Audit Report

Global Standard for Food Safety Issue 8: August 2018

1.Audit Summary			
Company name	Anhui Tiger Vitamin Development Co, Ltd.	Site Code	7884263
Site name	Anhui Tiger Vitamin Development Co, Ltd.		
Scope of audit	Raw material acceptance, saponification, decarboxylation, rectification, condensation, addition, aromatic hydrolysis, decolorization, refining and food grade package packing of Vitamin B6 (pyridoxine hydrochloride).		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Finish Date	2020-06-19		
Re-audit due date	2021-06-18		

Additional modules included			
Modules	Result	Scope	Exclusions from scope
Choose a module	Choose an item	N/A	
Choose a module	Choose an item	N/A	

Head Office	N/A

2. Audit Results					
Audit result	Certified	Audit grade	B	Audit type	Announced
Previous audit grade	N/A (First Certification)	Previous audit date	N/A (First Certification)		

2. Audit Results

Certificate issue date	2020-07-22	Certificate expiry date	2021-07-30

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	12

3.Company Details

Address	North of Weisi Road, Economic Development Zone, Guzheng County, Bengbu City, Anhui Province, P. R. China		
Country	P. R. China	Site Telephone Number	+86-0552-6027217
Commercial representative Name	Mrs. Gao Yan	Email	634083487@QQ.com
Technical representative Name	Mrs. Gao Yan	Email	634083487@QQ.com

4.Company Profile

Plant size (metres square)	16788	No. of employees	256	No. of HACCP plans	1

Shift Pattern	Three shift, 8:00-18:45, 18:45-8:00
Subcontracted processes	N/A
Other certificates held	ISO9001,ISO14001
Regions exported to	EU/North America/South America/Africa /Asia/Ocean
Company registration number	N/A

4.Company Profile

Major changes since last BRCGS audit	N/A(First Certification)

Anhui Tiger Vitamin Development Co., Ltd., a subsidiary of ANHUI BBCA GROUP, is founded in January 2017, located north of Weisi Road, Economic Development Zone, Guzheng County, Bengbu City, Anhui Province, P. R. China. The company registered capital is 50 million yuan, covers area of more than 16000 square meters. The annual production capacity of vitamin B6 is 200,000 tons. The products sell well in EU, North America, South America, Africa, Asia ,Oceana and supply products for more than 200 embassies (consulates) .The factory was certified by CQC according to the Standard of ISO 9001, ISO14001.
Product Safety Certification No. SC20134032309899.

5.Product Characteristics

Product categories	15- Dried foods and ingredients
Finished product safety rationale	Ambient environment, long shelf life, pH≤4.0

High care	No	High risk	No	Ambient high care	No

Justification for area	The product was ambient storage requirement.
Allergens handled on site	None
Product claims made e.g. IP, organic	None
Product recalls in last 12 Months	None
Products in production at the time of the audit	Vitamin B6

6.Audit Duration Details			
On-site duration	24 man hours	Duration of production facility inspection	12 man hours
Reasons for deviation from typical or expected audit duration	None		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (Fist date)	2020-06-18	09:00	18:00
2(finished date)	2020-06-19	08:00	11:30

	Auditor (s) number	Name	Role
Auditor Number	260011	Sun Xiaoqiang	Auditor Leader
Second Auditor Number	260017	Xue Changhui	Auditor

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11) Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Yang Jiayou / General Manager	X			X
Wu Zijian / QC manager	X	X	X	X

Present at audit				
Gao Yan / QC Supervisor	X	X	X	X
Tian Sixia / QA Supervisor	X	X	X	X
Liu Wei / Workshop Manager	X	X	X	X
Lu Yuxiang / Workshop Manager	X	X	X	X
Wang Hai / Workshop Manager	X	X	X	X
Xiao Qian / Workshop Manager	X	X	X	X
Zhu Huaitian / Workshop Manager	X	X	X	X
Xu Nana / Purchase Department Supervisor	X		X	X
Wang Rui / Sales Supervisor	X		X	X
Wu Hong / Administration Department Supervisor	X		X	X
Mu Lianmin / Warehouse Supervisor	X	X	X	X

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced
N/A	N/A	N/A

Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements				
No.	**Requirement ref.**	**Details of non-conformity**	**Critical or Major?**	**Anticipated re-audit date**
	None			

Critical			
No.	**Requirement ref.**	**Details of non-conformity**	**Anticipated re-audit date**
	None		

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan**	**Root cause analysis**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Requirement ref.**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan**	**Root cause analysis**	**Date reviewed**	**Reviewed by**
1	1.1.2	The food safety cultural measures schedule was not available.	Plans and measures were put in place to enhance food safety awareness.	To continuously reinforce food safety measures, enhance food safety awareness, and establish food safety culture.	Lacking of promotion of food safety culture. Lacking of pertinence and planning.	2020-07-12	Sun Xiaoqiang
2	2.1.1	Didn't provide evidence of HACCP knowledge training for HACCP team leader.	Summarized the training of that day and formed meeting minutes.An internal inspector certificate	To make records in time after training. To strengthen the training policy according to corporate laws and	Staff were trained according to the original plan, but a record document was not provided.	2020-07-12	Sun Xiaoqiang

			was issued by inspection agency.	policies.			
3	3.2.1	The metal detection operating procedure document in the packing room was not numbered.	The metal detector has been assigned a code of operation TG-B6EF-009-01-09.	To train personnel on document traceability and strengthen document number management.	Incorrect understanding about the concept of “controlled documents”.	2020-07-12	Sun Xiaoqiang
4	4.7.2	Maintenance tools are stored in the grinder in the inner packing shop.	The inner part of the crusher has been sorted out, and the tools are placed in isolation.	To improve the storage requirements of relevant articles in SOP and put in place for isolation.	Insufficient personal awareness.	2020-07-12	Sun Xiaoqiang
5	4.8.4	There was no sign of hand washing disinfection, no hot water for hand washing.	The water heating device is now in place.	To arrange relevant training for personnel and to post signs on site.	Managers’ had insufficient knowledge on requirements of food safety equipment and facilities according to BRC system.	2020-07-12	Sun Xiaoqiang
6	4.9.1.1	The lubricating oil stored in the discharging equipment of the internal packaging workshop was not marked.	The lubricant has been labelled and placed in isolation at designated points.	To arrange relevant training for personnel and to improve SOP and stipulate its requirements.	Management and operators had insufficient understanding of the importance of BRC food safety protection labels.	2020-07-12	Sun Xiaoqiang
7	4.9.2.1	In the inner packing room, the nuts of the	Now we have checked and registered the	To arrange relevant training for personnel	Management were lack of consciousness and	2020-07-12	Sun Xiaoqiang

		stainless steel table falls off.	fragile items on site, and changed the table into a screw-free integrated table.	and to improve SOP and stipulate its requirements. To require employees to guard against foreign body risk in the production process.	didn't make effective rules and regulations ,which lead to hazards.		
8	4.9.3.1	In the inner packing workshop, the grinder was wrapped with transparent tape.	The transparent tape has been removed from the device.	To arrange relevant training for personnel. To require employees to guard against foreign body risk in the production process.	Management were lack of consciousness about foreign matter risks, which lead to hazards.	2020-07-12	Sun Xiaoqiang
9	4.14.8	In the inner packing room, the dead insects adhered to the fly lamp were not cleaned in time.	Site pest control has been checked and cleared.	To formulate corresponding management system and reinforce its implementation.	Due to the outsourcing of pest control, the management did not pay enough attention to the secondary work, leading to the failure of timely cleaning and maintenance of equipment.	2020-07-12	Sun Xiaoqiang
10	5.1.4	Failure to provide a scientific basis for 24 months of product shelf	According to the standard of food additive vitamin	After inquiry of food additive vitamin VB6 (GB14753-1993)	The production cycle of the product has lasted for more than a few	2020-07-12	Sun Xiaoqiang

		life.	B6(GB14753-1993) and the standard of feed additive vitamin B6(GB7302-2018), we formulated description of the effective period of the product.	edition standard, we get that the validity period of this product should be 36 months. Meanwhile, feed additive vitamin B6(GB7302-2018) has a validity life of 24 months. The validity period of the products is 4 years and stability field test on stability by our company has been done for one year.	years. Although I have consulted relevant data before determining the validity period of the product, I have not collected data and formed a report.		
11	5.6.2.4	Can not provide evidence of laboratory capability comparison.	The products have been compared in the laboratory.	In the future, we will compare the personnel, equipment and laboratory of products irregularly to ensure that the quality and safety of products are effectively controlled.	The consciousness of providing evidence is weak, and there is no summary of detection and comparison.	2020-07-12	Sun Xiaoqiang
12	6.4.3	Summary report of traceability and material balance not provided.	Summary of traced products, Traceability report and Material balance report have been completed.	In view of this phenomenon, personnel were trained on BRC traceability provisions, and specific	Insufficient understanding of traceability in the system, no summary and report of	2020-07-12	Sun Xiaoqiang

				details were emphasized. Products were traced irregularly according to BRC traceability requirements in daily system operation.	traceability from raw materials to finished products.		

Comments on non-conformities
The non-conformities main occurred in pest management, physical contamination, food protection and metal contamination management.. All corrective action had finished.

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No.	**Requirement ref.**	**Details of non-conformity**	**Anticipated re-audit date**
	None		

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Corrective action taken**	**Proposed preventive action plan**	**Root cause analysis**	**Date reviewed**	**Reviewed by**

No.	Requirement ref.	Details of non-conformity	Corrective action taken	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Its GM demonstrated they were fully committed to the implementation of the requirements of the Global Standard for Food Safety including provision of adequate resources, effective communication, systems of review and actions taken to effect continual improvement, and opportunities for improvement was identified, implemented and fully documented.

Food safety and quality policy was stated in the food safety management manual (QM/TGWSS-A) by GM on 2020-01-01 and implemented. The policy is communicated to stuff by meeting and training. The company identified the quality objectives clearly. Documented food safety policy was stated as Keep improving, to create first-class.
The quality objects were established as followed:
The qualified rate of one-time inspection is100%, the content of food additive VB 6 is between 98% to 100.5%, ensure product safety, Heavy metal ((Pb) content ≤10mg/kg, As ≤2mg/kg.
Customer satisfaction rate ≥90%;

Sub-quality objects are set for different department and all employees were trained about it and training record was in place for review. The food safety and quality meeting is held monthly at least. Latest meeting was held on 2020-06-08. The company conducts the target review monthly.

Management review was conducted once a year, last conducted on 2020-06-04. Report of management review was documented and retained for review during the audit. General manager, factory manager, QA manager attended the opening and closing meetings during the audit. There had 2 decisions raised up.

Food safety and quality culture was in place on 2019-10, such as Establish Food safety Team. The core of our values is " Reproduce green life and care for human health". The factory carried out the food quality culture schedule (No.:TGB6ZH00106) and trained the staff. Paying attention to product safety is the company always adhere to the purpose, from raw material acquisition, production and processing process control to every link of the factory inspection of products. QA of the factory Continuously adhere to quality control and lead by example.

The Feedback processing system (No.TGB6ZH00107)was in place. The type of reporting system included suggestion box, E-mail, online complaints, telephone, visit, etc. And the ways to get employees to understand the system are file study.

GM has committed to provide human resource and financial resource to support BRC standard and maintained product safety and quality management system. Human and financial resources required to produce food safely and in compliance with the requirements of this Standard were accepted.

The main products were exported to America, Europe, Asia and China domestic market and the monitoring system for relevant regulations collection was established and the documents of external origin

were in place. Three approaches to obtain the updated regulation:
1) communicate with its suppliers and customers to know its raw materials and finished products standard;
2) ask the local CIQ for obtaining the new regulation;
3) from web to obtain the new regulation such as China regulations.

The company has a Chinese version original copy of Issue 8 of the Standard at the audit.

This is the company got its fist BRC certificate.
The most senior production/operations managers on site was GM available during opening and closing meeting and available for management interview after the opening meeting.
But Minor NCR1, 1.1.2, No food safety cultural measures schedule.
This is the initial BRC audit, so 1.1.10/1.1.12/1.1.13 N/A.

1.2 Organisational structure, responsibilities and management authority

The current organization chart was available, including those with an impact on product safety, legality and quality. Clear organization structure was established covering all business processes under Global Standard for Food Safety. The organization chart was defined in Food safety and Quality Manual. The company has the sections of quality control, production, sales, logistics, purchase and general office. The responsibilities of the departments and different work positions have been defined. The main positions' deputies in the key positions absence have been documented and approved. The work instructions are issued through hard copies. The on-site interviewed sampled staffs, such as lab staff and packing staffs knew their responsibilities.

Details of non-applicable clauses with justification

Clause/Section reference	Justification
1.1.10	This is the initial BRC audit.
1.1.12	This is the initial BRC audit.
1.1.13	This is the initial BRC audit.

2 The Food Safety Plan – HACCP

HACCP plan established and maintained based on the codex Alimentarius HACCP principles. HACCP plan for its Vitamin B6, valid on 2019-03-01. HACCP plans approved by its GM.
The multi-disciplinary team comprises members including: manager of administration department, production management department, quality management department, purchasing department, sales

department, etc, total 9 members.
Meng Zijian was appointed to HACCP team leader. He had 5 years experience in manufacturing of food products, 5 years experience in quality management and better understanding of HACCP principles and their application. The BRC internal auditor training course for other members were also acceptable and had been trained by CCIC Anhui Co., Ltd. on 2020-04-23 to 24.
Its HACCP plan scope was Vitamin B6, and from raw materials receiving to delivery.
Documented PRPs was in place, including cleaning, pest control, maintenance of equipment and facilities, personnel hygiene, transportation and staff training and others.
But Minor NCR2, 2.1.1, Evidence HACCP knowledge training for team leaders was not provided.

HACCP plans are established according to Codex standard, codes of practice or guidelines and HACCP/BRC Standard, scientific literature for food, and nature of product, hazard analysis, food safety legislation, experimental study and customer requirement.
Relevant information such as scientific literature, historical and known hazard (physical-metal, glass, stone, wood, chemical-residual, heavy metal), code of practice (Codex Alimentarius standard or guideline), legislation and customer requirements were reference for HACCP analysis conducting.

A full description of the product developed includes:
1) Acceptance of raw materials: Activated carbon Pb≤0.001%, Hydrochloric acid AS≤0.0001%.
2) Cyclic reaction: Reaction temperature 85-88℃, Time≥9H.
3) Aryl groove reaction: Time≥9H, Temperature 20-30℃, hydrolysis reaction: Temperature 20-30℃, PH1-2.
4) Metal detection: Fe≤1.2mm, Sus≤2.0mm.

The vitamin B6 flow diagram mainly including: raw material acceptance – formulation - ester acylation – distill - cyclization reaction – Layering – distill – saponification - decarboxylic reaction - Fine fractions - condensation reaction - addition reaction - Aromatic hydrolysis – concentration – crystal - decoloration – dry – smash - packaging – metal detect - storage - warehouse-distribution.No subcontracting.
This flow diagrams were verified on-site by HACCP team members.

Hazard analysis has been completed from raw material, processing to final products, including of biological hazards (e.g. pathogen), chemical hazards (e.g. heavy metal, chemical residue), and physical hazards (e.g. metal, glass). Likely occurrence of hazard and severity of the effects considered fully during the hazard analysis. Decision tree will be used to decision CCP.
A decision tree has been used to assess the hazard controls at each process step and the results are documented.

For its vitamin B6, they used CCP, OPRP and PRP control its all hazards. I challenged them on-site audit.
For its vitamin B6:
CCP1:Acceptance of raw material,
CCP2: Cyclic reaction,
CCP3:Aryl groove, hydrolysis reaction
CCP4: Metal detection
Critical limits for each CCP were also defined:
CL1: Activated carbon Pb≤0.001%, Hydrochloric acid AS≤0.0001%.
CL2: Reaction temperature 85-88℃, Time≥9H.
CL3:Aryl groove reaction: Time≥9H, Temperature 20-30℃, hydrolysis reaction: Temperature 20-30℃, PH1-2.

CL4:Fe≤1.2mm, Sus≤2.0mm.
All critical limits are based on objective data. HACCP validation records are retained on file.
Monitoring system for each CCP is established and implemented.
The procedures for each CCP identify the corrective action to be taken when the limits are exceeded.
Documents and records review find that there is no deviation for the CCP.
Product and process were properly handled and procedure clearly defined in HACCP Plan such as hold and reject. Authorized person was assigned to investigate and release. Validation and verification was conducted annually.
Documents and records reviewed found that there was no deviation for the CCP. The monitoring records of CCPs was available for review.

Procedures of validation and verification to confirm that the HACCP system working effectively (QSP/TGWSS-A-16) was in place.
Last validation and verification for vitamin B6 was respectively carried out on 2020-05. Reports were maintained.
The HACCP records were maintained at least 3 years.

The company operates a formal sign off process for all new products and significant changes and new equipment which includes sign off by the HACCP Team leader to confirm the impact of any changes have been assessed.
HACCP plan review and prerequisite programmes should be carried out conducted annually by factory.

Details of non-applicable clauses with justification

Clause/section reference	Justification
None	

3. Food safety and quality management system

3.1 Food safety and quality manual

The company had established and implemented the food safety and quality management manual (QM/TGWSS-A), Valid on 2020-01-01. The manual (Chinese) described the company‘s commitment to quality and outlined work methods.

All the relevant department and key staff had the latest version Manual, and all the staff could be readily got the printed or electronic quality manual. All the procedure and work instructions were clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by

appropriate staff.

3.2 Document Control

The company established the document control procedure (QSP/TGWSS-A-01), and the procedure clear defined all requirements. Documents have been approved by designed authorized person and distribute to relevant department to ensure the correct version available in place.
The company had its documents register. All documents are readily accessible to relevant staff at all times.
During audit, document observed were legible, unambiguous, and clearly detailed. Reason for changes was recorded in document action request.
The obsolete documents were recalled back to document control department, stamp canceled and disposed.
But Minor NCR3, 3.2.1, Packing workshop metal detection regulation no document number.

3.3 Record completion and maintenance

The company establish the record control procedure (QSP/TGWSS-A-02) was included the records alteration, the electronic records maintenance.
The requirement of collation, review, maintenance, storage and retrieval of records were defined in it.
The product storage period is 2 years. Records shall be kept for 3 years.

The list of quality record was in place. During audit, record observed were legible, unambiguous, and clearly detailed. Reason for changes was recorded in document action request.

3.4 Internal audits

Internal audit procedure specified that internal audit would be conducted per quarter. The audit standard is included BRC 8.0 standard. The audit frequency is based on the risks associated with the activity and previous audit performance. Eg. at least 3 internal audits of production area.

The 2020 internal audit plan was approved. Reviewed the internal audit plan and relevant report, records, the internal audit scope covered the HACCP, PRP and whole Quality and Food Safety System. Internal auditors were trained enough about BRC 8.0 on 2020-04-23 to 24. And the internal auditor certificates were available.
The last internal audit was conducted on 2020-05-21 to 22. Total 3 NCRs were raised in the internal audit, and all the NCRs were found root cause and implemented the CA and verify action in defined time scale.
The internal audit records as following:
1).Internal audit plan.
2).Attendee signature record.
3).Internal audit check list.
4).Corrective action record.

The frequency of GMP inspection is once per month in product areas and plant yard and storage areas. And check records were kept on files. The last inspection was conducted on 2020-06-04.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The company had established a supplier management procedure (QSP/TGWSS-A-05) and purchase management procedure (QSP/TGWSS-A-06) to demonstrate how to purchase product and to ensure product procured conforms to defined requirements. Qualification certificate, quality, delivery performance, price and service were used as evaluation criteria; evaluation method was internal inspection, analysis certificate and questionnaire.
New suppliers are selected covering quality/food safety of product, company profile, certified standard and be approved by authorized person (procurement, QA) prior to adding in supplier list.
The company carried out risk assessment on suppliers every year and divides them into three categories according to the results. QA with internal auditor qualification and procurement conduct annual on-site audit of Category I/II suppliers, and on-site audit of all suppliers within 3 years. They make the on-site review form, including GMP, HACCP, etc., and keep supplier appraisal records of the on-site review form.
The list of qualified suppliers were available.
Supplier risk assessment and review per year as required by procurement management procedures, most recently on 2019-12-1, where supplier site audit and review includes product safety, traceability, HACCP audit, GMP.
Qualified supplier list was in place, total 27 suppliers. On-site verification of suppliers were in the list of qualified suppliers.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Raw material quality standard and inspection method (TGZK105-01) is established and implemented. The parameters for acceptance and frequency of testing are clearly defined in it.
The received materials are verified by authorized person such as QC and store staff prior to receive. The status of passed test material is identified in tag identification for each material for communication with related functions.
The requirements and sampling plan of raw materials and packaging materials were defined. QC staffs were responsible for inspecting organoleptic items for each batch of raw materials, ingredients/additives and packaging materials. COA would be collected. Relevant inspection records were available.
Documented controls for raw and packaging in place to ensure purchased materials conform to purchase specifications and applicable regulatory requirements.

3.5.3 Management of suppliers of services

The management of suppliers of services was defined in purchasing control procedure (QSP/TGSW-14-A). Evaluation of services providers' performance is also done for every service activities. Approved service suppliers were registered in approved supplier list. This included: waste service, pest control service, transportation service and lab service.
Sample:
Transportation provider, Anhui Fengyuan Logistics Co. LTD, contract on 2019-12-26.
Pest control servicer: CCICAnhui, contract on 2019-10.
All the services suppliers were with formal contract, the contract clearly define service expectations and ensure potential food safety risks associated with the service have been addressed.

3.5.4 Management of Out sourced processing

No outsourced processing is utilized.

3.6 Specifications

All materials specifications (HACCP/TGSW-2019-0/A) were in place taking into account relevant CN, GB or other regulars and customer requirements, and cover details of safety parameters (physical, chemical and biological hazard) .
Process specification – net weight, impurity, pressure meter, temperature and time, chemical residues and active component concentration.
Final specifications were in place.
Specification was reviewed per 3 years. Last reviewed on 2019-11.

3.7 Corrective and preventive actions

The company had established corrective actions control procedure (QSP/TGSW-19-A) and preventive actions control procedure (QSP/TGSW-20-A)to ensure investigation of the root cause of non-conformity would be performed and corrective actions would be taken.
QA department is responsible for this issue.
Records review finds that the company takes corrective actions in a timely manner for non-conformities.
No non-compliance is found in this section during the audit.

3.8 Control of non-conforming product

Non-conforming product control procedure (QSP/TGSW-05-A) was established.
All out-of-specification products are clearly identified, labelled and quarantined. All non-conforming products are handled or disposed of according to the requirement.
QA manager is the decision maker of non-conforming products. QA departments is responsible for handling it.
Clear process well understood by staffs that were interviewed during the audit. Storage has one appointed area for storing non-conformity products. Metal detector automatically pop out alarm products. The production site demarcates the non-conforming product storage area, yellow marking line.

3.9 Traceability

The company had established the product identification and traceability control procedure (QSP/TGSW-08-A). Raw material, semi-processed products, most of finial products and waste was traceability card.
The company ensured the traceability of all materials used for its products. And on-site checked its materials and products batch from receiving, process, packing, storage and deliver, and its relevant records recorded them for traceability.
The traceability system was mock test annually. The test was conduct on 2020-05-22 (raw materials trace to final product and final product to raw materials). The mock testing records could be provided that all traceability tests could be achievable within 4 hours (from 14:30-16:00 on 2020-05-22).
Also provide raw material oxalic acid to the finished vitamin B6 traceability records.
A test initiated by the auditor on-site on 2020-06-19 (from 8:00 to 12:00) involved the following.
On-site VB6 products (specification 25KG/box), the quantity is 1250kg, the batch is 2004051, the raw and auxiliary materials storage record, acceptance record, production and processing record, inspection

record, nonconforming product record, etc., can be traced back to the basic realization.
Spot check product inspection report, incoming and outgoing records, shipping records, vehicle records, section operation records, raw and auxiliary materials inspection records, raw and auxiliary materials incoming and outgoing records, etc. are basically traceable. The suppliers' traceability system was ensured and tested regularly.

3.10 Complaint-handling

Customer complaint dispose procedure (QSP/TGWSS-A-20) had described how to handle and record complaints. Sales department collects complaints from clients, and deliver it to QA department. The root of cause should be analyzed by QA. And related person will take action.
The QA department is responsible for the verification work. The verification person is assigned. Customer information feedback records and customer satisfaction survey and analysis report were kept.
Root causes of each problem was investigated.

3.11 Management of incidents, product withdrawal and product recall

The company had a documented emergency control procedure (QSP/TGSW-25-A) and Non-conforming product control procedure (QSP/TGWSS-A-14).The items cover: the equipment broken, water, energy, fire, chemical leakage, malicious contamination or sabotage and disease. Emergency procedure was tested at least annually. Requirements for Covid-19 epidemic prevention and control plan with raw materials was in place, including a leading team and prevention and control measures. There is basically few epidemic in Guzhen City and the production is normal. Raw material packaging materials didn't affected by the Covid-19. In accordance with the requirements of government epidemic prevention, the company shall strictly manage its employees, production process and environment. All employees shall wear masks and visitor are not allowed to enter the production area before May, 2020.

Product recall procedure (QSP/TGWSS-A-15) was in place.
Classifications of product recall:
Class I Recall: This is an emergency situation involving the removal from marketing and distribution channels those products that, because of a deficiency, pose an immediate or long-term serious threat to health or life. In a Class I Recall, top priority must be given to the complete and immediate removal of the recalled products from all levels in the distribution chain all the way down to the consumer level.
Class II Recall: This is a priority situation in which a product deficiency may cause temporary or medically reversible adverse health consequences and where the probability of serious adverse health consequence is remote. An example of such a product is a food product containing Salmonella enteritis. In a Class II Recall, products must be removed from all levels in the distribution chain.
Class III Recall: This is a routine situation in which adverse health consequences of a product deficiency are highly improbable or non-existent. Products are recalled because of adulteration or misbranding not involving a health hazard. In a Class III Recall, products must be removed from the wholesale levels of the distribution chain.
The list of key contacts, e.g. suppliers, customers, was in place. Communication plan was defined in the procedure. The product recall and withdrawal procedures are tested once annually.

The last test was conducted on 2020-05-22 about VB6 19092602 lot 25 kg Box amount 1000Kg.
No recalls happened to date.

Details of non-applicable clauses with justification	
Clause/section reference	**Justification**
3.5.1.5	All raw materials were purchased from the manufacturer.
3.5.1.7	No exceptions situation occurred
3.5.2.3	No live animals receipt.
3.5.4	No outsourced processing is utilized.

4. Site standards

4.1 External standards

The boundary of factory is clearly defined. The building of the factory is in good condition repair and maintained with investments regularly planned. The company was located in Weisi Road, Economic Zone, Guzhen County, Benbu City, Anhui Province, China.

No local activities that would risk product contamination. Consideration has been given to local activities and environment which may have potentially adverse impact, and measures are taken to prevent product contamination. Plant area 16788 square meters . There was 4 main workshop building, spray drying room, inner package room and outer package room). Its lab was located at its office building. The front end of the product is managed according to chemical products. Product production is distributed in different workshops according to different process flow.

4.2 Site security and food defence

Food defense plan (QSP/TGWSS-A-21) and site boundaries have established and clearly defined to prevent access of unauthorized persons to factory.
The company carried food defense hazard analysis and assessment of associated risks although control procedure was available. The security arrangement programmes review in annually, and latest review report was available at 2020-01-01.
Unauthorized person could not be entered production and storage areas. Outer visitors and contractors must be accompanied with related responsibility staff.
Guards were 24 hours patrol in whole plant area, production area and storage area for supervising the product security.
Videos (24 hours, total 90 videos) have been installed around the factory. Gate guard keeps on gate and control visitors.

Visitors should accompanied by the factory's employees. Package materials and finished products kept separately. And chemicals kept in one special room and locked. Procedure was in place to ensure that finished product is held under secure storage and transportation conditions.

4.3 Layout, product flow and segregation

Factory layout plan provided. There is effective segregation in place to minimize the risk of product contamination: raw material dealing workshop, semi-finished product inspection, the refined workshop and packing zone, raw material warehouse, and finished product ambient storage.
The site plans included the access points for personnel, rework, access points for raw materials (including packaging), routes of movement for personnel, routes for the removal of waste and production flow are available. Working space and storage is sufficient to enable operations to be carried out properly under safe hygienic conditions.
The plan of the site which designates areas where product is at different levels of risk from contamination is defined in prerequisite programmes.
For its products, no high risk/high care/ ambient high-care area defined.
No temporary structures.

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

The fabrication of the site, buildings and facilities are suitable.
Walls were constructed of concrete and armor plate. Ceiling and walls were cleaned.
Floors were surfaced with concrete (synthesis workshop and spray dring room). Drainage is sited, designed and maintained to minimize risk of product contamination.
Appropriately designed and maintained in work condition to prevent contamination.
Verified on site, floors were designed to meet demands of the process. And drainages were designed and maintained to minimize risk of product contamination. No stagnant water was observed. Verified on site, ceiling of inner packing room were designed and maintained to prevent contamination.
Doors were in work condition and close fitting to prevent pest ingress.
Windows were designed well. The windows in process and warehouse were shielded with film to avoid the contamination with the food when the windows were broken.
Sufficient lighting was observed during assessment in all working environment. Bulbs and strip lights, including those on electric fly-killer devices were adequately protected.
Fans and air conditionings were used in processing area, they were maintained.

4.5 Utilities – water, ice, air and other gases

The underground water supplies used for equipment or plant cleaning and in the manufacture for products.
An up-to-date schematic diagram is available of the water distribution system on site.
The water testing report from Bengbu Institute of Product Quality Supervision and Inspection Research(CMA：181200111277), issue date on 2020-04-09, total 24 testing items including TPC, Coli form, As, Cr, Pb, Hg, Ph, visual matter, the testing result met GB5749, the testing was conducted annually, report refers to C2020-S0178).
Water testing of the water would be conducted once per month by internal lab, the testing items including nitrate, nitrite, non-volatile, heavy metals.
Ice is not used for processing.

4.6 Equipment

Equipment control procedure (TGB6-SC-017-01) was established. The main equipments include reactor, distillation tower, fermentation tank , drying tower, packaging machine, gold detector. The equipment was suitably designed for the intended purpose. The machines made from stainless steel and plastic.
Equipment is positioned well to facilitate cleaning and service.
Equipments have been specified before purchase, and tested and commissioned prior to use.
All of the machines are located in the workshop and in general maintained under routine maintenance systems.

4.7 Maintenance

Equipment management procedure (TGB6-SC-017-01), maintenance plan was in place and implemented on 2019-12-31. The tool and machinery parts had account before and after maintenance. The cleaning work must be took place after maintenance. Sample equipment maintenance records by plan, relevant records were available. Maintain room was separated from working area and storage area.
No temporary repairs were found on site. The maintenance work must be scheduled outside production hours.
The lubricating grease was Exxonmobil Oil Corporation, it was available. The register information NSF H1 136449.
But Minor NCR4, 4.7.2, There are maintenance tools in the inner packing workshop pulverizer.

4.8 Staff facilities

Protective clothing, footwear, hair net and mask were provided for all employees including visitor.
Changing facilities for staff, visitors were site in the factory. They were kept in clean, dry and normal condition. Personal items are stored in small closet in changing room. No food is permitted in production and store area. Food is provided in mess outside production area and store area.
There was a procedure to verify cleanliness of clothing before enter production area daily.
Including liquid soap, and 75 percent alcohol for hands, hand dryer.
Outdoor clothing and other personal items stored room provided well.
Hand washing stations are provided at the entrances of production areas. Hand free operation, liquid soap, located hand dryers.
Toilets are adequately segregated and do not open directly into storage. The hand cleaning chemical and-drying devices are provided for the toilet for operators in processing areas.
Rule for changing protective clothing before leaving the production line for toilet and canteen was in place.
Smoking area and waste basin were provided outside production area. No evidence of smoking was observed out of designated area.
One canteen, located at outside the factory, was segregated in a special buildings, and controlled the hygienic state of area and checked by QA team.
But Minor NCR5, 4.8.4, No sign of hand sanitizer, no hot water.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

SSOP was established to be used as guidelines for preventing chemical and physical contamination risk.
A chemical control procedure （PRP/TGWSS-A）was in place managing the using, storage and handling of non-food chemicals. Main chemicals are lab reagents, 84 disinfectant, liquid soap, lubricants, alcohol, etc.
The chemicals were stored in separated and locked room, relevant MSDSs, testing reports and chemicals list was in place.
The designated staffs are responsible for storage, mixed, and use. Records were kept and specified the responsible staffs as well as the date and the concentration.
Approved chemical list was available for review.
On-site audit found labelling was clearly.
But Minor NCR6, 4.9.1.1, the inner packing workshop discharging equipment stores any marking lubricating oil.

4.9.2 Metal control

Tool and metal products control procedures (QSP/TGWSS-A-28) was established for implementing, and there was daily inspection record for damage and the investigation of any lost items.
Staple and snap off blade are not allowed to use and take into production area and on packaging materials.
But minor NCR7, 4.9.2.1, a knife was found in the inner packing workshop; a wire ball was found in the cleaning room.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass and fragile control procedures (QSP/TGWSS-A-23) was established throughout the processing, packing and storage area. All breakage incidences shall be investigated and documented including: object, location, possible source, root cause, corrective and preventative actions, and disposition of any affected product or materials.
List and lay out of glass and hard plastic equipment are detailed in place.
Daily inspection was in place for all areas where risk for product contamination. Glass and hard plastic record was maintained and verified.
Documented procedures are in place detailing the actions to be taken in case of breakage of glass are in place. The measures include the following: identifying the scope of goods to be isolated; Authorized personnel clearing the production area and releasing the production line for the continued production.
Interviewed staff, they showed competency of handling process.
But minor NCR8, 4.9.3.1, Inner packing workshop pulverizer wrapped with transparent tape.

4.9.4 Products packed into glass or other brittle containers

No fragile packaging, all in large plastic bags.

4.9.5 Wood

No wooden pallets and wooden tools in workshops are present in open product areas when our visit.

4.9.6 Other physical contaminants

No other physical contaminants found on-site.

4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
Base on risk assessment, foreign body control measures included filters and metal detector. As policy, the detected foreign body need to be investigated and analysis to reduce occurrence contamination of foreign body. The hazard analysis of foreign material was detailed in HACCP plan, Metal detection equipment is used. Fe was 1.2 mm, SUS was 2.0 mm. Metal detection equipment was test half an hour and kept the records.
4.10.2 Filters and sieves
Bag filters with 60 mesh were used between reaction liquid transport. Pass pressure check every shift and clean the filter-bag regularly. The effective verified by the finished products inspection.
4.10.3 Metal detectors and X-ray equipment
A risk assessment is available to justify the reasons why they are not required, it was included the complaint levels analysis, on site metal control policy and product inspection before filling in. Metal detection equipment is used. Fe was 1.2 mm, SUS was 2.0 mm. Metal detection equipment was test half an hour and kept the records.
4.10.4 Magnets
No magnet used in its processing line.
4.10.5 Optical sorting equipment
No used optical sorting equipment.
4.10.6 Container cleanliness – glass jars, cans and other rigid containers
No used glass jars, cans and other rigid containers.
4.11 Housekeeping and hygiene
Housekeeping and hygiene systems are performed by internal employees who are trained at least annually.The cleaning frequency is shift after finishing work. The cleaning items are defined and implemented including tools, equipment, surface of the contact food, environment. Verification of the cleaning and disinfection by visually check and swabbing testing is conducted by QC. Swabbing testing against rotating schedule sent to laboratory for testing TPC by the contracted Lab. During audit on site, the equipment, tools, the surface of the contract food, floor and wall are in the cleaning manner.
4.11.7 Cleaning in place (CIP)
No CIP facility is used.
4.11.8 Environmental monitoring

Environment monitoring plan (TGZK) was in place and was carried according to the programme.
Total bacterial account of food contact surface, instrument, work table, work clothes and equipment was in place. Commissioned Fengyuan gelatin for detection. Provide "clean area surface microbial test record" and microbial verification summary.
Check the total number of bacteria and coliform bacteria of food contact surfaces such as work table, staff hand, equipment and so on in packing workshop every month.

4.12 Waste

Waste Management Rule was in place. The waste would be removed by local agency, disposed by subcontracted party, protocol was provided. No accumulation of waste in processing area was observed during the audit.
The production waste and live waste would be moved from the factory once a day. External waste collection container is clean in time.
No trademarked waste on-site.
Hazardous waste entrusted to Suzhou Haichuang Environmental Technology Co., Ltd. to dispose of 2019-9-10 signed a contract .

4.13 Management of surplus food and products for animal feed

No products of downgraded for animal feed.

4.14 Pest management

A preventive pest control programme is maintained covering all areas of the site to minimise pest infestation, refers to QSP/TGWSS-A-24
Pest controls were done part by third party, such as CCIC Anhui Co., Ltd authorized by the regulatory. The qualified certificates and the training certificates of the pest operator are retained, such as Xu Xiaojiang (170106102640862) and Jiang Lin (1701061026400863)
A map of pest control facilities is in place. Mouse control is accomplished by locating traps along the perimeters of buildings and inspected daily. No use pesticide in the facility.
An in-depth, documented pest control survey is undertaken annually, factory use the survey results including fly and rodent, these records are kept on file for analysis its density and control measures, once the density is high and related equipment and stations are fixed. The last in-depth inspection was conducted on 2020-06-10. The trend analysis was conducted on 2020-06-10.
Employees understood the signs of pest activity and are aware of the need to report any evidence of pest activity to a designated manager.
But minor NCR9, 4.14.8, There is a mouse on the stick mouse board at the door of the warehouse, and the dead body of flying insects adhered on the fly-killing lamp is many, and it is not cleaned in time.

4.15 Storage facilities
Product transport and storage control procedure has been established and implemented. The finished products were stored in the ambient storage separately and identified clearly. All facilities used for the storage and 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. Procedures to maintain product safety and quality during storage, loading and transportation developed on the basis of risk assessment and implemented accordingly. No atmosphere storage and no outside storage was used.
4.16 Dispatch and transport
Product transport and storage control procedure has been established. Transport requirements with the logistics company were clearly defined in the contract. Raw material and packaging transport arranged by suppliers. Clear checking records were maintained of dispatch and receipt of goods and materials to ensure the traceability.Documented maintenance and hygiene procedures were maintained for all vehicles and equipment used for loading and unloading.

Details of non-applicable clauses with justification

Clause/section reference	Justification
4.9.4	No fragile packaging
4.9.5	No wood on-site.
4.9.6	No other physical contaminants found on-site.
4.10.4	No used magnets
4.10.5	No used optical sorting equipment.
4.10.6	No used glass jars, cans and other rigid containers.
4.11.7	No CIP facility is used.
4.12.3	No trademarked waste on-site
4.13.3	No animal feed products

4.15.4	No atmosphere storage.
4.15.5	No outside storage was used.

5. Product control

5.1 Product design/development

The product design and development control procedure (QSP/TGWSS-A-31) was established. The company collecting legal requirements, ingredients requirements, technical requirements, equipment requirements before develop VB6. Also, the company established HACCP plan for this product.
There were no new product developments other than VB6.
Shelf life was established according to relevant standards. The shelf life verification experiment is being done. Related records were provided per 6 months.
But minor NCR10, 5.14, Failure to provide a scientific basis for 24 months of product shelf life.

5.2 Product labelling

Product labelling procedure (QFP/TGSWKJ-2020-A-25) was in place. Correction of labelling was verified against destination country by HACCP team.
The product formulation and production process is fully validated to meet the stated claim.
The label information was controlled.
No customer or third party responsibility for label information.

5.3 Management of allergens

Allergen procedure (QSP/TGWSS-A-29) based on risk assessment was established and implemented.
The allergen ingredient is reviewed and there is no allergen matters during the production processing.
Documented procedure is established to prevent allergen cross-contamination, it also included the restriction on food brought onto site by staff, visitors, and contractors and for catering purposes.
The use of rework is documented, it is not exist allergen cross-contamination.
In the raw material storage, products were marked clearly.
All relative ingredients are printed on the label of the product.
No claim was made regarding the suitability of the products for allergy sensitivity sufferers. Allergen training has been done.

5.4 Product authenticity, claims and chain of custody

The documented product authenticity control procedure (QSP/TGWSS-A-26) for on all raw materials to assess the potential risk of adulteration or substitution. This was taken into account: historical evidence of substitution or adulteration, economic factors which may make adulteration or substitution more attractive, ease of access to raw materials through the supply chain, sophistication of routine testing to identify adulterants and nature of the raw material. The assessment was conducted for new BRC requirements.
All raw materials were not identified as being at particular risk of adulteration or substitution appropriate

assurance.
Full chain traceability checks to source are provided.
They will keep updated with developing and emerging threats on materials by supplier survey, industry feedback and new information.
No organic and Kosher claims are made. Company FAMI-QS Certification

5.5 Product packaging

Certificates and analysis reports are available for product package which directly contact with food. The relevant certificates and reports were available. All packaging items complied with relevant legislative requirements such as Chinese National Standard and showed suitably for use.
The relative package materials kept in special storage, the inner package materials and out package materials are also kept separately. Those are stored on the plate and with good protection.
No product liners used.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

The inspection management system (TGZK) is in place.
The physical and taste of the finished product was inspected by QC per batch. The finished product inspection and testing record is in place.
The lab of the company is separated from the production workshop and warehouse, visitor can't access until visitor is permitted, there is no potential hazard from lab.
The testing result was reviewed.
A systems of recording and review are formalised and included evidence of actions taken on identified trends, or where unsatisfactory results are recorded.
The use of graphs of test results provides a good method of identifying trends and anomalous results.
Shelf life 24 months is assigned in line with historical test results for different package.
An annual verification throughout life is made to confirm end of life micro counts and taste inspection.
The documented instruction is in place.

5.6.2 Laboratory testing

Internal Lab was present for regular analysis and sometimes sub-contracted to External Laboratories. The laboratory includes physical and chemical test room with HPCL, oven, balance, UV spectrophotometer, gas chromatograph, etc., not located in the production/storage areas. The analysts have received the training and competent to carry out the analysis required.
The lab instruments are calibrated. The current calibration certificates were provided.
But minor NCR11, 5.6.2.4, can not provide evidence of laboratory capability comparison.

5.7 Product release

Product release procedure(TGZK130)is established and implemented to ensure that finished product is released from its control until all production checks by QA when the products have been completed and tested. Positive release for the products and authorized by QA. QA report is seen and results are compliance with the specification. Finished products normally approved by QA manager before the releasing.
5.8 Pet Food
No pet food
Details of non-applicable clauses with justification

Clause/section reference	Justification
5.2.4	No customers or nominated third party responsible for label information
5.3.7	No claims made regarding suitability for allergy or food sensitivity sufferers
5.4.4	No claims made on finished products which are dependent on a status of the raw material
5.4.5	No claims made about the methods of production
5.4.6	No claims made
5.5.2	No product liners used
5.8	No pet food

6. Process control

6.1 Control of operations

The company established process control parameters related to food safety and quality.
Operating procedure was established and implemented in order to control all parameters.
Process control parameters were defined for each step, e.g. receiving, process control, weight control, packing, storage.
All critical control points and quality control points were regularly monitored as defined plan. Production supervisors were assigned to verify. Staff who responsible for monitoring process parameters demonstrated their competence from interviewing during on-site assessment. Training records were maintained.
The procedure to ensure product safety prior to release covering equipment failure and process deviation was established. Details were defined in HACCP Plan. Corrective action records were maintained in case of process deviations.
In cases of equipment failure or deviation from process or specification, the company have defined procedures in place to ensure that the product is safe prior to its release.

6.2 Labelling and pack control

Product release procedure(TGZKSP-03-02)is established. The visual checking was done before the production start-up, the checking items are as follows: status of food contract surface, the hygiene of operation environment, and the remaining issues from last production shift. All the materials and packaging were cleaned out before next shift or next products.
No on-line vision equipment were used to checking product label and printing.
For each products, operator checked the label information or the batch information, and its packing records showed that the company checked again before the packing.
Documented checks are carried out on the production line before production commences would be ensure that systems are correctly set and running. The changeover was verified by auditor during the on-site audit.

6.3 Quantity, weight, volume and number control

The weight checking was established, it was carried out in packing line, every container need to select to test the weight. The type of weight marking was minimum weight.
No bulk quantity product for this product.

6.4 Calibration and control of measuring and monitoring devices

Calibration Control Procedure (QSP/TGWSS-A-07) for Measuring and Monitoring Devices and measuring equipment list were available.
Measuring equipment related to CCPs monitoring, critical to quality attribute concerning with process control are identified in calibration list and calibration plan.
Measuring and monitoring devices were calibrated at least annually by competent authority. The verification certificates for the measuring devices are collected and reviewed, For example:
1) Gas chromatograph, No. GC-2014, Verification Date 2020-5-12.
2) Pressure gage, No.Y100, Verification Date 2019-11-01.
3) Electronic balance, No. AL204, Verification Date 2020-4-23.
4) Acidity meter, No. FE20, Verification Date 2020-5-8.

5) Liquid chromatograph, No. 5100P, Verification Date 2020-5-10.
They were calibrated by Bengbu Institute of Measurement and Testing.
But minor NCR12, 6.4.3, Summary report of traceability and material balance not provided.

Details of non-applicable clauses with justification

Clause/section reference	Justification
6.2.4	No on-line vision equipment used to check product labels and printing
6.3.2	No bulk quantities packed

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

Training management procedure (TGB6ZH00105) was in place.HR department to manage the company's personnel competences and training activities. Established the job specification, specify the competences requirements of personnel in different positions, and make overall assessment of the competences of personnel in relevant positions. And the conclusions are satisfied.
All new staff should be trained on working instructions and personal hygiene requirements before commence to work, all visitors were trained on personal hygiene requirements before enter into processing areas.
Training plan of 2020 was established on 2019-12-25.
For example, food safety training conducted on 2020-1-20, allergen conducted on 2019-6-5, confidential reporting system conducted on 2020-8-20, food protection conducted on 2020-5-22, key positions conducted on 2020-5-25. The company reviewed training effectiveness after training each time.
Competencies of its staff were reviewed annually.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Personal hygiene control procedures (QSP/TGWSS-A-09) was established and implemented defined in its PRP.
Compliance with the requirement was daily checked and recorded. False nail was not allowed.
Fingernails must be kept short and unvarnished. Jewellery, watches, ring, perfume were not allowed to use in production area. This company regulation was informed to visitor and contractor before entering to production area which checked by production team leader prior to enter.
Smoking, eating, and drinking were allowed in designated areas only.
Hand washing facilities including liquid soap, hand dryer, alcohol disinfection.

Regulations for the management of drying workshop explain how to manage plaster. If wounded, use the plaster. The plasters are suitable. The plaster use record was in place and kept the record. And on site the plaster can be tested by its metal detector.
Personal medicines were allowed to be kept in locker only.

7.3 Medical screening

Documented personal hygiene requirement (PRP/TGWSS-A) was defined and implemented for all staff and visitors.

Medical checking including stool examination was provided once a year for existing staff and health questionnaire was provided for visitors and subcontractors. Refer to procedure.
The company requires that all staffs receive health examination by Guzhen County Hospital. 10 sampled staffs' health examination certificates were valid, such as Wang Hong(e0010002885), Wang Yan(e0010002890), Ding Wei(e0010002886) and Hu Tao(e0010002889).
During the audit, the company was required the BRC auditor to complete a health questionnaire before come into process areas.
In case of infectious disease, staff was moved to work in low risk area and re-screening was required.

7.4 Protective clothing: employees or visitors to production areas

Operating procedure for cleaning and disinfection of clean area of dry workshop (QSP/TGWSS-A-09) was in place. The company provided protective clothing for staff, visitor before entering process area.
Staff's protective clothing such as cap must be removed and stored at designated area before leaving.
Personal hygiene procedure was communicated to employees and visitors regarding wearing, changing and removal area especially before entering toilets, canteen use and no smoking policy. Cleaned and unclean protective clothing were segregated in changing room.
Work shoes have been provided for staff while working in process and storage area.
Footwear was allowed only within factory environment.
Suitable protective clothing provided for its workers, normally, every worker has two suits.
A laundering room located at dry workshop building, one auto-washing machine was in it. Each staff was required to washing its protective clothing. Frequency is once per shift.
Gloves are used in its processing area. Replace in time and check before working and after working. A disposable type glove is suitable on site,.
White colour clothing used in its packing area. Dark blue colour used in other processing area and its maintenance staff.

Details of non-applicable clauses with justification

Clause/section reference	Justification
7.4.7	No items of personal protective clothing that are not suitable for laundering are provided.

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones

8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

8.2 Building fabric in high-risk and high-care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

8.3 Maintenance in high-risk and high-care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

8.4 Staff facilities for high-risk and high-care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

8.5 Housekeeping and hygiene in the high-risk high-care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

8.6 Waste/Waste disposal in high risk, high care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

8.7 Protective clothing in the high-risk high-care zones

N/A.No high-risk, high-care and ambient high-care production risk zones.

Details of non-applicable clauses with justification

Clause/section reference	Justification
8.1	No high-risk, high-care and ambient high-care production risk zones.

8.2	No high-risk, high-care and ambient high-care production risk zones.
8.3	No high-risk, high-care and ambient high-care production risk zones.
8.4	No high-risk, high-care and ambient high-care production risk zones.
8.5	No high-risk, high-care and ambient high-care production risk zones.
8.6	No high-risk, high-care and ambient high-care production risk zones.
8.7	No high-risk, high-care and ambient high-care production risk zones.

9 - Traded Products

9.1 Approval and performance monitoring of manufacturers/packers of traded food products

N/A. No traded products

9.2 Specifications

N/A. No traded products

9.3 Product inspection and laboratory testing

N/A. No traded products

9.4 Product legality

N/A. No traded products

9.5 Traceability

N/A. No traded products