



Audit Report

Global Standard for Storage and Distribution Issue 3: August 2016

1. Audit Summary			
Company name	Brakes	BRC Site Code	N/A
Site name	Head Office - Ashford		
Scope of audit	The management systems for wholesale (branded and own brand), storage and distribution of frozen, chilled and ambient food products and non-foods products at depots within the group.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Start Date	2018-07-30		
Audit Finish Date	2018-07-30		
Re-audit due date	2019-07-30		

2. Audit Results					
Audit result	CERTIFICATED	Audit grade	Choose an item	Audit type	Announced
Previous audit grade	No Grade	Previous audit date	2017-07-11		

Number of non-conformities	Critical	0
	Major	0
	Minor	0

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3. Product Characteristics

	StorageDistribution
Product categories	01 - Chilled and Frozen Food 02 - Ambient Food 03 - Packaging and packing materials 04 - Consumer Products
Activities	01 - Storage 02 - Distribution 04 – Wholesale Module

4. Company Details

Address	Enterprise House Eureka Business Park Ashford Kent TN25 4AG		
Country	UK	Site Telephone Number	01233 206002
Commercial representative Name	Commercial representative Name	Email	Email
Technical representative Name	Rose Smith	Email	Rose.smith@brake.co.uk

Additional Locations

Site Name	Address	Activities
Brakes – Aylesford	Brakes (Aylesford) Unit A Riverside Business Park New Hythe Lane Aylesford Kent ME20 6SW	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Bodelwyddan	Brakes (Bodelwyddan) Royal Welch Avenue Bodelwyddan Denbighshire LL18 5TQ	01 - Storage 02 - Distribution

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Brakes – Bodmin Cornwall	Brakes (Bodmin Cornwall) Victoria Business Park Roche Cornwall United Kingdom PL26 8LX	01 - Storage 02 - Distribution
Brakes – Brighton	Brakes (Brighton) Crowhurst Road Hollingbury Industrial Estate Brighton East Sussex BN1 8AF	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Bristol	Brakes (Bristol) Portbury Way, Royal Portbury Dock Bristol BS20 7XN	01 - Storage 02 - Distribution
Brakes - Coventry	Brakes (Coventry) Richardson Way Cross Point Business Park Coventry CV2 2TP	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Dundee	Brakes (Dundee) Riverside Distribution Centre Wright Avenue Dundee DD2 1UD	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Durham	Brakes (Durham) Bowburn North Industrial Estate Bowburn Durham DH6 5PF	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Eastleigh	Brakes (Eastleigh) Parham Drive Boyatt Wood Industrial Estate Eastleigh Hampshire SO50 4NU	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Grantham	Brakes (Grantham) Palmer Road, A1 Triangle Gonerby Moor Grantham Lincolnshire NG32 2BW	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Harlow	Brakes (Harlow) Flex Meadow Harlow Essex CM19 5TJ	01 - Chilled and Frozen Food 02 - Ambient Food 03 - Packaging and packing materials 04 - Consumer Products
Brakes – Hemsworth	Brakes (Hemsworth) Hoyle Mill Road Kinsey Near Pontefract	01 - Storage 02 - Distribution 04 - Wholesale Module

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	West Yorkshire WF9 5JB	
Brakes – Inverness	Brakes (Inverness) 17 Seafeld Road Inverness Scotland IV1 1SG	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Montgomery	Brakes (Montgomery) Station Yard Montgomery Powys SY15 6HB	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Motherwell Scotland	Brakes (Motherwell Scotland) Edinburgh Road Motherwell North Lanarkshire Scotland ML1 5SY	01 - Storage 02 - Distribution
Brakes – O’Kane Foodservice	Brakes (O’Kane Foodservice) 221 Hillhall Road Lisburn County Antrim BT27 5JQ	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes – Peterlee	Brakes (Peterlee) Unit 5 Burdon Drive North West Ind Est Peterlee SR8 2JH	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Portburys	Brakes (Portburys) Portbury Way Royal Portbury Dock Bristol BS20 7XN	01 - Storage 02 - Distribution
Brakes – Premier Park	Brakes (Premier Park) Premier Park Road Park Royal London NW10 7NZ	01 - Storage 02 - Distribution 09 - Contracted Services Contract Containers
Brakes - Reading	Brakes (Reading) Unit 24 Suttons Business Park Earley Reading Berkshire RG6 1AZ	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Thetford	Brakes (Thetford) Units 1-4 Baird Way Fisson Way Industrial Estate Thetford Norfolk IP24 1JA	01 - Storage 02 - Distribution 04 - Wholesale Module
Brakes - Warrington	Brakes (Warrington) Unit 3 Lockheed Road, Burtonwood & Westbrook,	01 - Storage 02 - Distribution 04 - Wholesale Module

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	Warrington, Cheshire WA5 4AH	
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5. Company Profile

Plant size (metres square)	Choose an item	No. of employees	Choose an item	No. of Vehicles	Choose an item
Subcontracted processes	No				
Other certificates held	Organic; Red Tractor; MSC				
Regions exported to	None				
Major changes since last BRC audit	None				
<p>Company Description</p> <p>The company distributes food products throughout the UK, and Europe to the catering, wholesale and industrial sectors of the food industry. Annual turnover is in excess of £3 billion and the company has approximately a 20% share of the food service sector. The Head Office in Ashford employs around 600 staff and oversees several businesses including food service, logistics and grocery. M & J Seafood and Pauley's now belong to a separate business entity outside the scope of this assessment. Brakes branded, customer-branded and manufacturer branded products are distributed out of 34 depots. The company also holds accreditation to ISO 14001. The technical resources for the business were evaluated and included supplier approval, purchasing and support functions. The company operates Assure, a technical data base which allows the company improved management of suppliers, specifications and marketing activities. The business handles approximately 4000 Own Brand SKUs using circa 750 suppliers – total number of lines is 15,000.</p>					

6. Audit Duration Details

On-site duration	6 man hours	Duration auditing the site and vehicles	0 man hours
Reasons for deviation from typical or expected audit duration	Head office audit. Well established QMS and head office activities only.		
Next audit type selected	Announced		
Audit frequency	12 months		

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Audit Duration per day

Audit Days	Audit Start Time	Audit Finish Time
1	08:30	14:30

	Auditor <u>(s)</u> number(s)	Names and roles of others
Auditor Number	207207	John Howells – Lead Auditor
Second Auditor Number	N/A	

Key Personnel

Name/Job Title	Present at Audit (x)			
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.8)	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Barry Mirhabib – Head of Technical	X	X	X	X
Rose Smith – Dist Quality Manager	X	X	X	X
Gerry Thomas – Technical Director				X

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Non-Conformity Summary Sheet

Critical

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Anticipated re-audit date

Major

No.	Requirement ref.	Detail of Non-Conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided Document Photograph Visit/Other	Date reviewed	Reviewed by

Minor

No.	Requirement ref.	Detail of Non-Conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided Document Photograph Visit/Other	Date reviewed	Reviewed by

Comments on non-conformities

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Detailed Audit Report

1. Senior Management Commitment

The company has a documented Product Safety and Quality Policy signed by the Group Chief Executive Officer. The Quality Manual is managed centrally by Rose Smith and made available to each depot via the company's intranet system with email notification of changes made.

Central Head Office and supply base provide legal and technical information to the Group and Brakes Group are members of Campden BRI, Leatherhead RA, and BFFF. Nigel Browne sits on BFFF committees and Barry Mirhabib on Campden Technical Panels with specialist reference to Microbiological Safety of Foods.

Quality Objectives have been determined (per depot) and include a commitment to reduce customer complaints. These are documented by Nigel Browne on a monthly report.

Management Reviews are conducted centrally on an annual basis covering the Quality Management System. The agenda for the meeting covers as a minimum the requirements of the BRC S&D Standard - Matters arising, Risk control dashboard, Quality Management Systems, Technical scorecard, Head Office audit, External audits, Customer complaints, Depot audits, Enforcement body visits, Legislation and Product Safety. All senior management attend the meetings.

There is a management structure which facilitates clear communication channels to senior management and involves – Directors – Head of Distribution Quality – Depot Quality Managers – Depot Management Representatives.

Individual sites are approved by relevant local authorities.

There is an organisational structure chart available for the UK Technical Team which details reporting lines and cover for absence of key staff. Organograms are also in place to show the relationship of the Technical Team with the rest of the management. Individual Depots have separate charts.

Employees are made aware of their responsibilities through Job Descriptions which were reviewed during this Head Office Assessment.

The company has a QPS, 6QLFC8/22.06.17 which is signed by Ton Christiaarse, UK CEO, 22.06.17 which is displayed in the head office reception and at each depot.

The company has set a number of quality objectives which are applicable to each depot and include:

- Temperature complaints – target <30 complaints per million units (CMPU)
- Damages – target <300 complaints per million units (CMPU)
- Maintain certification to the BRC Global Standard for Storage & Distribution

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These are monitored through monthly meetings with information provided for depot and reported to the individual depots through the DQM's. Reviewed minutes from Period 12 (covering the end of the financial year to June 2018) with several depots outside of the target for temperature complaints due to the extreme weather.

The last senior management review was conducted 30.01.18 @ Harlow with an agenda meeting the requirements of the standard: minutes of previous meeting (none outstanding); product safety & quality policy; risk management; QMS (37 amends in the past 12 months); technical scorecard (slight amends to 2017, good improvement over 2017; compliance rating 50% of A's are gold and 50% silver to differentiate scope for improvement; complaints, damages +3% & temp -1% for 2017); head office audits (N/C's closed off, BRC audits – all depots passed mostly with AA or A grade); enforcement body activity (6 formal referrals, continues at low levels); operational changes & developments; resource requirements; MSC; AOB.

The results from the senior management review are cascaded to each depot who then keep them on file for reference and are audited through the DQM audits for each depot.

The company has both electronic and hard copies of the standard which were available to the auditor during the assessment. The head office is registered with a Primary Authority agreement with Kent County Council.

There is an organisational structure in place issued June 2018 for the UK Technical Team which was shown as a printed version and all other functions are held on the Intranet and divided into the individual departments. Each depot has their own depot level structure with dotted line reporting into head office functions.

Job descriptions are available and reviewed for:

- Nigel Browne – head of distribution quality
- Rose Smith – distribution quality manager
- Mercedes Extremera – technical manager (Ireland)
-

Technical Department & Site Deputisation 8TWR3F, issued 01.03.17 statement covers the absence of key cover. The company are members of various organisations to maintain up to date knowledge of legislation and scientific developments such as BFFF, Campden BRI, Chilled Foods Federation and the IGD (Institute of Grocery Distribution).

N/A Clauses

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2. Hazard and Risk Analysis

The company has carried out a HACCP study in accordance with the requirements of Codex Alimentarius. The study was undertaken at head office by a multidisciplinary team, led by the Head of Distribution Quality with team members, Head of Technical Services and Food safety, Distribution Quality Managers and co-opted Depot based experts as required. All team members have undergone suitable training and records were seen during this assessment.

The study is generic for product supply and for ambient, chilled and frozen storage and transportation. It was developed initially in 1998 and is reviewed for effectiveness on an annual basis with focus on pre-requisite controls and key temperature measurement CCP's. The HACCP plan is scoped to include supplier selection and monitoring through delivery, storage, collation and shipping and also includes product returns. The HACCP study is issued centrally to each of the depots all of which have at least one HACCP trained team member. Physical, chemical and microbiological hazards have been considered in the risk assessment as have those related to allergens.

A master process flow has been agreed by the team and Critical Control Points have been identified using a decision tree and likelihood versus risk assessment. The risk assessment has highlighted a number of pre-requisites which are documented along with their controls, responsibilities and records.

Pre-requisites include supplier approval, frozen product temperature controls, environmental temperature controls, cleaning, waste management, pest control, calibration and traceability. The assessment has identified three CCP's which are applicable at depots according to product.

The HACCP study highlights records, procedures and responsibilities for the management of each CCP. Validation of critical control points is based upon legislative requirements for storage of food and Brakes own Standard.

HACCP review meetings are carried out on an annual basis with records of the last review seen to be comprehensive.

The HACCP plan has been conducted in conjunction with the principles of the Codex Alimentarius and Distribution HACCP Statement 6QL8FD/30.03.17 is a brief outline of the HACCP system.

Pre-requisite plan 8K6JHP/25.07.18 covers:

- Backhauls / Calibration / Cleaning / Contamination control / Non-conforming product / Personal hygiene / Pest control / Planned maintenance / Storage controls (exc. Temperature) / Supplier approval & product purchasing / Temperature control / goods in, storage & distribution) / Traceability & quality / Training (staff) / Waste management control / Allergen management

The Distribution HACCP Team consists of:

- Nigel Browne – head of distribution – team leader – RSPH, Certificate in Essential HACCP Practise issued 1998
- Barry Mirhabib – head of technical services, nutrition & product safety
- Gillian Wallace-King – head of product technology

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- Sarah Marshall – distribution quality manager Grantham
- Wendy Whitehead – distribution quality manager Hemsworth – IRCA Practical Auditing of Quality Management Systems according to ISO 9001:2000 & ISO 19011:2002 – issued 2007
- Rose Smith – distribution quality manager Enterprise House
- Elizabeth Castleman – distribution quality manager Portbury – RIPH Foundation Certificate in HACCP Principles – issued 2006
- Mercedes Extremera – technical manager Ireland
- Distribution Centre Managers

The scope of the HACCP covers the storage and distribution of all ambient, chilled frozen and associated non-food items and packaging received from suppliers and delivered to customers, with the BRC certification covering Chilled & Frozen Food, Ambient Food and Consumer Products & Packaging Flow Diagram 4TBN94/25.07.8 which is signed by each individual depot.

The associated hazards have been identified within the pre-requisite management controls 8K6HJP/25.07.18 as being Physical: Chemical: Microbiological: Allergens, with the control plan showing all controls for each stage of the operation in place.

A decision tree 8K6K6Y/27.07.11 has been used to identify 2 x CCP's:

- CCP1 - Goods In temperature of Chilled Products – Supplier and Haulier Vehicle Air Temperature Target 5°C, Chilled Offal – maximum 3°C, Chilled Minced Meat – maximum 2°C. Other Animal Origin Chilled Products – maximum 4°C, Other Chilled Products Maximum 5°C and Brakes Logistics Customers to their specification.
- CCP2 – Goods in storage of chilled products – Chilled Meat Chambers – 0-2°C, Other Chilled Product Stores 1-4°C (products handled at maximum 5°C for up to 2 hours).

Risk analysis BK6JMK/18.05.18 covers the associated hazards and is listed in tabular format including the control measures for each process step. The risk analysis is based around a Severity V's Likelihood scoring matrix.

Last full HACCP review was conducted 19.04.18 and included all team members and covers:

- Previous minutes / Frozen / Quick Frozen Temperatures / Chemicals / TACCP / Segregation / Depot transfer temperatures / Offal & mince / Vulnerable products / HACCP team / Clause 5.2.1 / Degree minutes / SWMS (Sysco Warehouse Management System) / Document Changes – CCP 3 was removed as is now covered by the pre-requisite programme

Next meeting scheduled for 18.07.17

N/A Clauses

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3. Quality Management

Quality Systems

There is a documented quality manual which meets the requirements of the standard and includes policies and procedures. The quality manual is managed centrally by Rose Smith and made available to each depot via the company's intranet system. All procedures and policies that are required by the BRC Global Standard for Storage and Distribution, Issue 3.

Document Control

Procedures are in place for the control of all company documents and are detailed in the Document Control Procedure. All documents are given a document reference, document name, version number and issue date.

Document control is well organised with any documents amended by Rose Smith based at Head Office in Ashford. Rose is responsible for reviewing and actioning any approved authorised amendments via the intranet system before informing the individual sites directly via email to alert of any changes.

Record Completion

Quality and legal records are kept for a minimum of 5 years. Technical Managers have full access to the specifications and hub quality team's reference as needed. Specifications for Brake branded products are held on the Assure system at Ashford and were reviewed at the time of the audit.

Internal Audits

Internal Audits are scheduled and include all required section of the standard. A company internal audit schedule is in place and details the planned frequency of all internal audits. These are conducted annually at Head Office and Depot audits are conducted by the team of Depot Quality Managers at a minimum rate of at least twice per year. The frequency of audits is based on the number of NC's raised;

- A (less than 10 minors) = 4 – 6-monthly
- B (11 – 15 minors) = 3 monthly,
- C (>15 minors or 1 or more Majors) = 1 – 3-monthly.

A number of trained Internal Auditors are used, and impartiality is maintained. Various internal audit reports were reviewed during this assessment and records were seen to include non-conformance information, planned corrective actions and preventive actions, defined via root cause analysis where appropriate, and corrective action completion with verification (during next audit).

Corrective Action

Company procedures are in place for all required corrective action. Corrective action is applied for non-conforming products, complaints and any non-conformances raised during internal audits.

All corrective actions are logged on the Corrective Action Log and reviewed during Monthly KPI Reviews.

Customer Contractual Arrangements

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Procedures are in place for the control of customer contractual arrangements and are managed by Head Office. This involves over 400 Group Contracts and KPI's are established relating to customer requirements.

Purchasing

Contracts for service providers are managed centrally at Head Office and there are no subcontractors used.

Traceability

Traceability of products is managed through a SAP stock management system, which can trace the product from intake to depot movements and on to final despatch to the customer. A traceability challenge is conducted at least annually at each individual Depot.

Management of Product Withdrawal or Product Recall

Incident Management and Business Continuity

A product recall procedure is in place which is tested at least annually by head office (usually during actual product recalls). A business UK Incident Response and Crisis Management Plan is available and was reviewed during the assessment.

Incident management and crisis management procedure is comprehensive and details out of hours contacts. The manual contains complete information to deal with emergency situations procedures for escalation of incident plus team responsibilities.

Control of Non-Conforming Product, Damages and Returns

All non-conforming products highlighted during the Depot assessments and are referred to the category Product Technologist and logged on Assure.

Complaints Handling

This is a Head Office controlled function. Customer complaints are received by delivery drivers, customer services and telesales and are logged on to the SAP system. Complaint logs are collated by a Technical Administrator and are reviewed daily by the Technical Services Manager, Category Technical Managers and the Hub Quality teams. Complaints are analysed for trends on a rolling basis and Category Technical Managers control action plans with suppliers where required.

Reviewed:

There is a full QMS which is organised through the company intranet which all depots having direct access to. The QMS is managed from the head office by Rose Smith and covers all the requirements of the BRC standard Version 3. All documents are controlled by having a unique 6-digit number along with the date of issue. Depots have locally controlled records which will be challenged at each individual depot audit.

Document control procedure: 6GAHPZ/13.07.18. Amendments are shown on the intranet system with a complete record of all amendments and dates and version number. All amendments to central documents are emailed to the individual depots, with the intranet being a "live" system and all new documents available for immediate use. Depots are audited to ensure they are using the correct version.

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All records are retained for a period of 5 years if any temperatures recorded, or for a minimum period of a year as per procedure 6QLFTC/30.01.17 – electronic documents are backed up on the server daily. There is a schedule of internal audits for each Distribution Quality Manager's area – reviewed internal audit schedule for Rose Smith, covering head office. The QMS section of the head office audits are conducted at depot level to ensure independence from the system.

Reviewed Head Office audit conducted by Rose Smith DQM 20.06.18 with no issues noted
Rose Smith – Practical Auditing of Quality Management Systems to ISO 9001:1994 & ISO 10011-1:1994 – issued 1998

Corrective & preventive action procedure is in place and is linked to the QC Hold, Non-conformance & Rejections Procedure: 55CH54/12.09.13. All issues raised by the depots are recorded onto a central log, and issues are forwarded onto the suppliers with root cause analysis information required.

Reviewed: Rejection Investigation Response – ref: 1031250, issued 25.06.18 – Forresters (Sales) Ltd (CN) – reason Incorrect Weight, all weights below 1.65kgs & below T2 – root cause analysis was raw material supplied had not been checked for weight on intake and therefore had been packed underweight.

Contractual arrangements are in force for all customers and reviewed for:
Silverline Care Ltd covers: Parties; Agreement period; products and services to be supplied; pricing and other financials; key business assumptions; ordering procedure 7 deliveries; payment terms; terms and conditions of sale; termination; confidentiality; governing law and variations; assignment – signed by Brakes 25.04.18 and company 24.04.18

Supplier Approval & Monitoring Procedure including site services 8SUPP/22.02.17
Reviewed contract for Ecolab – pest control – commencement date 04.01.14 – rolling contract – signed by Sarah Holt

Reviewed contract for waste management by ACM – issued 01.01.16 – signed and dated 22.08.16 by Travis Was

Brakes Broadline Recall Procedure 6U79ZR/11.05.18 includes the method of communication to customers, all recalls are controlled through the head office with the depots being involved from a stock management system and any potential pick-ups from customers.

The company have had a product recall in 30.01.18 and reviewed: Recall Notification Form ref: PR74874-300118, product code C74874 – Brakes Tomato & Basil Sauce, batch code 7342; BB 07.02.18 – incorrect product (gluten containing) packed into a gluten free product – notice sent to customers to dispose of any remaining product and claim credit. Numbers of customer involved checked through a sales report with the sales team given the responsibility to inform the necessary customer. Notified certification body on 07/02/18 BH to MW/RE.

Incident Management Procedure issued 19.09.16 with a central number to call in the event of any process which could affect the entire business, with each individual depot holding a site-controlled Business Continuity Plan covering the requirements of each depot.

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QC Hold, Non-conformance & Rejections Procedure: 55CH54/12.09.13. All issues raised by the depots are recorded onto a central log, and issues are forwarded onto the suppliers with root cause analysis information required.

Returned Products Procedure 4NYBWL/11.06.18 covers; QC Collection; Collection; Undelivered Goods; Brake Logistic Customer Returns; Internal Transfers - chilled products which have been outside of Brake's control are not accepted back and disposed of. Ambient and frozen goods are risk assessed on return before being accepted back into stock.

All complaints are handled by the customer services team at head office who log and record all complaints received via the central number for all customers to call. Complaints are then passed across to the relevant department for investigation, where applicable. The technical team will be involved with serious quality and foreign and alleged illness investigations.

Reviewed the current trending analysis on the technical dashboard, which is divided into individual tabs covering all of the product categories and includes all the trending YOY and period by period. Customer complaint levels form part of the objectives are reviewed on a monthly basis as well as the senior management review.

N/A Clauses

No.	Justification
3.5.2	No sub-contracted process
3.6	Traceability not challenged at head office – to be challenged at depot level.

4. Site and Building Standards

This report relates to head offices functions only and therefore this section of the report is not applicable

N/A Clauses

No.	Justification

5. Vehicle Operating Standards

This report relates to head offices functions only and therefore this section of the report is not applicable

N/A Clauses

No.	Justification

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Report No: C0146919

Auditor: John Howells

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6. Facility Management

This report relates to head offices functions only and therefore this section of the report is not applicable	
N/A Clauses	
No.	Justification

7. Good Operating Practices

This report relates to head offices functions only and therefore this section of the report is not applicable	
N/A Clauses	
No.	Justification

8. Personnel

This report relates to head offices functions only and therefore this section of the report is not applicable	
N/A Clauses	
No.	Justification

WHOLESALE MODULE

9. Purchasing – branded products

The Head Office is the central location for the management of suppliers and products and a supplier approval, management and review system is contained on an Assure database which is managed by	

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Category Technical Managers. The Meat & Poultry category was reviewed with the Technical Manager. Suppliers are required to complete a self-audit questionnaire. The questionnaires are reviewed, and suppliers are risk assessed based upon whether 3rd party certification is held, product and business exposure risk. Dependent upon the risk, suppliers are audited by the Brakes Technical Management team. All suppliers receive a copy of Brakes terms and conditions, which includes a warranty statement.

Reviewed:

Company documented procedure for supplier approval and monitoring: 6FHJKP/21.11.06 is in the form of a flow chart process. Exceptions must be authorised by the Brakes Technical Director.

Vendor Brand Supplier Questionnaire reviewed for:

On-going supplier approval system is based on complaint levels and managed by the category technical manager responsible and the technical team

N/A Clauses

No.	Justification

10. Requirements for the purchasing and management of a wholesale own label products and Wholesaler exclusive brands

The Head Office is the central location for the management of suppliers and products and supplier approval for Brakes branded products is managed by the Category Technical Managers. Suppliers must hold a valid third part GFSI certificate equivalent to a BRC Food version 7, grade A or B. Suppliers and products are risk rated to determine visit frequency;

- Low Risk – no visit required,
- Medium Risk – 5-yearly
- High Risk – minimum 2-yearly.

Suppliers complete a product specification on line using the Assure system, which is submitted for approval before supply can commence.

The specification requests details on various sections including product safety, ingredient declarations, allergen summary and microbiological standards. Regular category review meetings are held to agree priorities, review supplier / product performance and approval / de-listing of supplier.

New products / suppliers are managed by the Merchandising Team which includes NPD team members. The NPD manager will liaise with the supplier to generate a feasibility study and product samples, once approved the product/supplier will move through the NPD gated process.

The Technical Manager for the category will get involved at the point of product specification generation and product safety/allergen review. Product inspection and analysis is primarily conducted by the suppliers with results reviewed by the Technical Manager, however when needed the business uses an external UKAS accredited laboratory to conduct product analysis.

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The whole supplier approval process was explained in great detail by Ian Dolman, Meat & Poultry, Category Technical Manager and involves working with sites in detail, first products runs, site audits and a full approval system.

Supplier Site Approval – Own Brand Procedure issued 28.12.16 – pre-requisites are:

- BRC Grade A or B
- BRC Hygiene Std for Packaging Suppliers
- IFS Higher Level
- Alternative GFSI standard
-

Reviewed A1 Bacon Co Ltd – SSAQ completed 20.06.17 and approved on the Assure System 21.08.17
– BRC Grade AA by STS, exp. 02.05.19

Brakes TACCP Procedure 9TACCP/10.04.18 – includes:

- Economically motivated adulteration for personal gain
- Malicious contamination, with materials / objects or sabotage of the supply chain leading to food issues, ill health or death
- Misuse, extortion, espionage of food / drink products for terrorist or criminal purposes
- All forms of fraud

Used PAS96 2016 and Campden BRC Guide 2014 – all Brakes approved suppliers have to be BRC / GFSI equivalent approved.

Risk assessment in place for each category group and covers the requirements of the standard. Horizon scanning is conducted through Horizon Scan: Food Industry Intelligence Network. The risk assessment was last updated 08.02.18 with a risk rating of Severity V's Likelihood based around a 3 x 3 scoring matrix.

VACCP risk assessment has been conducted in conjunction with the TACCP and regards product integrity issues including fraud (including fraudulent claims). Suppliers are challenged to provide assurances for substitution of fraud. High risk products are subject to Brakes annual surveillance program which includes analysis for meat speciation, typically 30 products every month through Eurofins laboratory.

Reviewed:

71393 – Horseshow Gammon – no other species detected – report AR-18-UD-281602-01, issued 25.07.18

Specifications are held for all products on the Assure System and reviewed for:

A1- Bacon – Rindless Back Bacon, spec number 24130, Brakes code C70071, approved 21.08.17. The Assure System automatically flags up that specifications required to be reviewed minimally every three years.

NPD tracker reviewed for Meat & Poultry category with different tabs following gateway process and checks, new ingredients required, depot launch day and supplier.

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Shelf life trials and validations are based around existing products and historical evidence. Reviewed first production trial information for the Rindless Back Bacon supplied by A1-Bacon, conducted 11.08.17 attended by Ian Dolman of Brakes, shelf-life has been approved at P+35 days.

The traceability of all own brand products is maintained through the Assure Specification system which identifies the traceability system as being the lot code and durability codes of all products being supplied into the depots. The company last challenged the traceability system 03.07.18 for Brakes Easy Cook Basmati Rice, code 16805, batch L8116 BB April 2020. Full documentation is maintained on the surveillance programme database with the company requiring a list of supporting documentation to be completed and sent back. The supplier Soufflet Alimentaire. The trace was completed within the 4-hours timescale.

The company have had a product recall in 30.01.18 and reviewed: Recall Notification Form ref; PR74874-300118, product code C74874 – Brakes Tomato & Basil Sauce, batch code 7342; BB 07.02.18 – incorrect product (gluten containing) packed into a gluten free product – notice sent to customers to dispose of any remaining product and claim credit. Numbers of customer involved checked through a sales report with the sales team given the responsibility to inform the necessary customer. Email evidence reviewed of NSF notification issued 07.02.18, with response received from Rob Evans 07.02.18.

Incident Management Procedure issued 19.09.16 with a central number to call in the event of any process which could affect the entire business, with each individual depot holding a site-controlled Business Continuity Plan covering the requirements of each depot.

QC Hold, Non-conformance & Rejections Procedure: 55CH54/12.09.13. All issues raised by the depots are recorded onto a central log, and issues are forwarded onto the suppliers with root cause analysis information required.

Returned Products Procedure 4NYBWL/11.06.18 covers; QC Collection; Collection; Undelivered Goods; Brake Logistic Customer Returns; Internal Transfers - chilled products which have been outside of Brake's control are not accepted back and disposed of. Ambient and frozen goods are risk assessed on return before being accepted back into stock.

N/A Clauses

No.	Justification

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