

Audit Report

Global Standard for Food Safety Issue 7: July 2015

1. Audit Summary			
Company name	AAK (UK) Limited	BRC Site Code	7709885
Site name	AAK (UK) Limited		
Scope of audit	The refining and packing of crude bulk oils and the production and packing of flaked fats, bakery fats, vegetable and flavoured coloured blended fats and speciality oils into plastic lined cartons, drum, sack, plastic pails or IBCs. The bottling of speciality oils, soy sauce, vinegars and vinegar blends into glass and plastic bottles. Offsite storage at Earls Road and Staithes Road, Hull		
Exclusions from scope	Traded Goods		
Justification for exclusion	Traded goods such as glass jars of coconut oil and cider vinegar are excluded - these are manufactured by a third party, purchased and stored prior to onward sale.		
Audit Finish Date	2016-05-12		
Re-audit due date	2017-05-19		

Voluntary modules included		
Modules	Result	Details
Choose a module	Choose an item	none
Choose a module	Choose an item	

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Announced
Previous audit grade	A	Previous audit date	2015-05-22		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	5

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3. Company Details			
Address	King George Dock Hull HU9 5PX		
Country	UK	Site Telephone Number	+44 1482 701271
Commercial representative Name	Kaly Chatakondur	Email	Kaly.chatakoondur@aak.com
Technical representative Name	Elaine McAulay	Email	Elaine.mcaulay@aak.com

4. Company Profile					
Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	Kosher, Halal, Organic, RSPO				
Regions exported to	Europe North America South America Oceania Asia				
Company registration number	n/a				
Major changes since last BRC audit	None				
Company Description					
<p>The site was constructed in 1983, originally as Anglia Oils and was acquired by Aarhus United Group and then by merger with Karkshamn Group to form AAK (UK) Ltd. The site is located within King George Dock, Hull with direct access for the unloading of consignments of oil directly from barges and ships as well as by road. Activities undertaken on site include vegetable oil refining, food service and speciality oils filling area, a bakery fats production area, a flaking plant, a release agent plant, an oil and vinegar blending area and bottling area for blended oils and vinegars. The site operates 24 hours a day with refining operating 2 x 12 hour shifts for 7 days a week and for 3 x 8 hour shifts Monday to Friday for other departments. Products are sold to a variety of customers including retail, food service and manufacturing customers. The company leases two warehouses at Earls Road and Staithe Road.</p>					

5.Product Characteristics					
Product categories		13 - Alcoholic drinks and fermented/brewed products 18 - Oils and fats			
Finished product safety rationale		Low aW of oils (<0.5), low pH of vinegars (<3.2). Products are ambient stable with a shelf life if up to 2 years. Some fats are stored at 16°C for quality purposes.			
High care	No	High risk	No	Ambient high care	No
Justification for area		There are no high care, high risk or ambient high care areas on site - all production is low risk or enclosed product area			
Allergens handled on site		Cereals containing gluten Peanuts Nuts Soya Milk Fish Sulphur dioxide and Sulphites Sesame			
Product claims made e.g. IP, organic		Organic, RSPO Palm Oil			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Toasted sesame oil retail pack, Crestawhip Greetin XT 1000kg bulk container, Fry pure palm oil 12.5kg block, Sunflower oil retail brand spray pump, Prep Veg oil blend 12.5kg block, Flaking fat blend, Rapeseed oil retail 1 litre bottle			

6. Audit Duration Details			
On-site duration	20 man hours	Duration of production facility inspection	11 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 (start date)	2016-05-10	09:00	17:00
2	2016-05-11	09:00	17:00
3	2016-05-12	09:00	13:00

	Auditor <u>(s)</u> number(s)	Names and roles of others
Auditor Number	123310	Angela Wain - Lead Auditor
Second Auditor Number	N/A	

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 1.1.9)				
	Name / Job Title	Opening Meeting	Site Inspection	Procedure Review
Geoff Craft - Production Manager	X	X		
Conrad Penrose - Plant Manager	X	X		X
Philip Shaw - Purchasing Manager	X		X	X
Elaine McAulay - Technical Manager	X	X	X	X
Marcus Bense - Site Manager - Hull KGA and ESC Technical Director	X			X

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Present at audit				
Frank Barker - Training	X		X	
David Mather - Quality Assurance Manager	X	X	X	X
Steve Tate - Laboratory QC Manager	X	X	X	X
Rachel Gallop - Quality Systems Manager	X		X	X
Michael Barden - Safety, Health & Environment Manager	x		X	
Mark Rogers - UK Engineering Manager	X		X	X
Graham Scholey - UK Supply Chain Manager	X		X	X
Alun Jones - Technical Product Manager	X		X	
Alan Aitchison - Refinery Product Manager	X	x		



Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	Clause	Details of non-conformity	Critical or Major?	Anticipated re-audit date

Critical			
No.	Clause	Details of non-conformity	Anticipated re-audit date

Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by

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Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by
1	4.6.2	The company was not able to provide evidence that equipment that is in direct contact with food is suitable for food contact and meets applicable legal requirements	<p>Evidence available for hoses that are used for food contact available.</p> <p>Evidence available that during quotation stage equipment that is to be food contact is specified within the Food grade stainless steel.</p> <p>Evidence of feed oil buffer tank that is produced from food grade material SS304 (AISI304)</p>	Procedure to be put in place to ensure documents are available and checked for equipment that is purchased food contact.	<p>Hose spec and quotation</p> <p>Feed Oil Buffer Tank – declaration of conformity.</p>	2016-05-10	A WAIN
2	4.9.1.1	Three containers of chemicals were not stored securely in the amenity area at the Staithes Road Warehouse	Large lockable cupboard provided and in use.	Ensure all chemicals are locked away via audits.	Photographs showing chemical storage.	2016-05-10	A WAIN

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3	5.2.2	Outer case label for Toasted Sesame Seed Oil states Country of Origin as Canada and the product label states Mexico which is the correct country of origin	Outer case label updated to remove origin details of Mexico.	Prompt in the artwork approval flow put in to ensure that this label system is considered going forward. This will prevent it being missed and forgotten about when dealing with updated. Awareness of this system is now built into written systems rather than relying on individuals remembering about it.	Photographs labels before and labels after. Artwork approval prompt email confirmation from customer	2016-05-10	A WAIN
4	6.2.1	Labels from previous run of retail pack of oil spray were left on line 2 in the Speciality Oils Area	Operatives retrained in the procedure.	To be audited as part of the QA GMP audits	Training record P70 Procedure Labelling, Pack Control And Line Clearance	2016-05-10	A WAIN
5	7.2.5	Personal medicine (Cold/Flu Remedy) was found in the North Refinery Production Office	Manager trained in procedure. Locker now available for manager to sort personnel items.	All managers to be trained in procedures. Added to the training system.	Training record P 09 Personal Hygiene & Protective ClothingStandards	2016-05-10	A WAIN

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Comments on non-conformities

none

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Voluntary Modules Non-Conformity Summary Sheet

Critical			
No.	Clause	Details of non-conformity	Anticipated re-audit date

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Major							
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Minor							
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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

There is a Food Safety and Quality Policy in place reference QP issue 4 dated 5/2/16 which is signed by the Finance Director and the UK Site Manager and Technical Director ESC. The Policy was seen to be displayed in the factory and is included in the site Induction programme. Objectives were seen to be in place for 2016 which include third party and customer audits, customer complaint, product conformity, service levels and supplier performance. There is a Senior Management Review Meeting in place dated 15th January 2016 which includes review of previous meeting minutes, internal and external audit results, customer complaints and feedback, incidents and instances where corrective actions or non-conformances have occurred, a review of HACCP, food defence and authenticity and a review of resource requirements. There is a Quarterly Review Meeting in place which reviews safety, legality and quality and includes Quality Objectives - minutes were seen for the last meeting held on the 18th April 2016. In addition to the annual and quarterly meetings, monthly reviews are also in place to include a technical update to include complaints, specification compliance, internal audit status and customer/third party audits and visits - minutes were seen for meeting held on the 23rd March 2016 and were seen to be satisfactory. Human and financial resources were seen to be in place.

The audit was undertaken within the audit due date indicated on the certificate. The company keep up to date with scientific and technical developments, industry codes of practice, risks to authenticity and legislation in the country where product is sold by member of Campden BRI valid to 31/8/16, Leatherhead Food Research Association valid to 30/6/16, Seed Crushers and Oil Processors Association (SCOPA) and FEDIOL. The company supplies retail customers and have access to their Codes of Practice. Issue 7 BRC Global Standard was seen to be available on line.

The UK Site Manager and Technical Director ESC attended the opening and closing meeting of the audit. There were 5 non-conformances raised during the 2015 BRC audit - these were seen to have been addressed with no re-occurrence.

1.2 Organisational structure, responsibilities and management authority

There is a AAK Hull - Organisation Structure in place reference 1.2 issue 8 dated 1/4/16 which sets out the overall organisation structure for Hull site and the interaction with Business Area organisation functions such as Commercial Director and General Sales Manager. There are job descriptions in place which were reviewed for: UK Engineering Manager signed and dated 11/6/15 and for Hull Site Technical Manager signed and dated 13th April 2015.

Details of non-applicable clauses with justification

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Clause reference	Justification
	Nil

2 The Food Safety Plan – HACCP

HACCP team: There is a HACCP plan in place for the site which has been developed and managed by a multi-disciplinary food safety team. The HACCP plan is divided into two - Refined Oils and Blended Oils and Fats. The HACCP plan is then further sub divided into 6 sub-sections. Each of the 6 HACCP sub-sections has a specific HACCP Team with a core HACCP Team Leader. Examples of training certificates were seen for: HACCP Team Leader - Quality Assurance Manager - Level 4 HACCP - Distinction 22/12/14. Multi-disciplinary team - Technical Manager - Level 4 HACCP - Pass 13/1/12, Refinery Manager - Level 3 Refresher - 4/10/12, Maintenance Manager - Level 3 Refresher - 4/10/12, Product Technical Manager - Level 4 HACCP - Pass 29/10/12. The HACCP team members were seen to have suitable knowledge and experience for the products being produced by the site.

Products: The scope of the HACCP plan has been set out to include the products and processes covered. The HACCP study is sub divided into 6 sections depending on processing area - Refinery, Foodservice, Bakery, Bakery Services, Flaking and Speciality Oils. There is a scope in place for each of the sub sections of the HACCP Plan - Refinery HACCP R issue date 5/5/16 version 4, Foodservice HACCP FS issue date 18/1/16 version 3, Bakery HACCP B issue date 3/12/15 version 3, Bakery Service HACCP BS issue date 15/5/15 version 3, Flaking HACCP F issue date 26/4/16 version 3.2 and Speciality Oils HACCP SO issue date 17/12/15 version 3.1. Prerequisites are set out in each HACCP scope document and include document control, audit programme, training, transport, pest control, purchasing, maintenance, hygiene, allergens, personal hygiene and processes to prevent cross-contamination.

The HACCP scope documents include a description for each product which includes information relevant to food safety to include - composition, origin of ingredients, physical or chemical properties affecting food safety e.g. Aw and pH, process treatments, packaging, storage and distribution and shelf life information. The information used to conduct the HACCP analysis was seen to have been retained and maintained up to date. Information used includes relevant legislation, hazard information relating to oils and fats, customer codes of practice and industry guidelines etc. The intended use of the product is included in each of the HACCP scope documents.

Process flow steps: There are process flow diagrams and records of verification in place for each of the 6 sub divided HACCP plans: Refinery HACCP R issue date 5/5/16 version 4 date of verification 5/5/16, Foodservice HACCP FS issue date 18/1/16 version 3, Bakery HACCP B issue date 3/12/15 version 3, Bakery Service HACCP BS issue date 15/5/15 version 3 with flows for Crestawhip Line, Emulsion Line, Lardine and Rolloff Line, Sheenex Line, Flaking HACCP F issue date 26/4/16 version 3.2 and Speciality Oils HACCP SO issue date 17/12/15 version 3.1 with flows for Drumming and Bottling. The HACCP plans and process flow diagrams include details of site premises and equipment, raw material flows, process steps, rework, segregation and waste.

Hazards: The HACCP teams have considered physical, chemical, microbiological and allergenic hazards

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for each of the process steps set out in the HACCP flow diagrams. All hazards have been risk rated for likelihood and severity. Hazards are then assessed through a decision tree based on Codex Alimentarius principles. Control measures are in place for each hazard including both prerequisites and CCPs. Validation methods of CCPs were seen to be in place for: Filtration 9/5/16, UV Filtration lamp CCP validation dated 9/4/16 and Foodservice CCP validation dated 25/4/16 for 12.5kg and 10kg block.

For each hazard requiring control by a CCP, this is identified and critical limits have been put in place:

Prod Area	CCP1		CCP2		CCP3	CCP4
Refinery	Step 11 Carbon Bleaching	B(a)P Infant Formulae 1.0ppb B(a)P Oils 2.0ppb	Step 24 Final Filtration	5 micron Filter in place and intact.		
Bakery	UV Sterilisation – 4 bulbs lit and working		Filtration ex Buffer tank – filter in place and intact (1000µ)		Metal Detection 4.0mm Fe 4.0mm non-Fe 4.0mm SS	
Food service	Filtration ex Oil Storage 50µ Filter present and intact		Filtration Filter in place and Intact Output to IBC (1mm) Output to Tanker (500µ)		Metal Detection 2.5mm Fe 3.0mm non-Fe 3.0mm SS	Filtration output Filter in place and intact output to Spec Oils (3mm)
Spec Oils – Drumming	Final Filtration Output Filter in place and Intact to IBC's 0.5µ & 5µ(product specific) to bottling 0.5µ &5µ (product specific)					
Spec Oils – Bottling	Final Filtration Incoming Oil Filter in place and Intact		Bottle Inverter Blower setting 28-40PSI			



	From IBC's (5µ)			
	From Vinegars (0.5-5µ)			
Bakery Services	Final Filtration (tanks & Pails) 50-5000µ (Line and product specific) Filter in place and intact	Final Filtration (Road Tankers) 5-400µ (line and product specific) Filter in place and intact.		
Flaking	Filtration ex Buffer tank	Metal Detection		
	Filter in place and Intact Flaker 1 250µ (basket) Flaker 2 300µ (cone)	Flakers 2.5mm Fe 3.0mm non-Fe 3.0mm SS		

Monitoring and corrective actions are in place for each CCP, these are set out in each HACCP Plan - Refinery HACCP R issue date 5/5/16 version 4, Foodservice HACCP FS issue date 18/1/16 version 3, Bakery HACCP B issue date 3/12/15 version 3, Bakery Service HACCP BS issue date 15/5/15 version 3, Flaking HACCP F issue date 26/4/16 version 3.2 and Speciality Oils HACCP SO issue date 17/12/15 version 3.1. HACCP review and verification is in place to include a review of internal audits, complaints and incidents - refinery 9/3/16, Bakery Services 12/4/16, Flaking 16/9/15, Speciality Oils 24/9/15, Foodservice 23/12/15 and Bakery 18/9/15. The HACCP review also incorporates the annual HACCP review for each plan to include any changes in raw materials, recipe, process conditions, packaging, consumer use, new risks to food safety or integrity, in the event of a recall and a review of any new developments in scientific information. Records and documents were seen to be in place and were reviewed during the site tour, during the document review and as part of the traceability exercise and were seen to be satisfactory.

Details of non-applicable clauses with justification

Clause reference	Justification
	Nil

3. Food safety and quality management system

3.1 Food safety and quality manual

There is a Food Safety and Quality Manual in place which is regularly updated along with documented procedures and practices. These were reviewed during the document review and as part of the site tour and were seen to be clearly written and available as required to staff.



3.2 Documentation control

There is a Document Control Procedure in place P01 dated 5/5/16 issue 7 which sets out requirements for document control to include version controls, authorisation, record of change and rescinding of out of date documents. This was reviewed during the factory tour and during the document review and correct document versions were seen to be in use.

3.3 Record completion and maintenance

There is a Maintenance and Storage of Records Relating to Manufacturing Traceability P02 dated 20/8/15 issue 4. Records are retained for a minimum of 3 years. Records were reviewed during the factory tour, during the document review and traceability exercise and were seen to be in good condition and retrievable.

3.4 Internal audit

There is procedure in place for Internal Auditing P33 dated 3/12/15 version 9 which sets out internal audit requirements for scope to include HACCP, prerequisites and the requirements of the BRC Global Standard. All areas in the scope are audited at least annually based on a risk assessment. Customer codes of practice are incorporated into the internal audit schedule reference S33 dated 19/4/16 issue 9. Auditors are trained and competent and are not permitted to audit their own work. Training records were seen Auditors A and B - both holding a FDQ Auditing Skills Certificates both dated 4/2/14.

Inspections: The internal audit programme was seen to be fully implemented and the following internal audit records were reviewed: Internal audit - Allergens dated 1/12/15 audit number 168 with records of conformity and non-conformity with non-conformances raised for 2 minor and 2 observations. Non-conformances 168 are logged on a non-conformance spreadsheet and were seen to be signed off on the 23/2/16 and 24/4/15 respectively. Internal audit for Allergens was also seen dated 11/3/16 with no non-conformances raised. Internal audit was seen for Recall Test number 190 dated 1/5/16 and 2/5/15 with 5 non-conformances raised - audit still open and awaiting sign off. Monthly GMP audit records were seen for 29/1/16 KGD Warehouse, 29/2/16 Bottling and 15/3/16 Drumming. Weekly Hygiene audit records were seen for Warehouse GMP and Hygiene Audit - Keystone 14/1/16, Flaking 24/3/16 and for Foodservice 24/2/16. All were seen to have inspections documented along with any corrective actions and dates of completion.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

There is a P12 Supplier Risk Assessment Procedure dated 5/5/16 version 3 in place which sets out requirements for raw material and supplier approval based on risk of allergen contamination, foreign body risk, microbiological contamination, chemical contamination and possibility of substitution or fraud. In addition there is a more detailed TACCP study in place for each raw material type and supplier. There is an AAK Group Approved Supplier List in place which sets out details of all suppliers used on site. There are no Agents and Brokers in use - all supplies are direct. The Approved Supplier Risk sets out the risk assessment for each supplier based on the P12 Procedure to include risks to authenticity in addition to food safety. The procedure sets out requirements for supplier approval based on certification by GFSI audit standard, supplier audit or for low risk suppliers only by Supplier Approval Questionnaire. Requirements for handling any exceptions are detailed in the procedure.



Supplier approval records were reviewed for the following suppliers based on the traceability exercise undertaken: Crude Palm Oil - Supplier A - company address in Belgium and production address in Papua New Guinea with approval based on site audit dated 3/2/16.
Crude Palm Oil - Supplier C - approval based on SAQ dated 16/5/14 including traceability records
Whirl Tub - Supplier B - approval based on questionnaire dated 3/11/14 and also holding BRC IOP certificate - grade B with expiry date of 15/8/16.

3.5.2 Raw material and packaging acceptance and monitoring procedures

Raw materials and packaging are reviewed on receipt based on product sampling and testing e.g. for bulk consignments of oil, visual inspection e.g. for packaging and/or by certificates of analysis or conformance e.g. for bulk consignments of oil. There is an AAK Group Approved Supplier List in place which sets out details of all suppliers used on site which is used to cross check supplier approval status at intake. Observation of unloading of a bulk barge of oil was seen during the factory tour from the vessel Straight View. Oil sampling was seen to be undertaken prior to discharge with analysis undertaken by the site laboratory prior to release. The vessel was seen to be holding refined rapeseed oil, crude sunflower oil and crude high oleic sunflower oil. The FOSFA certificate was seen for the vessel dated 10/5/16 which included details of last 3 cargoes and of hold tank cleaning records.

3.5.3 Management of suppliers of services

There is a P05 Suppliers of Services Procedure dated 31/3/16 version 9 which sets out requirements for approval and monitoring of suppliers of services. Examples of service level agreements were seen to be in place for Contract Catering dated 12/1/15 and for Refrigeration Services also dated 12/1/15

3.5.4 Management of outsourced processing and packing

There are no outsourced processes undertaken by the site.

3.6 Specifications

There is a procedure P12 Specification Review dated 5/5/16 version 3 in place which sets out requirements for approval, agreement and review of raw material, work in progress and finished product specifications for AAK branded products and for customer branded products. Specifications are reviewed at least every 3 years and the date of approval and/or review is recorded on the specification. The following specifications were sampled as part of the traceability exercise:
CAT-0623 Akofluid 15/SG version 2 dated 18/7/12
Finished product specification Akofluid 15/SG dated 24/6/15 version 5
AK Crude Palm Oil specification dated 7/11/13
Degummed Rapeseed Oil specification dated 14/5/14
Crestawhip Finished product specification dated 10/5/16

3.7 Corrective and preventive actions

There is a procedure P27 Corrective and Preventive Action Procedure issue 1 dated 4/11/13 and a procedure for Root Cause Analysis 27 dated 12/12/13 version 1 which set out requirements for handling of non-conforming product to include documentation, assessment by the Technical or Quality Assurance Manager, requirements for immediate actions for correction and root cause analysis, responsibilities and verification of completion of the corrective actions and root cause analysis.



3.8 Control of non-conforming product

There is a procedure for Control of Non-Conforming Product, Ingredients and Packaging issue 3 dated 18/2/15 which sets out requirements for managing non-conforming products. A hold notice was seen in factory for EMUL 11784 - 143872 dated 10/12/15 held in location H23 AKGD - this was seen to be subject to the P22 Quarantine Procedure and was held electronically pending release by the on site Laboratory.

3.9 Traceability

The site has a full traceability system in place to identify raw materials including packaging, processing aids, work in progress and finished products. Traceability is maintained during any re-work operations. A traceability exercise was undertaken as part of the site audit as follows for the product:

Product Name: CAT- 0623 AKOFLUD 15/SG - BBE 9/2/17
89% Rapeseed and 11% Palm Stearin/SG
IPK0122696

Crude palm oil - consignment number 3371 dated 21/1/16 from supplier A and from 10/2/163382 from supplier A

Palm Stearin derived from C5 and C9 from Econo flow 4.

Palm Stearin fractionated 23/1/16 R2 batch codes 2083, 2084 and 2085 from feed tank OR5

Crude rapeseed oil - lowest tank level 21/12/15 consignment number 3346, 3356 received 16/1/16, 3368

19/1/16 3370 received 22/1/16 and 27/1/16 3373 into C2 all from Cargill Hull

Crude rapeseed oil C2 with transfer to H3 from 20/1/16 to 2/2/16

Tank B11 Rapeseed oil from 21/1/16 with B11 to Econo 2 on 21/1/16 produced from H3 tank

Transfer of Rapeseed Oil and Palm Stearin 8/2/16 from B11 and R2 respectively

Daily tank record 8/2/16 R15 tank holding AKOFLUID 15

Analysis of oil undertaken 8/2/16 released for packing 9/2/16

Certificate of Analysis generated 9/2/16

Refined oil tank R15 with batch code B0416E with crystalliser C2 to produce D2977

Date of packing 10/2/16 time of packing - 8 Units were produced 7-3pm shift

Seal and tank numbers were recorded on the Shift Production Record

Batch code D2977 day code 6041

Despatch dates between 4/3/16 and 21/3/16 - all 8 units despatched to 3 customers with 4 delivery locations

CCP Filter checks were seen dated 10/2/16 for 1mm filter size

The site also undertakes trace exercises and mass balance - examples were seen for

Organic Sunflower Oil undertaken 15/3/16

Scottish Cold Crushed Rapeseed Oil undertaken 16/3/16 which included a mass balance

The site also undertakes trace exercises as part of audits for authenticity schemes such as Halal, Kosher, RSPO and Organics - Soil Association. Where supplier approval is based on a questionnaire, a record of supplier traceability is maintained on file.

3.10 Complaint handling

There is a procedure for complaint handling P69 Complaint Handling Procedure dated 30/3/16 issue 1 which sets out requirements for recording and investigating customer complaints. Examples of complaints were seen for complaint dated 26/1/16 - too thick - a was sample requested and investigated for product Greetin BR and letter returned to customer 15/4/16. Also for a complaint dated 28/1/16 - foreign body - this was identified as cardboard in product from the packaging material - as part of the corrective action the supplier contacted to ensure that cardboard is trimmed from packaging and a letter returned to the

customer.

3.11 Management of incidents, product withdrawal and product recall

There is a procedure in place for handling of incidents, product withdrawal and product recall - P16 Crisis Management and Recall Procedure dated 18/8/14 issue 4. The procedure includes requirements in the event that there is a disruption in key services such as water or electricity, events such as flood or fire or malicious contamination. The procedure also includes requirements in the event of a product withdrawal or recall to include the recall team, guidance on the decision to withdraw or recall product and the requirement to notify the Certification Body within 3 days in the event of a product recall. There is a Contact List in place dated 5/4/16 issue 4 with site contacts and contacts such as the Certification Body and regulatory authorities. There is a customer and supplier contact list on shared Bespoke data base. The recall procedure is tested at least annually and the latest AAK product recall test was undertaken on the 3rd May 2016.

3.12 Customer focus and communication

There is a procedure in place to ensure customer specific policies and procedures are available and applied - P3.12 Customer Focus and Communication dated 31/3/16 issue 1. Customer Specifications and Codes of Practice are documented and logged onto a site wide Customer Codes of Practice database. In addition the documents are emailed to Technical, NPD for review and action. Customer codes of practice are incorporated within the internal audit programme.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.1.3	There are no Agents and Brokers in use - all supplies are direct
3.5.4	There are no outsourced processes undertaken by the site

4. Site standards

4.1 External standards

There is a Local Activities Risk Assessment in place dated 17/4/15 which sets out considerations for local activities and the site environment. External areas were seen to be well maintained and in good order. External building fabric was suitably maintained to minimise product contamination.

4.2 Security

There is a P44 Security Review in place dated 16/3/16 issue 3 along with Site Security Review 2016 which include the Earls Road and Staithe Road storage areas and bulk oil intake areas and which set out the security arrangements for the site. Measures were seen to be in place to ensure site security and included: Manned reception, out of hours security, key code access to external doors, ID security cards for

personnel, locked gates and security fencing. Additionally the site is under the control of Associated British Ports who have a manned gate requiring photo ID for access to the dock areas. There are a large number of external bulk tanks and silos on site (129 tanks) in the various tank farms which are not locked - however they are subject to a high level of site security including metal security fencing, locked gates, security patrols etc. The site is registered with Hull City Council.

4.3 Layout, product flow and segregation

There is a Product Risk Zones map in place dated 2/5/16 which sets out enclosed, low risk and non-product areas. In addition, there are Waste flow diagram dated 2/5/16, Materials Flow dated 2/5/16 and a People Flow dated 2/5/16. Contractors and visitors are subject to access controls including security sign in and health questionnaire completion. The movement of staff, work in progress, raw materials and waste was seen not to compromise the safety of products or risk product contamination. There are no high risk, high care or ambient high care areas on site. Premises were seen to allow sufficient space and storage capability for operations to be undertaken effectively. There were no temporary structures in place at the time of the audit.

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

Walls, floors, ceilings and external doors were seen to be suitably constructed and maintained in good condition. Drainage was seen to be suitable for site operations. There are no high care or high risk facilities on site. For suspended ceilings, access is provided to ensure pest control inspection. There are opening windows in enclosed product areas of the factory which are screened against insect access. There are glass windows in some enclosed product areas of the factory e.g. refinery which are protected by plastic screening against breakage. Suitable screened lighting was seen to be in provided. Lights including insect killing unit glass tubes were seen to be protected against breakage. Adequate ventilation and extraction was seen to be in place.

4.5 Utilities – water, ice, air and other gases

There is a Site Drainage Map in place dated July 2014. Also maps for Foul Drainage - dated September 2006 and Effluent Drainage - dated September 2006 Water mains to site from Yorkshire Water with certificates dated 12/10/15. There is a water sampling schedule in place which is based on the site water diagrams. There is a Water Sampling and Testing Procedure dated 1/5/15 issue 2 along with a Site water plan dated May 2016 with individual site plans in place also. Water test results were seen for 7/4/16 for sampling points for Bakery Product, Canteen Hygiene, Laboratory Hand wash, Laboratory Hygiene and were seen to be satisfactory. There is no water in use on site which is considered to be non-potable. Nitrogen is used in the oil hydrogenation process and data sheets - Allergens dated August 2015 and suitability for Food Use dated October 2013 were seen to be in place.

4.6 Equipment

Equipment in use was seen to be constructed of appropriate materials which were seen to be effectively cleaned and maintained. However, the company was not able to provide evidence that equipment that is in direct contact with food is suitable for food contact and meets applicable legal requirements (N/C).

4.7 Maintenance

There is a Piranha system in place for Planned Preventive Maintenance operations which is based on risk assessment. The PPM plan and records were reviewed for Food Service and Bakery area - PPM records were reviewed for FC60 Metal Detector last PPM dated 18/12/15 with next PPM scheduled for December 2016. Also for Checkweigher 1183 with PPM dated 18/12/15 also due in December 2016. For temporary works or emergency works - these are recorded on Piranha and an example was seen numbered 1611 for emergency works to a lighting unit. Maintenance is undertaken by trained staff and is followed up by hygiene cleaning, inspection and sign off as required. There are no high risk or high care areas on site. Materials in use for maintenance for food contact are suitable for food use - certificates of allergen status dated 1/2/16 and suitability for food use dated 22/11/11 were seen to be in place for Food Lube. The engineering workshops on site were seen to be clean and tidy with controls in place (e.g. swarf mats) to prevent transfer of engineering debris into production or storage areas.

4.8 Staff facilities

Designated changing areas are in place along with storage to accommodate personal items. External clothing is stored separately from work protective clothing. There are no high risk or high care areas on site. Hand washing facilities were seen to be in place with suitable provision for hot water, soap, towels etc. Toilets were adequately segregated from production areas. Smoking of cigarettes and e-cigarettes is permitted only in designated external smoking areas. Food brought onto site is stored in fridges which are monitored by the site and is permitted to be eaten only in the canteen area. Fridge temperature checks for period 13/4/16 - 6/5/16 were seen to be satisfactory for Food service area recorded on sheet Fridge Temperature Check Sheet R58a dated 17/11/14 version 2 Catering facilities are provided on site by contract catering company - the staff and kitchen was seen to be clean and well maintained.

4.9 Chemical and physical product contamination control

Raw material handling, preparation, processing, packing and storage areas

Facilities and procedures were seen to be in place to control the risk of chemical or physical contamination of the product.

4.9.1 Chemical control

Chemical controls were seen to be in place including an Approved Chemical spreadsheet, safety data sheets for chemicals in use, confirmation of suitability for food use and avoidance of strongly scented chemicals. Food Safety Data Sheets were seen for chemicals in use during the factory tour for Food Lube dated 22/11/11 and for Food Care Degreaser dated 5/1/16. Chemicals were stored locked in designated areas - however three containers of chemicals were not stored securely in the amenity area at the Staithes Road Warehouse (N/C).

4.9.2 Metal control

There are knife and metal implement controls in place including knives and scissors. Records of issue and control of knives and blades seen on the factory tour were seen for: Knife issue # 23 Food Service Pack-R issued 9/5/16; Knife issue #6 Bakery Services issued 9/5/16 and AAK-FS-936 dated 14/7/14 issue 1. Ingredients and packaging are purchased without staples. Staples, paperclips and drawing pins are



not permitted to be used in open product areas.

4.9.3 Glass, brittle plastic, ceramics and similar materials

There is a Glass and Clear Hard Plastic Policy in place dated 24/6/14 issue 2 which sets our requirements for control and prevention of breakage of glass and hard plastics in the factory. The policy includes requirements for inspection of glass and hard plastic items based on the Glass, Brittle Plastics and Ceramics Risk Assessment - 2015 dated 25/11/15 which includes all areas of the factory. There is a Glass Breakage Procedure - Glass Bottles P31a dated 5/2/16 issue 2 which includes requirements in the event of a glass breakage occurrence to include quarantine of product, inspection and release of the areas and recording of the breakage incident. Records of glass and hard plastic audits were seen for Flaking AAK-QA-1473 dated 4/4/15 issue 10 with records seen for 19/1/16, 26/2/16 and 14/3/16.

4.9.4 Products packed into glass or other brittle containers

Glass bottles were seen to be stored separately from raw materials, products and packaging. There is a procedure in place for Glass Control - Bottling Dept dated 5/2/16 issue 2 which sets out systems to prevent and manage glass breakages in the bottling area. There is a Glass Breakage - Glass Bottles P31a dated 5/2/16 issue 2 and Record of Glass Bottle Breakage Report dated 5/2/16 issue 1 which set out requirements for procedures to be followed and records to be maintained in the event of a glass breakage.

4.9.5 Wood

There is a P10 Wood Policy in place dated 4/11/13 issue 1 which sets out areas where wood is permitted to be handled on site.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Foreign body risk assessment has been conducted as part of the HACCP plan and controls include: Metal detection and filtration. The metal detection and filters were seen to be suitably located and were tested at an appropriate frequency either based on risk assessment or on customer requirements. Any foreign body finds are inspected and investigated by the site Technical department.

4.10.2 Filters and sieves

Filter sizes are set out in the procedure P41 CCP Checking - Filters dated 8/4/14 issue 4 - the implementation of this was observed during the factory tour in the Foodservice area and checks were seen to be carried out hourly and to the filter sizes specified in the HACCP plan. Material retained on the sieves is inspected and recorded to identify any contamination risks. Filters are inspected and checked daily as part of the site CCP check procedures. Filter checks were observed during the factory tour for the Food service Area for CCP Buffer Tank 1 GAF dated 11/5/16 and for the Bakery Services Area and were seen to correspond the filter sizes set out in the HACCP plan.

4.10.3 Metal detectors and X-ray equipment

Requirements for metal detection are set out in the procedure P34 Metal Detection Procedure - Belt Stop Metal Detectors dated 12/2/16 issue 3.2. The procedure includes responsibility for equipment testing, checks for operational effectiveness, frequency of checks undertaken and records required. Metal detection checks were observed in the 12.5kg Fat block produced in the Food Service area during the factory tour - test piece sizes in use were seen to be those set out in the HACCP plan.



4.10.4 Magnets

There are no magnets in use on site.

4.10.5 Optical sorting equipment

There is no optical sorting equipment in use on site.

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

Procedures are in place to check cleanliness of glass bottles in use in the bottling area. Air blowing of inverted bottles is a CCP check in the area - this was observed during the factory tour and was seen to be operating in line with the air pressure set out in the HACCP plan. Records of checks of glass bottle cleanliness were seen on line for Toasted Sesame Oil which was in production.

4.11 Housekeeping and hygiene

The site and equipment was seen to be maintained in a clean and hygienic condition. Cleaning procedures are in place and were reviewed for the Foodservice area with cleaning procedures and corresponding records reviewed for the period April to May 2016. These were seen to be satisfactory and included responsibility for cleaning, item or area to be cleaned, frequency (daily, weekly, monthly) and chemicals/cleaning methods to be used. There are no high care or high risk areas on site. Weekly cleaning procedures and records along with staff training records were seen for external warehouse and were reviewed for the period January to May 2016. Equipment is visually inspected prior to release back into production - equipment not in use in the Bakery Fats area was observed to be clean awaiting re-use. Resources for cleaning were seen to be available including large items of equipment. Cleaning equipment such as brushes and small items were seen during the factory tour and were seen to be hygienically designed and suitable for use. These were stored off the floor on colour coded shadow boards depending on use e.g. for food contact use, for floor use etc.

4.11.7 Cleaning in place (CIP)

There are no CIP systems in place on site.

4.12 Waste / waste disposal

Waste disposal is subcontracted to a third party - Waste Wise who are licensed with registration number CB/TE5484JZ expiry date 13/3/17. External waste containers were seen to be managed satisfactorily with segregated waste streams in place. Spent earth from the deodorisation process is sent for use in construction materials. Unsafe or substandard trademarked product is disposed of under site control and is not sent to any third party for destruction or disposal.

4.13 Management of surplus food and products for animal feed

There is a procedure in place - 4.13 Management of Surplus Food and Products for Animal Feed dated 31/3/16 issue 1. No products are supplied for animal feed. Surplus products can be sold to Company Shop and Community Shop with approval email to brand owner dated 9/9/15 however this is undertaken rarely.

4.14 Pest Control

Pest control is sub contracted to third party (Ecolab) with contract in place numbered 614P/7990/1 and a Schedule of Visits 2016 dated 7/12/15. Ecolab are members of British Pest Control Association with certificate number M28/15/322 with expiry date 27/2/17 and with training records on file for Service Specialist BPC Diploma Part II dated 20/10/07 and for Biologist Accredited Technician in Pest Control dated 14/4/15. The site does not undertake any pest control. Site plans were seen to be in place for: External Monitoring Points dated 25/2/16, EFK Monitoring Points dated 3/6/15, South Refinery and Engineering Monitoring Points dated 26/2/16, Food Service Ground Floor Monitoring Points dated 26/2/16, Canteen/1st Floor Bakery Monitoring Points dated 26/2/16, North Refinery and Associated Building Monitoring Points dated 26/2/16, Roof Voids Monitoring Points dated 26/2/16, Distribution/Speciality Oils Internal Monitoring Points dated 26/2/16 and Dock Warehouse Monitoring Points dated 26/2/16. For the external warehouses there are Earls Road External Warehouse Monitoring Points dated 18/5/15 and Ferndale Internal Monitoring Points dated 18/5/15. Also Staithes Road External Monitoring Points dated 18/5/15 and Staithes Road Internal Monitoring Points dated 18/5/15. All baits are non-toxic unless there is justification for toxic baits on external bait points. Service records were reviewed for routine pest inspections dated 6/5/16, 22/4/16, 8/4/16, 22/3/14 with pest control recommendations and actions being seen to have been actioned and complete. The latest Biologist visit was undertaken on the 19th and 26th February 2016 with all recommendations and actions closed. Pest control training was undertaken on the 29/4/16 by the Pest Control Biologist. Pest trend analysis is undertaken by the Biologist during quarterly visits and the site is able to produce trend graphs on a monthly basis. The records were reviewed for external rodent and internal rodent monitors for the period May 2015 to May 2016 and for insects on a quarterly basis. Bait numbers 4, 5, 135 and 29 were observed in the factory and were seen to be correctly identified on the pest control plan.

4.15 Storage facilities

There are procedures in place to ensure that product safety and quality is maintained during storage including transfer between the site and the two external warehouses at Earls Road and Staithes Road. There is no requirement for refrigeration or freezing temperature control but some products are maintained at 15°C for quality purposes. Packaging is stored away from raw materials and finished products including segregation of glass bottles for the speciality oils area. Temperature control is not required for food safety. There is no requirement for controlled atmosphere storage. There is no requirement for external storage. Stock rotation is in place - this was observed to be fully implemented during the factory tour.

4.16 Dispatch and transport

Transport is undertaken by a third party with Fowler Welsh. There is a service level agreement dated 1/5/15 in place and the company holds BRC Storage and Distribution certificate expiry 18/11/16 for storage and distribution of third- party owned ambient foods and consumer products. For bulk transport of oils and fats by Abbey Road Tankers, the site has audited the company and the wash facilities for road tankers used for bulk transport and all requirement for vehicle checks, maintenance, transport and security were seen to be in place. Temperature controlled transport is not used by the site.

Details of non-applicable clauses with justification

Clause reference	Justification
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4.3.4	There are no high risk areas on site
4.3.6	There are no high care areas on site
4.3.7	There are no ambient high care areas on site
4.3.9	There were no temporary structures in place at the time of the audit
4.4.4	There are no high care or high risk facilities on site
4.4.14	There are no high risk areas on site
4.5.3	There is no water in use on site which is considered to be non-potable
4.7.5	There are no high risk or high care areas on site
4.8.4	There are no high risk areas on site
4.8.5	There are no high care areas on site
4.10.4	There are no magnets in use on site
4.10.5	There is no optical sorting equipment in use on site.
4.11.3	There are no high care or high risk areas on site
4.11.7	There are no CIP systems in place on site.
4.12.3	Unsafe or substandard trademarked product is disposed of under site control and is not sent to any third party for destruction or disposal
4.13.3	No products are supplied for animal feed
4.14.3	The site does not undertake any pest control.
4.15.3	Temperature control is not required for food safety



4.15.4	There is no requirement for controlled atmosphere storage
4.15.5	There is no requirement for external storage
4.16.3	Temperature controlled transport is not used by the site

5. Product control

5.1 Product design/development

There are guidelines in place for NPD - P43 dated 4/11/13 issue 1 which set out restrictions to the scope of new product development e.g. new allergens, packaging formats etc. New products are subject to an NPD Stage and gate process and allergens, accreditations and customer requirements are considered at the Project Scoping stage. Records were seen for retailer brand Cold Pressed Rapeseed Oil dated 9/1/16. There is a Trial Proposal Dev 01 dated 2/12/11 issue 0.2 which includes HACCP review and Specification review prior to trial - this was seen for documents in place for Flaxseed Oil and Rapeseed Oil. Shelf life is based on historic information unless there is a new product e.g. for new oil blend Flaxseed Oil and Rapeseed Oil which was assessed for shelf life on the 17/3/15 to 5/5/15 using chemical measures and organoleptic assessment to replicate customer use e.g. for this product for a bakery application.

5.2 Product labelling

Products were seen to be labelled to meet legal requirements except for outer case label for Toasted Sesame Seed Oil which was seen to state Country of Origin as Canada but the product label stated Mexico which is the correct country of origin. (NC) Label information is generated by the NPD team who use the services of importer and distributor for the country of origin to cross check any non-UK product labels. The company also has access to Campden BRI or Leatherhead for any additional label checks which are required. Labels are created for AAK brand to brand manager guidelines through the AAK Artwork Approval Database with version controls for amendments. For each version change for label there is a BOM change which creates a new label code number. This code is printed onto the label and is checked on line. There are no AAK brand products with a nutrition claim, where customer claims are made the parameters are agreed in the specification. For customer labelling systems, labels are created via same system and transferred to customer pack copy and specification system.

5.3 Management of allergens

There is a detailed Allergen Risk Assessment in place dated 8/4/16 version 7 which includes raw material and supplier information linked to the raw material specifications. The site handles Nuts, Peanuts, Sesame, Fish, Milk, Soya, Gluten and Sulphur Dioxide. The Risk Assessment set out requirements for control of cross contamination including consideration of the physical state of the allergenic material, identification of potential areas of cross contamination, and any controls required to reduce or eliminate the risk of cross contamination. Allergen control procedures are incorporated into the work instructions for each area to include physical segregation or flushing of oils between allergens, time segregation by production of allergen products and waste handling controls. Re-work is undertaken within the same batch to ensure that there is no potential for allergen cross contamination. Warnings are in place for products where cross contamination cannot be avoided - this is included on the product specification and

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on the product label. There are no products where a claim is made regarding the suitability of a food for an allergy or food sensitivity sufferer. Validation is in place for allergen cross contamination risks and controls - this was reviewed for the speciality oils allergenic oils - testing is undertaken - however allergen limits on intake below limits of detection from analysis e.g. for nuts, sesame, wheat germ oil and sesame low levels of protein below limits of detection. A marker oil (MCT) is used instead to validate the standard flush cleaning procedures between oils - this was last undertaken on the 11/12/13 and re-validated 15/12/14 and again on the 25/1/16.

5.4 Product authenticity, claims and chain of custody

There is a P68 Raw Material Vulnerability Risk Assessment in place dated 3/5/16 issue 2 which sets out the means by which the site keeps up to date with horizon scanning. The site has undertaken a Raw Material Vulnerability Risk Assessment - consideration given to fraud from origin, previous incidents e.g. for olive oil, substitution of oils such as allergens e.g. replacement of expensive nut oils with cheaper alternative such as ground nut oils. There are mitigation programmes to avoid fraud such as fatty acid profiles, supplier approval and trace exercises, certificates of analysis and certificates of conformance.

The site holds a number of third party certificates to support product claims:

Halal Authentication Certificates - Halal Food Authority certificate expiry 16/1/17

Halal Feed and Food Inspection Authority certificate expiry date 31/12/16

Soil Association - Organic Certificate - licence number PP966 certificate expiry date 31/3/17

BM Trada - RSPO registration number - 2000104000000 - certificate expiry date 3/4/17

Kosher - Manchester Beth Din - certificate expiry date 1/1/17

Non GMO - Food Chain ID - Non GMO Project - Toasted Sesame Seed Oil label and approval date for Non GMO 9/12/14

Process flows are in place for products where claims are made and controls established in line with third party certification requirements.

5.5 Product packaging

Product packaging specifications and certificates of suitability for use for high fat applications are in use - these were reviewed during the traceability exercise and were seen to be satisfactory. Product liners for bag in box products or for fats wrapped in plastic sheeting were seen to be suitably coloured (blue) and were of sufficient gauge to prevent tearing and accidental contamination of product.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

There is a programme of chemical and microbiological testing in place for intake of raw materials, work in progress and release of finished products. This is undertaken by an onsite laboratory or for pathogen and microbiological testing by a third party laboratory. Test and inspection records are reviewed daily and trend analysis is undertaken weekly and monthly as part of the management review process. Shelf life assessment is in place.

5.6.2 Laboratory testing

Pathogen testing and microbiological testing is undertaken by a third party laboratory - Northern Hygiene Laboratories ISO 17025 certificate number 1463 with issue date 16/7/12 with scope of accreditation dated 12/1/15. There is a Chemistry Laboratory on site which holds CLAS Chemistry Laboratory Accreditation valid to 30/9/16 and with a scope including Acidity, Peroxide, Fatty Acid and Iodine testing. The laboratory is located, designed and operated to eliminate risks to product safety - the laboratory is located in a separate building with segregated drainage, access, personnel controls etc. Where chemistry tests cannot be undertaken on site, they are subcontracted to third party laboratories holding ISO 17025 certification: SGS Institut Fresenius - Laboratories - D-PL-14115-03-00 - Berlin, Berlin and Hamburg certificate issue date 18/11/10 with scope of accreditation listed on certificate, Alex Stuart Agriculture Ltd 4352 certificate issue date 29/8/12 with scope of accreditation dated 5/5/16 and Beverley Analytical Laboratories Ltd 1932 certificate issue date 19/3/14 with scope of accreditation dated 23/11/15. For testing undertaken on site, procedures are in place for proficiency testing. This includes testing undertaken as part of the CLAS accreditation process. The site also participates in the FAPAS Food Chemistry proficiency testing scheme with latest round robin testing undertaken for Olive Oil dated 23/2/16. Additional quarterly proficiency testing is undertaken with sister sites in conjunction with external laboratory SGS Institute Kirchoff for heavy metals, PCB and mineral oil testing.

5.7 Product release

Oil is released into the bulk tanks on intake and is released according to customer specification parameters prior to despatch. Intake consignments of bulk oil received 10/5/16 were seen to be released at 11:30pm 10/5/16 to tanks D3/C6 and to tanks D1/D2 and D4. Intake was released against Incoming Oil Specification AAK-LB-1041 dated 18/5/15 version 1. Finished product release was seen for Akofluid IS SG batch code 0959E against specification dated 8/5/16.

Details of non-applicable clauses with justification

Clause reference	Justification
5.3.7	There are no products where a claim is made regarding the suitability of a food for an allergy or food sensitivity sufferer.

6. Process control

6.1 Control of operations

Documented procedures, work instructions and specifications are in place to ensure product safety, legality and quality - these were seen to be in place during the factory tour, as part of the traceability exercise and were included in the document review. Process specification was checked against the finished product specification as part of the traceability exercise and the two documents were found to be aligned. Process monitoring such as temperature, time etc. were reviewed during the factory tour and were observed for the South Refinery and North Refinery - where processes such as deodorisation and hydrogenation are in place and are controlled by in-line monitoring these were seen to have failure alarms and electronic flags in place to highlight to plant operators where variations have occurred. There is no equipment in place where variation within equipment is critical to safety or quality of product. Procedures are in place to set out actions to be taken in the event of equipment failure or deviation from process specification.

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6.2 Labelling and pack control

There is a procedure P70 Labelling, Pack Control and Line Clearance Procedure in place dated 19/4/16 version 1 which sets out requirements for removal of packaging from production lines between products. Product changeover observed for Fry Pure Palm Oil to Prep Vegetable Oil Blend and was seen to be satisfactory. Documented checks of the production line are carried out before commencing production and after changes of product - a label check was seen to be in place for retail brand Toasted Sesame Oil LAB 10122 - this was checked against the specification and found to be the correct version. However, labels from previous run of retail pack of oil spray were left on line 2 in the Speciality Oils Area.(N/C)The label checks include checks at the start of packing, during the packing run, when changing batches of labels and at the end of the production run. Checks are in place for dated code and batch code printing and labelling and a label date change was observed for Crestawhip dated BBE 8/8/16 - this was seen to be in line with approved specification dated 10/5/16. The site does not use on-line vision equipment.

6.3 Quantity, weight, volume and number control

There is a procedure P21a Quantity Control - Average & Minimum Weight Legislation Bottling in place dated 18/8/15 issue 1 which sets out requirements for retail and bulk product weigh checking. Line start up check observed for Crestawhip bulk container with weigh tare and check weighed filling process seen to be satisfactory.

6.4 Calibration and control of measuring and monitoring devices

There is a procedure P45 Calibration in place dated 14/8/15 issue 3 which sets out requirements for control and calibration of equipment used to measure critical control points, product safety or legality. The procedure includes requirements for actions to be undertaken where equipment is found to be outside of specified limits. There is a Calibration Master Spreadsheet in place which lists all items for calibration. The following items were observed during the factory tour and calibration certificates seen to be in place as follows:

Glass Bottle Air Pressure Gauge 1523/18 dated 7/9/15
 Glass Bottle Air Pressure Gauge 12112119 dated 7/9/15
 Metal Detector Calibration 47587/1 dated 13/7/15
 100g Weight SP1 dated 18/4/16
 200g Weight B448300018 dated 18/4/15
 Scales 130150185 dated 11/5/16
 Scales - Bakery Services 130450197 dated 21/4/16
 Scales - T14093331 dated 6/4/16

The equipment in use was seen to be of a suitable accuracy for the measurements being undertaken. The calibration certificates were seen to be traceable to recognised national or international standards.

Details of non-applicable clauses with justification

Clause reference	Justification
6.1.4	There is no equipment in place where variation within equipment is critical to safety or quality of product.



6.2.4	The site does not use on-line vision equipment.
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7. Personnel

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

There is a P32 Training Policy in place dated 29/1/16 issue 5 which sets out requirements for all staff to be appropriately trained prior to commencing work and to be adequately supervised. Personnel who undertake critical control point checking are trained against CCP procedures. There is a training matrix in place for all members of staff which identifies the training required for their job role. All staff including engineers and temporary staff receive allergen awareness training. Training records were seen for operators listed below and the records were seen to include the details of the trainee, date and duration of training, title or course information and the training provider. Training includes competency checking.

Operators were selected at random during the factory tour and training records seen for:

Operator A
 CCP Training dated 6/4/16
 Food Safety Training dated 22/4/16 (includes Allergen Awareness)
 Food Safety Policy Training dated 22/4/16

Operator B
 CCP Training dated 12/4/16
 Food Safety Training dated 18/4/16 (includes Allergen Awareness)
 Food Safety Policy Training dated 18/4/16

Operator C
 CCP Training dated 3/3/16
 Food Safety Training dated 26/4/16 (includes Allergen Awareness)
 Food Safety Policy Training dated 18/4/16

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

There is a procedure P09 Personal Hygiene and Protective Clothing Standards in place dated 17/6/14 issue 2 which sets out requirements for personnel controls for jewellery, nails and perfume. There is a Hand Washing Procedure in place SOP 7.2 dated 20/11/14 issue 1 - staff were observed to wash hands during the factory tour. Blue plasters are issued as needed by the site and Blue Plaster Metal Checks records R52 dated 29/10/14 issue 1 are in place with plaster metal detection check records seen for 2014 and 2015. There have been no plaster deliveries to date in 2016. There is also a P52 Plaster Control procedure in place dated 11/12/13 issue 1 which sets out controls for issue and use of blue plasters. P09 Personal Hygiene dated 17/6/14 version 2 includes restrictions on use of personal medicines, however, personal medicine (Cold/Flu Remedy) was found in the North Refinery Production Office (NC)

7.3 Medical screening

There is a procedure P09 Personal Hygiene and Protective Clothing Standards dated 17/6/14 issue 2 which sets out overall requirements for medical screening including guidance for employees for symptoms of infection, disease or controls required. There is a procedure for visitors and contractors detailed in the P14a Visitor/Contractor Questionnaire dated 5/4/16 issue 4. For employees who may be suffering from or who may be in contact with an infectious disease, there is a Return to Work Interview Guidance V3 2015 which includes Food Safety Questions and requirements for authorisation to return to work. Reference may be made to the FSA Food Handlers Fitness to Work document guidance or referred to

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Occupational Health Services provided via ABP.

7.4 Protective clothing: employees or visitors to production areas

There is a procedure P09 Personal Hygiene and Protective Clothing Standards in place dated 17/6/14 issue 2 which sets out requirements for protective clothing. Protective clothing was seen to be available and in use according to the procedure. Laundry is via Johnson Apparel Master with approval based on Customer Information Pack issue 42 dated 31/3/16. Protective clothing is changed daily. Where gloves are used these are disposable blue gloves. There are no items of protective clothing which are not suitable for laundry.

Details of non-applicable clauses with justification

Clause reference	Justification
7.4.4	There are no high care or high risk processes on site
7.4.7	There are no items of protective clothing which are not suitable for laundry