport and, where appropriate, during loading and unloading to prevent theft or malicious contamination.** |  |
| 5.2.1XS | A documented risk assessment shall be undertaken to identify potential risks to the security of the load during transportation, at cross-docking and when using drop-offs. Appropriate controls shall be implemented to reduce the risks. The risk assessment should be reviewed at an appropriate frequency or, as a minimum, annually. |  |
| 5.2.2XS | Access to all vehicles shall be restricted to authorised personnel. |  |
| 5.2.3 | XS | Procedures for maintaining the security of the vehicle shall be documented and shall be understood by drivers and delivery staff. |  |
| 5.2.4XS | Where vehicle load areas are fully enclosed, doors shall be locked when vehicles have been loaded. Where seals are used, these shall be checked for integrity before unloading. |  |
| 5.2.5XS | Where locks or seals are not fitted to vehicles, alternative security arrangements shall be employed, in accordance with risk, together with inspection procedures. The system shall be sufficient to ensure that if access to the load-carrying area of the vehicle has occurred, this would be evident and action taken to ensure the safety of the products. |  |
| Comments |
| **5.3 Vehicle management** |
| **Statement of Intent** | **The management of vehicles shall be organised to ensure that legal requirements are met and there is minimal risk of disruption to the service provided.** |  |
| 5.3.1XS | Procedures shall be in place to ensure that road vehicles are maintained in a roadworthy condition to reduce the risk of vehicle breakdown and consequent failure to meet customer requirements. |  |
| 5.3.2X | Where legally required, vehicle operators shall be registered with the appropriate authority. |  |
| 5.3.3XS | Procedures shall be in place in case of vehicle breakdown, accident or incident. The procedures shall ensure that product quality, safety and legality are maintained and should include:* clear instructions and emergency contact numbers for the drivers
* instructions on how to preserve any specific temperature or other environmental controls appropriate to the load
* checks required to be made on the load before continuing the journey.
 |  |
| Comments |
| **5.4 Vehicle temperature controls** |
| **Statement of Intent** | **Where environment control of product (e.g. temperature or controlled atmosphere) is critical to product safety, legality and quality, the operating limits shall be clearly specified, adequately controlled, monitored and recorded.** |  |
| 5.4.1 | X | The company shall operate procedures to verify that the vehicle and equipment employed are capable of consistently maintaining specified product temperature requirements at maximum and minimum loads. |  |
| 5.4.2 | X | Automatic temperature and time-recording equipment shall be used to monitor and record the temperature of the load-carrying area to ensure that the product temperature remains within specification. In the absence of such equipment, manual checks shall be carried out and recorded at an appropriate frequency. |  |
| 5.4.3X | Where settings can be adjusted, measures shall be in place to verify temperature settings of vehicles prior to dispatch. Vehicles transporting chilled and frozen products shall be chilled before loading or the required air temperature achieved within a defined time of loading commensurate with maintaining the specified product temperature. |  |
| 5.4.4X | Loading and unloading operations shall be undertaken in such a way as to maintain product temperature within the specified limits. |  |
| 5.4.5 | X | A system shall be in place to enable the driver to be made aware if the temperature of the load-holding area varies from the specified limits. |  |
| 5.4.6X | In the case of equipment failure, procedures shall be in place to establish the safety and quality status of the product, prior to release to the customer. |  |
| Comments |
| **6 Facility management** |
| **6.1 Equipment** |
| **Statement of Intent** | **Equipment shall be suitably designed for the intended purpose and shall be used so as to minimise the risk of damage to, or contamination of, product.** |  |
| 6.1.1XD | Roll cages, pallet lifts and forklift trucks shall be maintained in a good working condition to prevent damage to product. |  |
| 6.1.2 | XD | If racking is present, it shall be adequately maintained, constructed and periodically inspected for damage. |  |
| 6.1.3XD | All diesel-powered handling equipment, where used, shall incorporate an appropriate exhaust filter system for the removal of particulates that can pose a contamination risk to product. |  |
| 6.1.4 | XD | Where appropriate, procedures shall be in place to monitor the condition of wooden pallets and plastic trays to prevent the risk of contamination or damage to products. |  |
| 6.1.5 | Knives or other tools provided shall be used in such a way as to prevent damage to products. Snap-off blade knives shall not be used. |  |
| Comments |
| **6.2 Maintenance** |
| **Statement of Intent** | **A system of planned maintenance shall be in place covering all items of equipment which are critical to product safety, legality and quality.** |  |
| 6.2.1X | Planned maintenance systems shall be in place for plant and equipment that generates and maintains temperature-controlled areas. |  |
| 6.2.2 | The site shall ensure that the safety, legality or quality of product is not jeopardised during maintenance operations. |  |
| 6.2.3 | X | All third-party contractors and engineers shall be aware of and shall adhere to the site’s operating standards. Where appropriate, this shall include the site’s hygiene standards and contamination control policies. |  |
| 6.2.4 |  | Cleaning or replacing light fittings and glass shall be done in a manner such as to minimise the potential for product contamination. |  |
| 6.2.5 | Records shall be kept of vehicle and equipment maintenance. |  |
| 6.2.6X | Where open food products are stored, handled or transported, food grade lubricants shall be used. |  |
| Comments |
| **6.3 Calibration and control of measuring and monitoring devices** |
| **Statement of Intent** | **Measuring equipment used to monitor critical control points and product safety and legality shall be identified. The identified measuring equipment shall be calibrated and adjusted or its accuracy verified.** |  |
| 6.3.1X | The company shall calibrate and where necessary adjust the identified measuring and monitoring devices to ensure accuracy within agreed parameters at a predetermined frequency. Where adjustment is not possible, inaccurate equipment shall be replaced. |  |
| 6.3.2X | Equipment specified to measure critical control points and legality shall be traceable to a recognised national standard. |  |
| 6.3.3X | Records of the results of calibration and verification shall be maintained. |  |
| 6.3.4X | The measuring and monitoring devices shall be identified and marked in accordance with calibration requirements. |  |
| 6.3.5X | The identified measuring and monitoring devices shall be prevented from being adjusted by unauthorised staff. |  |
| 6.3.6X | The identified measuring and monitoring devices shall be protected from damage, deterioration or misuse. |  |
| 6.3.7X | Procedures shall be in place to record actions taken when the identified measuring and monitoring devices are found not to be operating within specified limits. |  |
| Comments |
| **6.4 Housekeeping and hygiene** |
| **Statement of Intent** | **Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained at all times and that risk of contamination is minimised.** |  |
| 6.4.1 |  | Documented cleaning schedules shall be in place and implemented for the building, vehicles, plant and all equipment. The frequency and depth of cleaning shall be based on risk. |  |
| 6.4.2 | Cleaning practices shall be completed so as to maintain a suitable environment for the storage and distribution of products. Practices shall minimise risk of contamination to the product. |  |
| 6.4.3 | X | Where clean in place (CIP) systems are in use for cleaning tankers, these shall be designed and operated to ensure effective cleaning, commensurate with the products transported. |  |
| 6.4.4 | Adequate staff, facilities and equipment shall be provided to allow cleaning to be undertaken at a level commensurate with the activities being undertaken by the site. |  |
| 6.4.5 | Records shall be maintained of cleaning undertaken. This shall include any cleaning of vehicles carried out by subcontractors (e.g. tanker cleaning) and, where required by customers, cleaning certificates. |  |
| 6.4.6 |  | Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers’ instructions. |  |
| 6.4.7 | Where appropriate, the effectiveness of the cleaning and sanitation procedures shall be verified and recorded. |  |
| Comments |
| **6.5 Waste and waste disposal** |
| **Statement of Intent** | **There shall be adequate systems for the collection, collation and disposal of waste material.** |  |
| 6.5.1 | Systems shall be in place to minimise the accumulation of waste in handling and storage areas. |  |
| 6.5.2X | External waste collection containers and compactors shall be managed in such a manner as to contain products and not attract pests. Containers holding food products or packaging shall be covered or closed. |  |
| 6.5.3 | X | Products that require specific conditions for disposal shall be separated and disposed of using licensed contractors and in compliance with any legal requirements. |  |
| 6.5.4X | In the event that substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be in the business of secure product or waste disposal and shall provide records of material destruction or disposal. |  |
| 6.5.5X | Surplus customer-branded products shall be disposed of in accordance with customer-specific requirements. Customer brand names shall be removed from packed surplus products before the product enters the supply chain unless otherwise authorised by the customer. |  |
| 6.5.6X | Where customer-branded products which do not meet specification are sold to staff or passed on to charities or other organisations, this shall be with the prior consent of the brand owner. Processes shall be in place to ensure that all products are fit for consumption and meet legal requirements. |  |
| Comments |
| **6.6 Pest control** |
| **Statement of Intent** | **The company shall be responsible for minimising the risk of pest infestation on the site.** |  |
| 6.6.1 |  | If pest activity is identified it shall not present a risk of contamination to products.The presence of any infestation on site shall be documented in pest control records and be part of an effective pest management programme to eliminate or manage the infestation so that it does not present a risk to products. |  |
| 6.6.2XD | The company shall either contract the services of a competent pest control organisation, or shall have trained personnel, for the regular inspection and treatment of premises, in order to deter and eradicate infestation. |  |
| 6.6.3XD | Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities of the site. |  |
| 6.6.4XD | The location of all pest control measures shall be identified on a plan/diagram of the site. |  |
| 6.6.5XD | Results of pest control inspections shall, on a regular basis, be assessed and analysed for trends. |  |
| 6.6.6XD | Detailed records shall be kept of the pest control inspections, recommendations and necessary actions undertaken. |  |
| 6.6.7XD | All products shall be stored so as to minimise the risk of infestation. Where stored-product pests are considered a risk, appropriate measures shall be included in the control programme. |  |
| 6.6.8XD | Documentation shall detail the safe use and application of baits and other materials such as insecticide sprays or fumigants. |  |
| Comments |
| **7 Good operating practices** |
| **7.1 Receipt of goods** |
| **Statement of Intent** | **Goods acceptance procedures shall be in place to ensure products are within specification before acceptance.** |  |
| 7.1.1X | Where specific measurable conditions, such as temperature, are critical to the safety, quality or legality of products, processes shall be in place to ensure requirements are fulfilled before acceptance. |  |
| 7.1.2XD | There shall be a procedure for inspection of loads on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition. |  |
| 7.1.3XD | Procedures shall also be in place to ensure that the loads or products have been held under secure conditions before acceptance. |  |
| 7.1.4XD | Where products are marked with a durability code, the residual shelf life shall be checked to ensure this meets any specified customer minimum and assist in stock rotation. |  |
| Comments |
| **7.2 Product handling** |
| **Statement of Intent** | **Product handling and movement shall be carried out to minimise the risk of product damage.** |  |
| 7.2.1 | Personnel shall be aware of any products requiring specific handling conditions and be trained in appropriate procedures. |  |
| 7.2.2 | The loading of vehicles or shipping containers shall be carried out in a manner which prevents damage, and loads shall be secured to prevent movement during transit. |  |
| 7.2.3X | Where products are repacked onto pallets for storage or further distribution, the packing configuration shall prevent the risk of damage (e.g. overhanging cases). Where required, repacked pallets shall be band-wrapped to prevent damage in storage or distribution. |  |
| 7.2.4XD | Products shall be stored off the floor either on pallets or racking. |  |
| Comments |
| **7.3 Environment control** |
| **Statement of Intent** | **Where the storage environment (e.g. temperature or controlled atmosphere) is critical to product safety, legality and quality, during handling and storage this shall be adequately controlled, monitored, recorded and verified.** |  |
| 7.3.1X | Monitoring shall be carried out in accordance with product specification requirements and/or specified procedures. |  |
| 7.3.2 | X | In circumstances where temperature control is required, manual or automatic temperature and/or time-recording equipment linked to an automatic alarm system shall be used to monitor temperature. |  |
| 7.3.3X | In circumstances where a controlled atmosphere is critical to product safety, quality or legality, manual or automatic gas proportioning and/or time-recording equipment shall be used to monitor, at an appropriate frequency, the gas proportions in the controlled atmosphere. |  |
| 7.3.4X | Facilities shall be adequate to maintain products within the temperature range specified for the product specification. |  |
| 7.3.5 | X | Where temperature control is required, product handling and transfer operations shall be undertaken so as to maintain temperature control. Maximum limits on the period of time that particular types of products may remain outside a temperature-controlled environment shall be defined. |  |
| 7.3.6X | In the case of equipment failure, procedures shall be in place to establish, in conjunction with the product owner, the safety status and effect on the quality of the product prior to release to distribution. |  |
| 7.3.7 | X | Where temperature, humidity or controlled-atmosphere stores are used, the level of uniformity of the environmental condition under control (e.g. temperature distribution) shall be established and where necessary restrictions on product placement be identified. |  |
| 7.3.8X | In the event of changes to equipment, the company shall, where appropriate, re-establish the performance capability within the storage area. |  |
| Comments |
| **7.4 Physical and chemical product contamination risk** |
| **Statement of Intent** | **Appropriate facilities and procedures shall be in place to control the risk of physical or chemical contamination of product including allergens.** |  |
| 7.4.1 |  | Detailed written procedures for handling glass and brittle material breakages in the storage, product-handling or load-carrying area of vehicles shall be in place to ensure the necessary precautions are taken. |  |
| 7.4.2 | All spillages or breakages that pose risk of product contamination shall be recorded in an incident report. |  |
| 7.4.3 | X | Where allergenic materials are stored or transported, the potential risk of cross-contamination shall be assessed and any necessary additional spillage controls incorporated. Where allergenic materials are packaged in a format at particular risk of damage (e.g. paper sacks) designated storage areas shall be used to reduce risk of damage and cross-contamination of other products. |  |
| Comments |
| **7.5 Stock rotation** |
| **Statement of Intent** | **Procedures shall be in place to ensure products are used in the correct order and within the allocated shelf life.** |  |
| 7.5.1 | Receipt documents and/or product labelling shall facilitate correct stock rotation. |  |
| 7.5.2XD | An effective system shall be in place for identifying the location of stock within the storage area to facilitate stock rotation. |  |
| 7.5.3XD | Product shall be handled with due regard to stated shelf life for onward sale, and shall be in compliance with minimum specified shelf life on delivery where this is specified by customers. |  |
| Comments |
| **7.6 Product release** |
| **Statement of Intent** | **The company shall ensure that product is not released unless all release procedures have been followed.** |  |
| 7.6.1 | XD | Where products require positive release, procedures shall be in place to ensure that the release does not occur until all release criteria have been met and the release has been authorised. Records shall be retained. |  |
| 7.6.2 | XD | In circumstances where release of product is authorised by the owner of the products or legal clearance (e.g. customs), the management shall have systems in place to ensure that authority for release has been provided prior to dispatch. Evidence of authorisation shall be retained. |  |
| Comments |
| **8 Personnel** |
| **8.1 Training and competency** |
| **Statement of Intent** | **The company shall ensure that all employees are adequately trained, instructed and supervised to a degree commensurate with their activity and are demonstrably competent to carry out their activity.** |  |
| 8.1.1 | All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. |  |
| 8.1.2 | The company shall have documented training procedures and documented training records to demonstrate that the training is appropriate and effective. |  |
| 8.1.3 |  | Where personnel are engaged in activities relating to critical control points (CCPs), they shall receive specific training relevant to the CCPs. Where personnel carry out activities which could affect product safety, legality and quality, the company shall ensure that personnel have been trained in the best-practice operating principles for the particular task. |  |
| 8.1.4 | The company shall routinely review the competencies of staff and provide relevant training as appropriate. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience. |  |
| Comments |
| **8.2 Personal hygiene** |
| **Statement of Intent** | **The site’s personal-hygiene standards shall be documented and adopted by all personnel, including agency staff and visitors to the location, with due regard to risk of product contamination.** |  |
| 8.2.1 | The site’s personal-hygiene standards shall include policy for the following:* the wearing of protective clothing/work-wear
* the wearing of jewellery
* smoking, eating and drinking
* hand-cleaning/personal hygiene
* reporting of sickness.
 |  |
| 8.2.2 | The requirements for personal hygiene shall be communicated to all personnel, agency staff and visitors. Compliance with the requirements shall be checked regularly. |  |
| 8.2.3 | Smoking (where permitted under law), eating and drinking shall only be permitted in designated areas and shall not be permitted in storage and product-handling areas. |  |
| 8.2.4XR | Where work-wear is provided, this shall be maintained in a good and clean condition. Additional requirements shall be met where open food is stored, handled or distributed. |  |
| 8.2.5X | Protective clothing shall be provided for those employees working with open food. The protective clothing shall be designed and maintained so as not to pose a contamination risk to the product. |  |
| 8.2.6X | Protective clothing shall be laundered effectively on a regular basis. A system shall be in place to ensure the effectiveness of the laundering process. |  |
| 8.2.7X | Disposable protective clothing, if used, shall be subject to adequate control to avoid product contamination. |  |
| 8.2.8X | All hair shall be fully contained to prevent product contamination. |  |
| 8.2.9X | All cuts and grazes on exposed skin shall be covered by a contrasting-coloured plaster that is site-issued and monitored. |  |
| 8.2.10X | There shall be a procedure for the notification by employees, including temporary employees, of the details of any relevant infectious disease or condition with which they may have come into contact or from which they may be suffering. |  |
| Comments |

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| **9 Purchasing – branded products** |
| **Statement of Intent** | **The company shall have systems in place to ensure that products which are purchased for resale are safe, legal and meet customers’ expectations of quality.** |  |
| **9.1 Supplier approval and performance monitoring** |
| **Statement of Intent** | **The wholesaler shall operate procedures for approval and monitoring of its suppliers of purchased product.** |  |
| 9.1.1 | The company shall have a documented supplier approval procedure which shall be risk-based and clearly define the criteria to be met. The approval process shall consider the type of product and manufacturing facility, where the product was manufactured and potential risks in the supply chain to the point of receipt of the goods by the wholesaler. Supplier approval may be based on:* enforceable warranties from the supplier
* historical trading relationship and brand reputation
* supplier manufacturing site questionnaire
* certification of the manufacturing site, e.g. BRCGS
* reliable third-party audit of the manufacturing site
* supplier inspection
* demonstrable controls in place by a selling agent or broker.
 |  |
| 9.1.2 | There shall be a defined process for the ongoing assessment of approved suppliers based on risk and performance including complaints. The process shall be fully implemented. |  |
| 9.1.3 | The procedures shall define how exceptions are handled, e.g. the purchase of products where audit or monitoring has not been undertaken. |  |
| Comments |

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| **10 Purchasing and management of wholesaler own-label products and wholesaler exclusive brands** |
| **10.1 Supplier approval and performance monitoring** |
| **Statement of Intent** | **The wholesaler shall operate procedures for approval and monitoring of the manufacturers and packers of own-label and exclusive brand products.** |  |
| 10.1.1 | The company shall have a documented supplier approval procedure which identifies the process for the initial and ongoing approval of suppliers and manufacturers/processors of each product traded. The requirements shall be based on the results of a risk assessment that shall include consideration of:* the nature of the product and associated risks
* customer-specific requirements
* legislative requirements in the country of sale or importation of the product
* source or country of origin
* potential for adulteration or fraud.
 |  |
| 10.1.2 | The approval and monitoring procedure shall be based on risk and include one or a combination of:* certification (e.g. to BRCGS or other GFSI-recognised scheme)
* supplier/third-party audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor

or, for suppliers assessed as low risk only, supplier questionnaires.Where approval is based on questionnaires, these shall be re-issued at least every 3 years and suppliers will be required to notify the site of any significant changes in the interim.The site shall have an up-to-date list of approved suppliers. |  |
| 10.1.3 | There shall be a documented process for the ongoing assessment of approved suppliers based on risk and performance, including complaints. The process shall be fully implemented. |  |
| Comments |
| **10.2 Product authenticity** |
| **Statement of Intent** | **The wholesaler shall ensure that systems are in place to minimise the risk of purchasing fraudulent or adulterated products.** |  |
| 10.2.1 | A documented vulnerability assessment shall be carried out on all products to assess the potential risk of adulteration or substitution. This shall take into account:* historical evidence of substitution or adulteration
* economic factors which may make adulteration or substitution more attractive
* ease of access to product through the supply chain
* sophistication of routine testing to identify adulterants
* nature of the raw materials.

The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risk. It shall be formally reviewed on an annual basis. |  |
| 10.2.2 | Where products are identified as being at particular risk of adulteration or substitution, appropriate assurance and/or testing processes shall be in place to reduce the risk. |  |
| Comments |
| **10.3 Product design/development** |
| **Statement of Intent** | **The wholesaler shall ensure that the development and product approval process ensures that products are safe and legal and that a hazard analysis study is undertaken.** |  |
| 10.3.1 | There shall be a procedure for the assessment and approval of products to be sold as wholesaler own-brand or exclusive brands. |  |
| 10.3.2 | The wholesaler shall, where appropriate, ensure that suppliers undertake factory trials and carry out thorough product conformity checks to verify that product formulation and manufacturing processes are capable of producing a safe and legal product. |  |
| 10.3.3 | The wholesaler shall have a process to ensure that the product label is legal for the known designated country of sale and in accordance with the appropriate product specification. |  |
| 10.3.4 | Wholesalers shall have processes in place to ensure that they are notified of changes in product formulation or process and that any such changes have been adequately assessed for safety and legality. |  |
| 10.3.5 | Product shelf life shall be established, taking into account product formulation, packaging, factory environment and subsequent storage conditions. The shelf life shall be approved by the wholesaler. |  |
| 10.3.6 | The wholesaler shall ensure that shelf life trials are undertaken using documented protocols, and results documented and retained. |  |
| Comments |
| **10.4 Specifications** |
| **Statement of Intent** | **The company shall ensure that appropriate specifications exist for all wholesaler own-brand and wholesaler exclusive products.** |  |
| 10.4.1 | Specifications shall be adequate and accurate, and ensure compliance with relevant safety and legislative requirements. These shall include key data to meet legal requirements and assist the user in the safe usage of the product. |  |
| 10.4.2 | Specifications shall be reviewed whenever products change (e.g. ingredients, processing methods) or at least every 3 years to ensure adequacy and status. The date of review and the approval of any changes shall be recorded. |  |
| Comments |
| **10.5 Traceability** |
| **Statement of Intent** | **The wholesaler shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company.** |  |
| 10.5.1 | The company shall maintain a traceability system for all batches of product which identifies the last manufacturer or, in the case of primary agricultural products, the packer or place of last significant change to the product. Records shall also be maintained to identify the recipient of each batch of product from the company. |  |
| 10.5.2  | The company shall test the traceability system at least annually to ensure that traceability can be determined back to the last manufacturer and forward to the recipient of the product from the company. This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the company (e.g. each movement and intermediate place of storage).The traceability test shall include the reconciliation of quantities of product received by the company for the chosen batch or product lot. Traceability should be achievable within 4 hours (1 day when information is required from external parties). |  |
| Comments |
| **10.6 Product inspection and analysis** |
| **Statement of Intent** | **The wholesaler shall undertake or subcontract product inspection and analyses that are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.** |  |
| 10.6.1 | Monitoring of incoming products for compliance to specification shall be based on risk assessment. Inspection method, frequency of inspection and procedures shall be specified and documented. Suppliers of incoming materials, as appropriate, shall provide evidence of guarantees, certifications/declarations of analysis or certificates of conformity. |  |
| 10.6.2 | Where claims are made about products handled or the raw materials used, including the provenance, chain of custody and assured or ‘identity preserved’ status (see Glossary in Appendix 5), supporting information shall be available from the supplier or independently to verify the claim. |  |
| 10.6.3 | Where the wholesaler undertakes analyses that are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. |  |
| 10.6.4 |  | Personnel undertaking product testing and analyses shall be suitably qualified and/or trained, and be shall be competent to carry out the analyses required. |  |
| Comments |
| **10.7 Management of product withdrawal and product recall** |
| **Statement of Intent** | **The wholesaler shall have a plan and system in place to enable the withdrawal and recall of products should this be required.** |  |
| 10.7.1 | The company shall have a documented product withdrawal and recall procedure. This shall include, as a minimum:* identification of key personnel constituting the recall management team, with clearly identified responsibilities
* guidelines for deciding whether a product needs to be recalled or withdrawn, and the records which need to be maintained
* an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority)
* a communication plan, including the provision of information to customers, consumers and regulatory authorities in a timely manner
* details of external agencies providing advice and support as necessary (e.g. specialist laboratories, regulatory authorities and legal experts)
* a plan to handle the logistics of traceability, recovery or disposal of affected product, and stock reconciliation.

The procedure shall be operable at any time. |  |
| 10.7.2 | The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary. |  |
| 10.7.3 | In the event of a product recall being initiated by the wholesaler, the certification body that issued the current certificate for the site against this Standard shall be informed within 3 working days of the decision to issue a recall. |  |
| Comments |

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| **11 Contractual arrangements (all services)** |
| **Statement of Intent** | **All contracted services undertaken shall be clearly specified and reviewed prior to acceptance to ensure that requirements can be met, any risks to other products are assessed and any necessary controls implemented.** |  |
| 11.1 | The company shall enter into formal contractual arrangements with the customer, specifying the requirements of the service undertaken to satisfy their customer’s specific needs. |  |
| 11.2 | The company shall review the service specification to ensure that it has the resources and suitable equipment to undertake the service to the specification required. |  |
| 11.3 | The company shall ensure that services are included within the site’s hazard and risk assessment (see Requirements, section 2). New products or service components shall be assessed to identify any additional potential risks and appropriate controls. |  |
| 11.4 |  | The procedures to undertake the service shall be documented and understood by the staff responsible for undertaking the work. |  |
| 11.5 |  | Staff shall receive training as required to deliver the services to the specification agreed. |  |
| 11.6 | Appropriate recorded checks shall be undertaken to ensure that the contracted service is delivered to the customer-specified limits. |  |
| Comments |
| **12 Product inspection** |
| **Statement of Intent** | **Where a product inspection service is provided to ensure the quality or legality of products, this shall be undertaken using appropriate procedures, facilities and standards.** |  |
| 12.1 | Where inspection is undertaken on behalf of a customer, the service requirements shall be clearly defined and include:* any specific handling requirements for the materials being inspected, e.g. temperature controls
* sort criteria (rejection/acceptance criteria)
* sampling rate
* reporting protocol
* instructions on the action to be taken with defective/rejected product.
 |  |
| 12.2 | The company shall undertake a contract review before accepting the work to ensure that it has the facilities, resources and competence to undertake the inspection service required. |  |
| 12.3 | The company shall carry out a risk assessment before undertaking work to identify any potential risks to other products handled or stored, e.g. resulting from damage or spillage during inspection. Appropriate controls shall be implemented to prevent, or reduce to acceptable levels, any risk identified. |  |
| 12.4 | Inspection methodology and procedures shall be documented and clearly understood by staff undertaking the work. |  |
| 12.5 |  | Where equipment is used as part of the inspection process, this shall be calibrated and its operation verified to ensure the effectiveness of the inspection process. |  |
| 12.6 | Records shall be maintained of the inspection activity including:* quantities of rejected product
* code information to enable traceability
* sampling or test results to establish the efficiency of the sorting process
* calibration records for any equipment used in the inspection process.
 |  |
| Comments |
| **13 Contract packing (repacking, assembly packing)** |
| **Statement of Intent** | **Where repacking, labelling or other secondary packing operations are undertaken (on packed product), these shall be managed to ensure the safety, quality and legality of the products.** |  |
| 13.1 | A risk assessment shall be carried out of the proposed packing operation to establish potential risks to product safety and quality and establish suitable controls to mitigate the risk. |  |
| 13.2 | Product and packaging materials shall be stored under conditions to prevent the risk of contamination and deterioration. Any part-used product or packaging materials shall be effectively protected before being returned to storage. |  |
| 13.3 | Where labels/sleeves are applied as part of the process undertaken:* there shall be a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packaging machines
* where off-line coding or printing of packaging materials occurs, checks shall be in place so that only correctly printed material is available at the packaging machines.
 |  |
| 13.4 |  | Documented checks of the line shall be carried out before commencement of packing and following changes of product. These shall ensure that areas have been suitably cleared and are ready for the next packing run. Documented checks shall be carried out at product changes to ensure that all products and packaging from the previous packing run have been removed from the line before starting the next packing run. |  |
| 13.5 |  | Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks:* at the start of the packing run
* during the packing run
* when changing batches of packaging materials
* at the end of each packing run.

The checks shall also include verification of any printing carried out at the packing stage including:* date coding
* batch coding
* quantity indication
* pricing information
* bar coding
* country of origin.
 |  |
| 13.6 |  | Where on-line vision equipment is used to check product labels and printing, procedures shall be in place to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification. |  |
| 13.7 | Records shall be maintained to ensure full traceability of all component parts and of the finished packed product. The system shall be regularly tested to ensure that traceability can be determined. |  |
| 13.8 | Where rework or any reworking operation is performed, this shall be taken into account with respect to the traceability system. |  |
| 13.9 |  | Where weights of the final packed products are checked, this shall be in accordance with specification and the legal requirements in the country of sale. Records of checks shall be maintained. |  |
| 13.10 | Inventories shall be maintained of components, packed product and waste. The disposal of unused components and waste shall be in accordance with the requirements of the customer. |  |
| 13.11 |  | Finished product checks shall be carried out in accordance with the customer’s requirements and records maintained. |  |
| 13.12 | The organisation shall identify, verify, protect and safeguard customer property provided for use or incorporation into the product. If any customer property is lost, damaged or otherwise found to be unsuitable for use, this shall be reported to the customer and records maintained. |  |
| Comments |
| **14 Quantity control inspection** |
| **Statement of Intent** | **Where the company undertakes quantity control, the system shall conform to the customer requirement.** |  |
| 14.1 |  | The frequency and methodology of quantity checking shall meet the requirements of legislation governing quantity verification, irrespective of the nature of the pre-pack, e.g. minimum weight, average quantity, average weight, measuring container or quantity. |  |
| 14.2 | If the company undertakes quantity control on imported pre-packed material intended for sale, it shall be able to demonstrate compliance with the legal requirements where the product is available to the ultimate consumer. |  |
| 14.3 | Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer specification requirements. |  |
| 14.4 | All equipment used for quantity measurement shall be legally acceptable and regularly calibrated. |  |
| 14.5 | Underweight/volume or rejected products shall be disposed of in accordance with the customer’s requirements. |  |
| 14.6 | Records shall be maintained of the quantity checks and shall be in a format which is legally acceptable in the country where the products will be sold. |  |
| Comments |
| **15 Contract chilling/freezing/tempering/defrost and high-pressure process operations** |
| **Statement of Intent** | **Where the site undertakes contract chilling/freezing/tempering, defrost or high pressure process operations on pre-packaged product, it shall undertake such operations in accordance with specifications provided by the owner of the product, and ensure that the processes are monitored and that product safety, legality and quality characteristics are not compromised.** |  |
| 15.1 | The site shall operate procedures to verify that the processes and equipment employed are capable of meeting the specified requirements of the customer. |  |
| 15.2 | Process validation shall be undertaken in accordance with the requirements of the owner of the product. |  |
| 15.3 | The process shall be monitored by the use of real-time temperature-recording equipment linked to an automatic failure alarm system or, where appropriate, manual checks at a suitable frequency. |  |
| 15.4 | In the case of equipment failure or process deviation, procedures shall be in place immediately to advise the owner of the product and to take any action as required by the owner of the product. |  |
| Comments |
| **16 Contract cleaning of baskets, roll cages and other distribution containers** |
| **Statement of Intent** | **Where the site undertakes contracted cleaning of equipment, this shall be carried out effectively and without risk to other products stored or distributed.** |  |
| 16.1 | The cleaning area shall be suitably segregated from product storage and handling areas to prevent any risk of contamination of products. |  |
| 16.2 | The layout of the cleaning area shall ensure the segregation of clean from unclean items. |  |
| 16.3 | Drainage facilities shall be adequate to prevent accumulation of water. |  |
| 16.4 | Ventilation shall be adequate to prevent any risk of condensation forming in product storage areas. |  |
| 16.5 | Equipment used for cleaning shall be well maintained and serviced at a frequency to ensure optimum performance. |  |
| 16.6 | Where automatic equipment is used, specified limits shall be established for optimum operating performance, e.g. detergent dosing levels, wash/rinse/drying temperatures, operating speed and performance monitored to ensure these are achieved. |  |
| 16.7 |  | The site shall operate procedures to verify that the processes and equipment employed are capable of meeting the specified requirements of the customer. |  |
| Comments |
| **17 Waste recovery and recycling** |
| **Statement of Intent** | **Where the site undertakes to back-haul waste materials/packaging for recycling or disposal on behalf of a customer, this shall be carried out in a safe hygienic manner in accordance with legal requirements.** |  |
| 17.1 |  | The company shall clearly specify the types of materials that will be handled and any exceptions. This information shall be available to the driver. |  |
| 17.2 | The layout of the receiving area for waste materials shall ensure adequate segregation from product receipt, handling and storage areas. |  |
| 17.3 | Where company-owned or contracted vehicles are used for the collection of waste materials from the customer:* there shall be adequate segregation from products being transported to prevent contamination of product and its packaging
* vehicles shall be suitably cleaned before re-use for transporting products.
 |  |
| 17.4 | The handling of materials received for waste/recycling shall be carried out in a manner which prevents the risk of contamination of products. |  |
| 17.5 | Waste/recycled materials shall be stored in a manner which does not attract or present harbourage for pests. |  |
| 17.6 | Where specifications exist from the customer for the waste materials, e.g. levels of purity for materials for recycling, there shall be processes in place to ensure these are achieved. |  |
| 17.7 | Where the ultimate disposal of materials is governed by legal requirements, these shall be understood and the site and waste contractors licensed as appropriate. |  |
| Comments |