



Audit Report

Global Standard for Food Safety Issue 7: July 2015

1. Audit Summary			
Company name	OPFH Frugalia S.L.	BRC Site Code	1473355
Site name	Tany Nature SA		
Scope of audit	Post Harvest treatments, washing, sorting, grading and packing of stone fruit and top fruit (plum, nectarine, peach, flat peach, flat nectarine, apricot), Sorting, grading and packing of top fruits (pear), quince and asparagus in cavity trays, plastic bags, flow pack, cardboard /plastic boxes and meshes. Tratamientos pos cosecha, lavado, selección, clasificación y envasado de frutas de hueso (ciruela, nectarina, melocotón, paraguayo, platerina, albaricoque, pera y membrillo). Selección, clasificación y envasado de fruta de pepita (Pera), membrillo y esparrago. Envasados en alveolos, bolsas de plástico, flow pack, cajas de cartón / plástico y mallas.		
Exclusions from scope	None		
Justification for exclusion	NA		
Audit Finish Date	2018-07-24		
Re-audit due date	2019-08-29		

Voluntary modules included		
Modules	Result	Details

2. Audit Results					
Audit result	Certificated	Audit grade	A+	Audit type	Unannounced option 1
Previous audit grade	A	Previous audit date	2017-08-29		

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Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	8

3. Company Details			
Address	C/ Camino General, 1, Zurbarán, Badajoz		
Country	Spain	Site Telephone Number	0034 924 856 096
Commercial representative Name	Juan Barroso	Email	jbarroso@tany.es
Technical representative Name	Francisco Manuel Agud	Email	fagudo@tany.es

4. Company Profile					
Plant size (metres square)	>25K m2	No. of employees	51-500	No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	GLOBALGAP				
Regions exported to	Asia South America Europe Oceania				
Company registration number	21.19933/BA				
Major changes since last BRC audit	New Meshes equipment. Security Guards				

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4. Company Profile

Company Description

The company is a family owned business specialising in fresh stone and top fruit production and export. Fruit is sourced from own production and third party purchasing from approved certified suppliers (all of them GG certified). The company has an extensive export portfolio shipping to some 33 countries, in the EU, south America, and Arab countries and Asia. The season commences in March and finishes in December. Situated in the rural area of Zurbaran, the packhouse, built in 2003 and extended on two occasions. Changes: New meshes equipment. The packhouse covers some 40.000m², with a production area of 22000m² and a cold storage capacity of 19000m². There are in total 36 product lines and 18 cold stores. The total number of employees reaches 350 in the peak season working shift, of which there are two per day. The site Spanish Hygiene registration number is 21.19933/BA and has one generic HACCP study. The production usually is about 52 Million Kg. No recalls in the last 12 months. The person responsible in the event of recall of the product is the Quality Manager Francisco Agudo, phone; +34 627 47 85 85, fax: 924856241 mail fagudo@tany.es. The company is in unannounced program audit. Start Audit: 10:30, Facilities visit: 11:00.

5. Product Characteristics

Product categories		05 - Fruits, vegetables and nuts			
Finished product safety rationale		Raw, whole fruit; chilled storage and distribution (0-3°C); natural acidity (pH<4.6); post-harvest fungicide can be applied (at customer request); maximum shelf life 9 weeks			
High care	No	High risk	No	Ambient high care	No
Justification for area		Low Risk as per BRC decision tree, raw whole fruit which does not support the growth of pathogenic bacteria			
Allergens handled on site		None			
Product claims made e.g. IP, organic		GLOBALGAP			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Plum, nectarine, flat peach on different formats (Cardboard boxes, plastic boxes, meshes, cavity trays)			

6. Audit Duration Details			
On-site duration	18 man hours	Duration of production facility inspection	9 man hours
Reasons for deviation from typical or expected audit duration	Agreed reduction in duration due to simple process and similar products		
Next audit type selected	Unannounced 1		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1	2018-07-23	10:30	20:30
2	2018-07-24	08:30	16:30

	Auditor(s) number(s)	Names and roles of others
Auditor Number	207195	Javier Cuco

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	Closing Meeting
	Francisco manuel Agudo/Quality Manager	X	X	X	X
Pedro Serrano Palacios/General Manager	X			X	

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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 document, photograph, visit/other	Date reviewed	Reviewed by
1	4.3.4	There are some plastic boxes directly in contact with the ground in the manual packing area. There is no clear segregation between intake and final product in the area of manual packing (Field boxes are placed directly on the packing tables) There are no food risks Se observan algunas cajas plásticas apoyadas directamente sobre suelo en el área de envasado manual. No hay una clara segregación de producto recepcionado y producto final en el área de envasado manual (Las cajas de campo se apoyan directamente sobre las mesas de envasado) No hay riesgos alimentarios	Carry out the manual works exclusively in the areas designated and equipped for that purpose, to avoid the lack of segregation and the presence of containers that touch the ground. Realizar los trabajos manuales exclusivamente en las áreas designadas y equipadas al efecto, para evitar la falta de segregación y la presencia de envases que toquen el suelo..	The nonconformity is due to an unusual work situation. The machine that was being made is not designed, nor equipped for this type of work. The order of yellow plum that was assigned had to be processed manually due to the advanced maturity of the field product (which did not support the passage through the calibrator). As this order was also urgent and the process area was occupied, it was decided to improvise with field boxes and boards a manual work zone, situation totally unusual, where product segregation is not respected in the manual work zones enabled. for it. La no conformidad se debe a una situación de	Segregación en trabajos a mano;Acta de Reunión con acuerdo sobre AACC	2018-08-20	JCUCO

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				<p>trabajo inusual. La máquina por la que se estaba realizando no está diseñada, ni equipada para este tipo de trabajos. El pedido de ciruela amarilla que tenía asignado tuvo que procesarse a mano debido a la madurez avanzada del producto de campo (que no soportaba el paso por el calibrador). Como además este pedido urgía y el área de procesos a mano estaba ocupada, se optó por improvisar con cajas de campo y tableros una zona de trabajo manual, algo totalmente inusual, donde no se respetó la segregación de producto en las zonas de trabajo manual habilitadas para ello.</p> <p>Commitment by the management and training minutes with those responsible for planning the tasks with sufficient advance. The</p>			
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				<p>report includes the designated equipment and the obligation to check the condition of the fruit before packaging to avoid improvisation.</p> <p>Compromiso por la dirección y acta de formación con los responsables de planificar las tareas con antelación suficiente. El acta incluye los equipos designados y la obligación de comprobar el estado de la fruta antes del envasado para evitar improvisaciones.</p>			
2	4.4.3	<p>There are puddles of water under the box washing machine. One of the drains is not completely protected (Under Wash Basin) Hay charcos de agua bajo la lavadora de cajas. Uno de los desagües no está completamente protegido (Bajo Balsa Lavado)</p>	<p>Charcos Bajo Lavadora de Cajas: Se comunica incidencia a Mantenimiento. Se repara el filtro Desagüe no protegido: Se vuelve a colocar la tapa en su lugar. Se habilita cartelera de aviso para evitar que alguien vuelva a retirarla.</p>	<p>Charcos Bajo Lavadora de Cajas: Obstrucción de filtro de cubeta de drenaje Desagüe no protegido: Se retiró la tapa para facilitar la evacuación de agua</p> <p>Charcos Bajo Lavadora de Cajas: Se incluye el filtro de la cubeta en el Plan de Mantenimiento Preventivo. Desagüe no protegido: Se habilita cartelera de</p>	<p>AACC Desagüe no protegido;AACC Charcos lavadora de cajas</p>	<p>2018-08-20</p>	<p>JCUCO</p>

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				aviso. Se incluye este punto en inspecciones de riesgos laborales para confirmar la eficacia de las medidas adoptadas.			
3	4.5.2	The water plan does not include the wash tanks (recirculated water). El plano de aguas no incluye las balsas de lavado (Agua recirculada).	Request ARRAM (engineering) to include water rafts as a point of water consumption Solicitar a ARRAM (la ingeniería) que incluya las balsas de agua como punto de consumo de agua	<p>The wash basins are of recent installation and are still in the check-up phase. The available plans date from the last extension (2017). Las balsas de lavado son de reciente instalación y todavía están en fase de chequeo. Los planos disponibles datan de la última ampliación (2017).</p> <p>Draft a new water plan that includes the new rafts. For operational reasons, the wording of this new Plan will be made once the campaign is over. Redactar un nuevo plan de aguas que incluya las nuevas balsas. Por razones operativas, la redacción de este nuevo Plan se realizará una vez terminada la</p>	Nuevo plano de aguas de instalaciones personal; Nuevo Plano de Aguas de la central (vista general); Nuevo Plano de Aguas Central. Detalle Balsas	2018-08-20	JCUCO

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				campaña.			
4	4.9.5.1	There are some structural elements of wood. There is no documented control over these elements. A splinter is observed under the pre-grading line. There are no food risks (The area is not for final packaging). Hay algunos elementos estructurales de madera. No se documenta un control sobre estos elementos. Se observa una astilla bajo la línea de pre calibrado. No hay riesgos alimentarios (El área no es para envasado final).	Immediately include these structural elements within the revisions of the Preventive Maintenance Program. Incluir de modo inmediato estos elementos estructurales dentro de las revisiones del Programa de Mantenimiento Preventivo.	Some structural elements of wood have not been considered within the periodic Inspection Plans: Caliber cars, floors of control booths ... As indicated, although it does not suppose, for the moment, any type of food risk, they result in everything case structural elements not controlled. No se han considerado dentro de los Planes de Inspección periódicos ciertos elementos estructurales de madera: Carros de calibrador, suelos de cabinas de control... Como se indica, aunque no suponga, por el momento, ningún tipo de riesgo alimentario, resultan en todo caso elementos estructurales no controlados. Periodic reviews within the Preventive Maintenance Program	Registro de los elementos de madera no controlados dentro de Plan Mantenimiento;Revisión de Elementos Estructurales de Madera	2018-08-20	JCUCO

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				Revisiones periódicas dentro del Programa de Mantenimiento Preventivo			
5	4.11.1	Disorder was observed in one of the areas: Intermediate zone "Between cold Stores and packaging area" (waste fruits pallots, poorly stacked boxes) Se observó cierto desorden en una de las áreas: Zona intermedia "Entre cámaras de frío y zona de envasado" (Pallots de destrío de fruta, cajas mal apilada)	Relocate those materials in the current materials warehouse and clear the area. The non-conformity was reported to the Directorate that has authorized a budget line for the construction of the auxiliary materials warehouse at the end of the 2018 campaign. Reubicar esos materiales en el almacén de materiales actual y despejar la zona. Se comunicó la no conformidad a la Dirección que ha habilitado una partida presupuestaria para la construcción del almacén de materiales auxiliares a la finalización de la campaña 2018.	In that area the construction of a warehouse of auxiliary materials for the present campaign was planned. The work could not be done in time and that area remained unfinished although the materials that were originally thought to be stored in the failed warehouse were located there. En esa zona estaba prevista la construcción de un almacén de materiales auxiliares para la presente campaña. La obra no pudo realizarse a tiempo y esa zona quedó sin cerrar aunque se ubicaron allí los materiales que originalmente se pensó guardar en el fallido almacén. Projected materials warehouse	AACC Desorden en zona intermedia	2018-08-20	JCUCO

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				construction Construcción del almacén de materiales auxiliares proyectado			
6	5.6.1.1	The frequency of post-harvest analysis was not defined (last Scholar analysis May 2017) La frecuencia de análisis post cosecha no fue definida (ultimo análisis de Scholar mayo 2017)	New wording of the Control Plan for LMRs of the company where post-harvest applications are included and where their frequency of analysis is defined. Sampling of product subjected to post-harvest applications to determine the presence of active materials used in post-harvest. Nueva redacción del Plan de Control de LMRs de la empresa donde se incluyan las aplicaciones postcosecha y donde se defina su frecuencia de análisis. Toma de muestras de producto sometido a aplicaciones postcosecha para determinar la presencia de materias activas utilizadas en postcosecha.	There is an LMR control plan that applies exclusively to field products but omitted to include post-harvest applications. Although it was known that the standard required at least one sample of post-harvest pesticides, this indication was considered sufficient and was not considered to be expressly included in the MRL Control Plan. Existe un plan de control de LMRs que se aplica exclusivamente a producto de campo pero se omitió incluir en el mismo las aplicaciones postcosechas. Aunque se conocía que la norma exigía al menos una muestra de pesticidas	Analítica de Nectarina con destino a Sudáfrica (tratada con fludioxonil);Analítica de Sweet Dream con destino a Brasil (tratada con fludioxonil);Analítica de Black Egg con destino a Brasil (tratada con fludioxonil);Nuevo Programa de Control de LMRs con inclusión de las aplicaciones postcosecha	2018-08-20	JCUCO

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				<p>postcosecha, esta indicación se consideró suficiente y no se consideró que debiera figurar expresamente en el Plan de Control LMR.</p> <p>Application of the New MRL Control Plan Aplicación del Nuevo Plan de Control de LMRs</p>			
7	5.6.2.3	The heavy metal tests carried out at an external lab were not accredited to ISO17025. Los análisis de metales pesados no son acreditados 17025.	Perform the next heavy metal analytics collected in the Sampling Plan in a laboratory accredited with ISO 17025. Realizar las próximas analíticas de metales pesados recogidas en el Plan de Muestreo en laboratorio acreditado con ISO 17025.	The requirement of the rule that refers to the obligation to use accredited laboratories for those control points that concern food safety and / or food legality was misinterpreted. In this case, the presence of heavy metals was not considered a CCP, but, as evidenced during the audit, it should be considered as a legal requirement since there is legislation in this regard on our product. Se malinterpretó el requisito de la norma que alude a la obligatoriedad de	Análítica Metales Pesados Ciruela;Análítica Metales Pesados Nectarina	2018-08-20	JCUCO

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				<p>utilizar laboratorios acreditados para aquellos puntos de control que atañan a la seguridad alimentario y/o legalidad de los alimentos. En este caso, la presencia de metales pesados no se consideró un PCC, pero, según se evidenció durante la auditoría, si debe ser considerado como un requisito legal puesto que existe legislación al respecto sobre nuestro producto.</p> <p>Require the company with which the sampling is subcontracted that in the future heavy metal samples are sent to laboratories certified by ISO 17025. Exigir a la empresa con la que se subcontrata la toma de muestras que en lo sucesivo las muestras de metales pesados se envíen a laboratorios certificados por la ISO 17025.</p>			
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8	7.4.1	<p>Personnel clothing is observed in the packaging area (Jackets). Se observa ropa del personal en la zona de envasado (Chaquetas).</p>	<p>Drafting of a new hygiene standard that expressly refers to the prohibition to introduce clothing in the packaging area. HR will be asked to include it in the future training of workers and will be distributed on the boards of the plant. Reinforcement signage that expressly refers to the prohibition of personal clothing in the production areas on the racks distributed by the packaging areas. Redacción de una nueva norma de higiene que haga alusión expresa a la prohibición de introducir ropa en la zona de envasado. Se solicitará a RRHH para que la incluya en la formación futura de los trabajadores y se distribuirá en los tableros de la central. Cartelería de refuerzo que haga alusión expresa a la prohibición de ropa personal en las zonas de producción en los percheros distribuidos por las áreas de envasado.</p>	<p>Although in the Hygiene Rules expressly refers to the obligation to wear uniform and the prohibition to introduce personal items and workers sign the acceptance of these standards when joining the position, the fact of not referring to those objects expressly to clothing, may have led to misinterpretations about this point by employees and supervisors. Si bien en las Normas de Higiene se alude de forma expresa a la obligatoriedad de llevar uniforme y a la prohibición de introducir objetos personales y los trabajadores firman la aceptación de dichas normas al incorporarse al puesto, el hecho de no aludir entre esos objetos expresamente a ropa, puede haber dado lugar a interpretaciones</p>	<p>Nueva Norma de Higiene con alusión a la ropa personal; Reportaje AACC ropa personal</p>	2018-08-20	JCUCO
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				<p>erróneas acerca de este punto por parte de empleados y supervisores.</p> <p>Inclusion of personal clothing within the check points within the Hygiene Inspections.</p> <p>Inclusión de la ropa personal dentro de los puntos a chequear dentro de las Inspecciones de Higiene.</p>			
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Comments on non-conformities
NA

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Detailed Audit Report

1 Senior Management commitment

1.1 Senior management commitment and continual improvements

The company has a documented Food Safety Policy which is signed by the General Manager Atanasio Naranjo dated on 11/03/12 and reviewed on 15/03/17, This is included in the induction programme and is displayed on notice boards throughout the facility. The policy states the company's intention to meet its obligation to produce safe and legal products to the specified quality, its responsibility to its customers and commitment for review and continual improvement. There are also a Quality, Environment, and Social Ethical Policies. Continual improvements are realised through Food Safety and Quality objectives which are set annually at the Management Review and are monitored and their progress reviewed.

Clear targets are set:

- Increase client volume.
- Reduction in incidents in air shipments.
- Prepare a protocol for claim notification for Brazil.
- Implementation of 5S system.

In addition, monthly meetings are held to handle day-to-day problems, 17.07.2018 followed by the HACCP team and including production and maintenance issues

The last Management Review meeting on 15/03/2018 was chaired by Atanasio Naranjo, General Manager and attended by The Quality staff team– A standard agenda is used covering all requirements of the BRC standard, , (example quality objectives, customer complaints, internal/external audits suppliers control, etc)

Staff is trained provided: including its regarding responsibilities'. This is followed on the management review meeting In order to keep up to date with changes in the food sector in which the site operates, and of related legislation and potential risks to authenticity, the site uses relevant websites and is member of AFRUEX (Asociación de Fruticultores de Extremadura).

The company has a BRC genuine copy available.

Verified last non conformities:

- Equipment Specification available.
- Complet Glass control documents (All areas).
- Pest control documented (All activities)
- Nutritional analysis available.
- Pesticides card for post harvest treatments responsible.
- Medicines management instructions implemented.

1.2 Organisational structure , responsibilities and management authority

The company shall have an organization chart: SGC ORG dated Sep. 15 including the organization and deputy Descriptions are documented on SGC DOC 8 April 2014, example: Expedition Quality Manager: Rosa Moreno deputy: Fran Agudo (Quality Manager), their descriptions are detailing all their responsibilities.

Substitute table is available with nominations for each post in case of absence.

There are sufficient resources to maintain and continually improve the QMS.

Details of non-applicable clauses with justification

Clause reference	Justification

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2 The Food Safety Plan - HACCP-01

The HACCP Team is led by Francisco Agudo who is trained (FEPEX, 14/11/05)).

All the Team:.

Jose Manuel Lopez: Production,
 Damasa Naranjo Gomez: Personal
 Juan Antonio Torrano: Farm,
 Joaquin Gallardo Maintenance,
 Rosa Moreno, Quality,
 Antonio Molina, traceability

The team have been internally trained on 04/03/17 HACCP studies were initiated when the 2003, and have been reviewed annually since.

The most recent review was dated on Jul 17, and the scope includes all the product and processes to be covered, example: pear, peach, asparagus. Product description and packaging format are documented individually for each product; example: plum, nectarine, peach... T°: 0,5-18 °C (depending on the produce/ process), Shelf life (e.g.: plums up to 9 weeks; nectarines between 2 and 4 weeks; all stored chilled); nutritional composition (no compulsory on labels), packing formats (including passive MAP packing for products overseas), intended used (fresh produce), legal limits (LMR´s). There is not any high risk, high care or ambient high care areas for the type of product being packed Generic legislation referenced within the HACCP study such as General Food Law EC 178/2002 Hygiene Laws EC 852/2004, EC 853/2004, 396/205, 1881/2006, plastic packaging contact regulations EC 1935/2004, RD 140/2003, water quality. There are no allergenic materials present on site and this has been evaluated in the HACCP study. Identity preserved products such as Global GAP are produced.

Process flow: raw material intake, inspection (defects, hardness, Brix°, dimensions, etc.), pre-chilling, short term storage, grading, washing with water, fungicide post-harvest application (when applicable to peaches, nectarines, plums, and flat peach using Fludioxonil), packing (packed per weight or units), palletising, labelling, pre-chilling, cold storage and despatch (chilled).

No processes are subcontracted.

The team have used a 4 step decision tree and conducted a severity vs. likelihood risk assessment to identify CCPs. Flow diagrams are in place, and those have been verified on 11/07/18 by Fran Agudo The HACCP study has considered physical, microbiological and chemical hazards.

The main hazards identified were related to the use of pesticides pre and post-harvest;

The team have used a 4 step decision tree and conducted a severity vs. likelihood risk assessment and a decision tree to identify CCPs.

No CCPs have been identified in the study; however, a number of CPs were identified:

- CP 1: Chemical contamination from pesticides. Pesticide levels above legal limits. HI incompliance. Process: Raw material intake Control measures: Pesticide applications are issued by trained Agronomist. Critical limits: MRLs / HI Monitoring system: Harvest intervals are controlled by the agronomist every batch.

- CP2: Chemical contamination from postharvest treatments. Levels above legal limits. Process: postharvest treatment Control measures: use approved doses. Critical limits: EU MRLs / Doses max according the product register specifications. Monitoring system: Daily doses checks. Residue testing programmes. Control systems already in place minimise the risk of chemical, physical and microbiological contamination.

Pre-requisite programmes identified include: Glass control, waste management control plan, traceability plan, foreign bodies control, personal hygiene procedures, housekeeping and hygiene procedures, supplier approval, water supply monitoring, pest controls, food defence and temperature control.

The site's HACCP system is verified by internal audits, analysis of spray application records, review of approved chemical and product analysis and customer feedback

Details of non-applicable clauses with justification

Clause reference	Justification
2.9.1	No CCP´s detected.
2.9.2	No CCP´s detected.
2.10.1	No CCP´s detected.
2.10.2	No CCP´s detected.

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3 Food safety and quality management system

3.1 Food safety and quality manual

The Food Safety Quality Management system covers the scope of the Global Standard for Food Safety and contains the appropriate policies, procedures and work instructions. The Quality Manual reference is SGC MAN 1 Aug 2010 referencing all the applicable processes, which was adequately implemented and operative and available to all the regarding staff.

3.2 Documentation control

The document control procedure is PRO 9 Aug. 2010, explaining the operative to control the documentation, including the procedure to ensure obsolete documentation is appropriately replaced or rescinded. There is a List updated SGC RG 18 referencing all the company's documentation and record.

3.3 Record completion and maintenance

The procedure to ensure obsolete documentation to be appropriately replaced or rescinded. Changes and amendments are recorded on the back page of procedures and on list that details any modifications. Records were reviewed throughout the assessment and were available as requested. Records are reviewed and signed at appropriate intervals. The retention period is at least 3 years.

3.4 Internal audit

Internal audits are completed by independent staff, according a documented procedure SGC PR 2 Sep 2013. The auditors is Jose M^a Barroso internal auditor course 29.02.2016 by SAI Global. The schedule of internal audits covers the Quality Management System, Management and Commitments, Crisis Management and Quality Product Realisation and has been scheduled though the year, example w18, week 19 (HACCP), w23 QMS, w30 (Process)... Last audit was carried out on 23/07/18. The report contained details of conformity and non-conformity with requirements, no incidents. In addition, verified customer audits: E.g. Process by GY w23, DPS audit (w24, available complet audit, closed non conformities)... In addition, there is a Monthly maintenance inspection, example: Facilities on SGC R-1, weekly on w-30 by Joaquin Gallardo (maintenance), including all the facilities elements

3.5.1 Management of suppliers of raw materials and packaging

SGC PRO 4 2013, explaining the operative to suppliers aproval, and rerencing HACCP Eval 3 15/03/2017; the R.A. describing the criteria to approve every type of suppliers and including the raw material hazards risks which includes allergens, chemical, physical and microbiological hazards. All Produce suppliers (most of them company partners) are requested to have GLOBAL GAP certifications. For fresh product the company is being supplied mainly by their own farms (GLOBAL G.A.P. farms (main risk chemical : pesticides controlled via GAP certifications: example:Castelnovo. Gartairo. GLOBALGAP: GGN 4050373891367 valid until September 2018. Farm Book: Last Treatment Spintor 10.06.18 HI 7 days. Harvested 26.06.2018. Analysis: AGRAMA #00024....001 on 22.06.2018, Fenbuconazol, Fluopiram, Spinosad. Accordind 396/2005. A fresh supplier approval list is available: Hispatec x64, including all the providers, example Enrique Subiran Regarding exceptions, In this case, 100% will be sampled and approved under management and technical dept. criteria. Packaging Tracebaility: - Cardboard Boxes: 40x30x9. Supplier Ondupak. Delivery note ...0313. Supplier evaluation: Ondupack. BRC IOP valid until 2019, Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place - Cavity Trays: Supplier Nespac BRC IOP valid until 15.03.2019. Delivery note I/181805. Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place

3.5.2 Raw material and packaging acceptance and monitoring procedures

Intake quality Control (PERI program): e.g. F18/2121, kgs sampled 40 kgs. A little damage by stone. 86 % good fruit. BRIX 8,6, hardness 8,7

3.5.3 Management of suppliers of services

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SGC PRO 4 2013, explaining the operative to suppliers approval, and rerencing HACCP Eval 3 15/03/2017; the R.A. describing the criteria to approve every type of suppliers and including the services hazards risks which includes allergens, chemical, physical and microbiological hazards.
 Main Risk: unauthorization.
 Example: Labs: SICA Agri Q ISO 17-025 accreditation # ENAC 493/LE 1019.
 A supplier approval list is available: Hispatec x64, including all the providers, example SICA Agri Q.

3.5.4 Management of outsourced processing and packing

n/a no processes outsourced

3.6 Specifications

Specifications for packaging materials and finished products are available. Product specifications include details of quality, allowed defects, minimum °Brix size, color, etc. Finished product specifications are provided in customer format, and are subject to customer review as required. For some of the clients, the company has access to the Specification Library where all relevant specifications are available and review is at least every three years

Specifications are reviewed periodically, by the sales department

Verified specifications:

Own Tany specification: Standard Tany, defects, color, BRIX (Minimum 9 +/- 0,5 BRIX), hardness. Reviewed 2017

There are some specifications for the training of own staff and product of farms.

Control instructions are available in intake product (according to destination). e.g long distance, Asia, South Africa

...
 Blocking in the case > 25% defects (E.g. for rotting ...)

Specifications for peaches, plums and asparagus for an UK to Brazilian and a German retailer are both reviewed and all were found to comply with requirements.

e.g. QAS Specification: Nectarine Cavity Tray (2016), BRIX > 9, Hardness 2-5 kg, temperature 2-8°C ...

3.7 Corrective and preventive actions

The company has a system in place to implement corrective and preventative actions which is used to manage Procedure PR 03 Sep. 2013 describing N.C. and C.A The records for the corrective actions include the description of the non-conformity, the root cause study and the description of the corrective action including the timing for the implementation and the verification of the implementation of the action and the signature of the person responsible for each step.

Example; 06/13/2018.

Tagged English client.

Error in marked variety.

Causes: variety authorized by customer is marked.

CCAA: Training and supervision, meetings

3.8 Control of non-conforming product

Procedure PR 03 Sep. 2013 All out of specification raw materials and products are clearly identified with a label, palletized and isolated. According this procedure all out of specification raw materials and products are clearly identified, labelled and quarantined. Designated areas for materials and products on "Hold" are clearly identified. During the site inspection there was no non-conforming product, but there were designated areas were possible non-conforming product would be stored meanwhile the investigation.

3.9 Traceability

The company has a system that enables the traceability of raw materials and packaging from source and throughout processing and finished products through distribution. The Company has new electronic traceability system in place. At arrival, each pallet is identified with a label which includes a bar code system. When the box is selected for supplying the packing line, the operator in charge reads the bar code and activates the system, and the time the box has been discharged. The system keeps the information of all the raw material boxes supplying the packing line at any time. At the end of the packing line the final product pallet is labelled with a bar code ticket

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which is activated when the first box is loaded. The traceability system is based on time and it enables the identification of all the raw material that could be present in one final product pallet. Each final product is identified with a unique serial number. The system is described in the Procedure PRE PRO 02 Aug. 2014. The system allows identifying the actual subsequent pallet in time therefore it is easy to identify where a specific raw material batch may be present. Production efficiencies are monitored.

The company undertakes traceability tests to cover raw material to finished product and finished product to raw materials (Minimum 1 / year). Mass balance calculations for raw material usage are undertaken, example 03/07/18 batch 26641 nectarine. Including packaging traceability, mass balance, controls.

The auditor chose nectarine delivered on 04/07/2018 with batch number 17305, Order 69425 to undertake a forward traceability challenge test during the audit which was completed.

Nectarine (GGN), To English Retailer (Cardboard boxes 40x30x9, cavity tray).

By Hora Dumped pallets:

Intake product: Hours of packaging. 12: 18-12.28

It is linked with dumps: From 12:07 -12: 36 (10 minutes before and 10 minutes later)

Intake product: PAF 18/53359 (213 kgs). Intake product (26.06.2018) F18/2121 18755.

Mass balance quantities were accurate for the total of delivered income and outcome, Intake product 693000 kg , Delivered 594000 kgs

Wastes: 99000 kgs. 14,3% (on the average of the company).

CP were verified: CP1: Supplier: Castelnovo. Gartairo.

GLOBALGAP: GGN 4050373891367 valid until September 2018.

Farm Book: Last Treatment Spintor 10.06.18 HI 7 days. Harvested 26.06.2018.

Analysis: AGRAMA #00024...001 on 22.06.2018, Fenbuconazol, Fluopiram, Spinosad. Accordind 396/2005.

CP2 was verified on during the audit: There was no application of Fludioxinil in the selected packaging, despite this, Fludioxinil was applied in other packages.

E.g. 04.07.2018, Packaging Line 2A, Miguel Parejo, Product Scholar (Fludioxinil 23%), Dosage 300cc / 100 L, 120 ltrs, 36000 kgs (<1 L / 1000 kgs).

Pesticide Card: ROPO. Qualified Card Valid until March 2019

Fungicide analyses example: Nectarine SICA Agri H13007 on 30/05/17 (FLUDIOXINIL 0,37 LMR 5)

Packaging traceability:

- Cardboard Boxes: 40x30x9. Supplier Ondupak. Delivery note ...0313.

Supplier evaluation: Ondupack. BRC IOP valid until 2019, Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place, Technical Sheet 24.04.2017.

- Cavity Trays: Supplier Nespac BRC IOP valid until 15.03.2019. Delivery note I/181805.

Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place, Technical Sheet 16.01.2017.

Customer specification. QAS Specification: Nectarine Cavity Tray (2016), BRIX> 9, Hardness 2-5 kg, temperature 2-8°C ...

The records reviewed for the traceability challenge during the site inspection include Intake QC, Packed Product QC,

- Intake quality Control (PERI program): e.g. F18/2121, kgs sampled 40 kgs. A little damage by stone. 86 % good fruit. BRIX 8,6, hardness 8,7

- Labell Control: Confirmation of the label. Size, origin. Product Cod, Class I, GGN.

- QC Report 04.07.2018. Id 2051. BRIX (>10), Hardness, weight control (In this case Seize control: 10 fruits), Labell control. There are attached pictures (Packaging and deliveries), Delivery temperature (By Testo Thermometer, 4,2-4,6°C)

- Shelf life: From 04.07.2018, until 07.07.2018 (Ambient), until 13.07.2018 cold store. Weight change, dehydration, hardness, mould development

- Deliveries: Delivery note M18/991, CMR 1795198, transport by customer (43PS40) Temperature 3.°C.

- Glass audit, HACCP REG 2. Daily. e.g. 04.07.2018, punctual incidents (Fire hydrant, fractured but not broken).

- knife & scissor log, Inspection records are kept on format REG 17, example 04/07/18, including giving and retreat

- Cold Store control (Jhonson Control system). e.g. 04.07.18 (Temperature 1,5-2°C)

- Monthly maintenance inspection, example: Facilities on SGC R-1, weekly on w-30 by Joaquin Gallardo (maintenance), including all the facilities elements

Traceability test took less than 4 hours including forwards and backwards and including packaging material as well

3.10 Complaint handling

The system for capture, recording and management of customer complaints is detailed in procedure SGC PRO 3

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Aug 10. Complaints should be investigated and records made of investigation and action taken. Complaints and corrective actions are documented.

The company has received customer complaints equivalent to 2% of the total quantity produced during the current season.

Last complaint analysis took place on Aug 2017.

Season 18 (Currently): Europe 1,93%,

No safety complaints.

Quality Complaints: Trips. Dehydrated, soft fruits...

E.g. PO4076, on 29.06.2018. Peaches, Bad Flavour...

3.11 Management of incidents, product withdrawal and product recall

There is a plan in place for management of incidents, recall and product withdrawal. These are detailed in the procedure: PR 07 Sep. 2013. All potential emergency situations that could impact food safety have been considered and the procedure indicated types of incidents which indicates any issues relating to quality, legality and safety, such as MRL issues, quality problems, hygiene, and production contamination. The company has also developed a crisis team and a list of key contacts available, maintained and updated and is tested as part of the incident management test procedure.

The recall procedure is scheduled to be tested annually; the last test was carried out on 23/07/18, 4 pallets POS 27554 nectarine regarding a MRL problem, including times, responsibilities', etc. Requirement to notify the Certification Body in 3 days in event of recall is detailed in the procedure. There have been no recalls since the previous audit.

3.12 Customer focus and communication

Customers' expectations are covered on the management review 15/03/2018.

The company has implemented systems to ensure that customer-specific policies and requirements are understood, implemented and clearly communicated to relevant staff via production meetings and documented procedures cascaded to production and quality management staff.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.4	no processes outsourced
3.5.4.1	no processes outsourced
3.5.4.2	no processes outsourced
3.5.4.3	no processes outsourced
3.5.4.4	no processes outsourced

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4 Site Standards

4.1 External standards

The site is situated in a rural area with open fields around the premises and is of suitable size, location and construction to permit maintenance and to allow the production of safe and legal products. The buildings are in good repair and maintained.. There are no local activities that pose a risk of product contamination. The building fabric was noted to be in a good condition and the facility was well proofed, this been subject to regular internal inspections.

Consideration has been given to local activities (example: pesticides treatments on the annex premises).

The building was constructed on 2003 and this year has been extended with a new packaging material packhouse and a extension of some areas.

Condition of the site is checked as part of the internal inspections schedule

4.2 Security

The site is a registered food business with number 21.19933/BA for Security and a Security Risk Assessment which includes documents/exterior/access/interior/transport/raw materials/staff for packing of horticultural and fruit crops.

All visitors and contractors report and sign a log recording their arrival, read and sign agreement to comply with site personal hygiene rules and other GMPs on arrival at the office.

Staff are also trained in security procedures during their induction training and this is regularly review. (See 7.1)

The site is enclosed with locked external door. SGC FVL4 15/05/17 for Security and a Security Risk Assessment which includes documents/exterior/access/interior/transport/raw materials/staff. Pending evaluation 2018 (New measures: security guards).

The following control measures are in place: visitor, driver and contractor reporting system, secure fences and CCTV.

4.3 Layout, product flow and segregation

The site has a linear process flow, with adequate space between equipment for cleaning, inspection, maintenance and pest control purposes.

The outline process is : raw material intake, inspection (defects, hardness, Brix^o, dimensions, etc.), pre-chilling, short term storage, grading, washing with water, fungicide post-harvest application (when applicable to peaches, nectarines, plums, and flat peach), packing (packed per weight or units), palletising, labelling, pre-chilling, cold storage and despatch (chilled). No processes are subcontracted.

Separate areas are in place between raw material intake, production and materials storage.

There is a site diagram indicating the staff travel routes and location of staff facilities; this also includes routes of disposal of the various types of waste; the plan was dated Jul 17: staff routes, product route, and waste. Low risk category.

See NC 4.3.4

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

The factory is constructed from modern building materials. The process and packing equipment is of a satisfactory standard.

Floors are constructed of sealed concrete, which are maintained through the maintenance programme and are in a generally good state of repair. Walls and ceilings were refurbished with fridge board.

There were no windows in the production area.

External doors are suitably proofed to prevent pest ingress. Door discipline was observed to be satisfactory during the assessment. All doors seen during the visit were found to be in a good condition and were easy to clean. Satisfactory protected fluorescent light tubes and flood lighting provide good lighting levels. During the site inspection it was noted that the factory storage and process areas were satisfactorily ventilated and there were no signs of condensation or excessive dust.

See NC 4.4.3

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4.5 Utilities - water, ice, air and other gasses

All water used on site is from the mains, supplied by the local authority (AQUAGEST Municipality). Water is used for cleaning, fruit washing and fungicide application. Fiver analysis are carried out yearly. Water is analysed for compliance with RD140/2003 annually for certain parameters by an accredited La: Muniera (ENAC 268/LE 551) #180324130, last analysis on 16/03/18. The analyses comprise microbiological (clostridium, E. Coli and total coliforms, and TVC at 22°) with no findings. Chlorine controls are carried out every day for asparagus season by Rosa Godoy
See NC 4.5.2

4.6 Equipment

The principle equipment is:
The 36 lines (where the fresh product is unloaded from the intake boxes) 10 washing machines, loading belts, where the packed product crates are transferred to the pallet forming area, 20 cold stores, 4 post fungicides application equipment.
In addition there are palletisers, forklifts, palletisers and measuring equipment such as scales and thermometers. Equipment contact surfaces are all stainless steel. Replacement conveyor belts are supplied with confirmation of approval for food use. Engineers are aware of the requirement to ensure that all equipment which is in direct food contact is suitable and complies with legal requirements.
e.g. Last one, Certificacion Neubauer

4.7 Maintenance

GMAO IT maintainace program; Responsible Joaquin Gallardo, including processes to minimise the risk of product contamination during maintenance.
Maintenance clearance procedures are detailed to ensure that on completion of any maintenance work machinery is inspected to verify that it is clean, that there are no tools, machine parts or other potential foreign bodies: daily checks,
e.g Preventive activity: 24.07.2018. Grading equipment review.
Corrective activity: Pallets dumper equipment repair on 20.07.2018.

During the site inspection equipment, fixtures and fittings were observed to be appropriately maintained. No observations were made where there was a risk of product contamination. The maintenance procedure includes processes to minimise the risk of product contamination during maintenance. Maintenance clearance procedures are detailed to ensure that on completion of any maintenance work machinery is inspected to verify that it is clean, that there are no tools, machine parts or other potential foreign bodies.
The engineering workshop and storage areas are tidy and well maintained. The engineering workshop is remote from production areas. Lubricants and other engineering materials used on site are food grade, and allergen free, with specifications being held. Example: Aceite Lubricante Wurth NSF: #126583, The allergen status was known (allergen free)

4.8 Staff facilities

All areas are considered as low risk: male and female changing facilities within the main building are maintained in clean condition by dedicated cleaning staff. Individual lockers are provided. Working clothing is stored separately inside the lockers.
All water taps are provided with hand-free operation. Sufficient toilet facilities are provided with hand washing Equipment with advisory signs to prompt hand-washing is provided.
There are canteen facilities. Canteen is provided and this is controlled by the local authorities. This area is regularly cleaned and monitored daily by QA staff.
Smoking is only permitted in the designated area outside the factory building. Bins are provided.
There are hand-washing facilities at the entrance of all production areas and these are supplied with hot water, liquid soap and disposable towels. There is provision for hand washing and sanitising as required within production areas. Pictorial instructions how hands should be washed were displayed. Adequate toilet facilities are provided. Toilets do not open directly into production, packing or storage areas. Toilet hand wash facilities are supplied with hot water, liquid soap and disposable towels.

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

The purchase of chemical supplies is controlled by the Approved Supplier Procedure.
Safety data sheets are available and specifications confirm suitability for use in food industries.

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Cleaning chemicals are securely stored in a locked store room and chemical used for water treatments in another area where mixing and applications are made.
All containers are suitably labelled and are dispensed via dosing systems designed to ensure concentrations are correct.

4.9.1 Chemical control

Cleaning chemicals as well as rodent control chemicals were suitable for the activity, example: Use food:
example: Disinfectant: OXIPREMIUN #13-20/40-06810-HA

4.9.2 Metal control

A documented knife policy was in place – knives and scissors are numbered and inspected daily in and out of the factory by the QA Assistant; inspection records are kept on format REG 17, example 04/07/18, including giving and retreat. No snap-off blades are permitted.
Ingredients control includes the prevention of ingredients sealed in packaging with staples, paper clips etc. Metal detectors are not used.

4.9.3 Glass, brittle, plastic, ceramics and similar materials

SGC INS 12 Jul 15 explaining the operative: requires that production stops, product is isolated, the area is cleaned using dedicated single use utensils, the area is inspected, authorisation is required before production can commence, work wear is changed, footwear inspected and records completed.
A glass register is in place and there are daily glass audits recorded on REG 2; No glass incidents have occurred to date. Records of the last glass / hard plastic audit on 04/07/17 were reviewed. punctual incidents (Fire hydrant, fractured but not broken).)

4.9.4 Products packed into glass or other brittle containers

No Glass Packaging

4.9.5 Wood

Wooden pallets are used is for final product packing.
See NC 4.9.5.1

4.10.1 Foreign-body detection and removal equipment

HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)

4.10.2 Filters and sieves

HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)

4.10.3 Metal detectors and X-ray equipment

HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)

4.10.4 Magnets

HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)

4.10.5 Optical sorting equipment

HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)

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

There are no products packed in glass jars.

4.11 Housekeeping and hygiene

Housekeeping and cleaning systems are in place which ensure appropriate standards of hygiene are maintained at all times and that risk of contamination is minimised. The site operates a clean as you go policy during production hours with a full clean at the end of production. Documented cleaning procedures PRE PRO 1 Sep 14 which includes areas, responsibilities, products, etc, example: Product line : cleaning, rinse and disinfection, daily

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doses (2%, disinfectant (OXIPREMIUN #13-20/40-06810-HA).

Daily visual verification controls are carried out: example Damasa Naranjo PRE-REG 01 on 04/07/18
In Addition microbiological test are carried out, example 01.07.2017. LABAN #20189949 on 04/07/18 including Mesophile Aerobes (no findings) and enterobacter.

Cleaning activities are carried out by training staff, example: Example: Damasa Naranjo Elena Godoy trained by FEPEX on 27/02/04.

See NC 4.11.1

4.11.7 Cleaning in place (CIP)

No CIP on site

4.12 Waste / waste disposal

Waste licensed companies are contracted for waste disposal and withdrawal such as:
Antolin Gomez accreditation B-06-233-598/Ex RTAV-154 for general waste, plastic, carton, etc.,

Retiradas Organicos accreditation GASAN E-10389292/ex/av-186 last retreat 23/07/18
Adequate Waste collections containers are in place.

4.13 Management of surplus food and products for animal feed

Surplus is adequaytely handled; example B Food Banks last retreat 23/07/18 authorization R-1165-24/07/17-2.

4.14 Pest Control

Preventative pest control on site is managed by a contracted third party who includes all areas of the site and specifies preventative measures. External company; PROYNTEC , authorization ROESBI: 06/044/0058/S/L 12 visits on the season.

Plan dated Jul 17 identifying all bait.

Records from the last visit were verified during the visit, 24/07/18.

There are chemical and non-chemicals baits and EFK's E.F.K.'s are controlled internally, last control on 02/05/18. Consumptions in 2 baits (Near to intake product door) and 4 external baits.

Inspection records and trend analysis were available.

Rodent trend analyses was carried on From January 2018 until march 2018, no problems were identified. Pest control devices are identified by labels on each unit and on the wall above the location. Health and Safety information is available for all materials used on site.

The pest control information includes details of the contract, site visits, products used and recommendations, which are followed by the company (example doors closing).

Safety data sheets were examined: internally stick trampa monitora, externally NUPILAC ELITE PRO (ES /RM-2011-18-00003).

Staff have been trained on pest control including the need to report any evidence of pest activity to the Quality Manager on August 15 (See training)

There are some devices for fly insects control (Drosophyla). Internal Controls. Product "Suzuky Trap"

On an annual basis, there is a combined review of the activity and facilities over the year by the company Quality Manager and the Pest control company. The last inspection was carried out on 07/02/18. Only consumptions in February "External Baits", May "Only External baits" Water treatments area. No infestations, no internal consumptions.

No EFKs infestations

4.15 Storage facilities

HACCP including the ranges of working 0,5-18 °C depending on the product and the process, and this is checked continuously day via IT programs; example 04/07/18 Cold store 01- T 1,5-2°C.

Cold stores are linked to alarm system depending on the product/temperature range.

Storage areas are dry and well ventilated. Stock control is achieved on a FIFO basis, with each pallet of raw materials carrying the serial number code, and all products being dispatched on the day of production. All auxilliary materials are identified on arrival with a lot code to enable traceability and stock control.

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4.16 Dispatch and transport

PRE INS 15 Aug 2010 including the operative of loading and control: Temperature range 2°-10°C depending on the product and the process. Vehicles are inspected prior to loading, and this is recorded on the system (checked in the traceability test and in the assessment).

Raw material and packaging transport is arranged by suppliers.

Dispatch process is verified every dispatch: example Delivery note M18/991, CMR 1795198, transport by customer (43PS40) Temperature 3.°C.

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5	No high risk/care areas.
4.3.6	No high risk/care areas.
4.3.7	No high risk/care areas.
4.4.4	No HR/HC
4.4.13	No HR/HC
4.9.4.1	No products are packed into glass or similar containers.
4.9.4.2	No products are packed into glass or similar containers.
4.9.4.3	No products are packed into glass or similar containers.
4.10.1.2	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.1.3	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.1.4	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.2.1	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.2.2	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.3.3	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.3.4	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.3.5	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.4.1	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.5.1	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh)
4.10.6.1	No glass containers are used
4.10.6.2	No glass containers are used
4.11.7.1	Not applicable there are no CIP operations on site
4.11.7.2	Not applicable there are no CIP operations on site
4.11.7.3	Not applicable there are no CIP operations on site

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5 Product control

5.1 Product design/development

The procedure for new product development is described within the SGC PRO 15 Oct 12
 Since the last audit, asparagus has been included on the company process. A new HACCP for asparagus has been documented and validated, according to NPD.
 Shelf life determination is not required for fresh products as per the EU Directive 2000/13; however, the company is following the client specification and documented procedures, SGC PR 10. Sep 2013 to carry out such controls:
 Example: Shelf life: From 04.07.2018, until 07.07.2018 (Ambient), until 13.07.2018 cold store. Weight changes, dehydration, hardness, mould development

5.2 Product labelling

Product labelling comply with the appropriate legal requirements and contain information to enable the safe handling, display, storage and preparation of the product within the food supply chain or by the customer.
 The technical contents of labels are checked to confirm compliance with specifications and legal requirements for the designated country of use according EB 2017.
 Label verification: e.g Confirmation of the label. Size, origin. Product Cod, Class I, GGN. QC Report 04.07.2018. Id 2051. BRIX (>10), Hardness, weight control (In this case Seize control: 10 fruits), Labell control. There are attached pictures (Packaging and deliveries), Delivery temperature (By Testo Thermometer, 4,2-4,6°C)

5.3 Management of allergens

There are no allergens handled on site. The company has an Allergen SGC Pol 2 Jul. 15. The policy is included in the hygiene rules and is communicated at induction – staff may not bring allergen products on site.
 All allergen incidents should be included in management, HACCP and food safety reviews. No issues were reported in the most recent management review.
 Staff have been trained in allergens (See training)

5.4 Product authenticity, claims and chain of custody

Systems are in place to minimise the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions and claims are legal, accurate and verified ; through the RASFF and AECOSAN website.
 A risk assessment has been carried out SGC EVAL 6 Aug 17 including all regarding requirements.
 Mass balances are carried out periodically when products are labelled, e.g. 04.07.2018. Mass balance quantities were accurate for the total of delivered income and outcome, Intake product 693000 kg , Delivered 594000 kgs Wastes: 99000 kgs. 14,3% (on the average of the company).
 All the produce packed through the packhouse from the company farm is assured GLOBALG.A.P: Customers have been informed that this is the case, and if necessary, GGN is used. (example 4050373891367).

5.5 Product packaging

Finished products are packed in paper , cupboard, film and plastic boxes. Packaging material: Film :Industrias Graficas Vidal batch L-3320 07/06/16 Rubber band : Montblan batch AL 17-000341 28/02/17 Cupboard Box: ONDUPACK batch 07 14/02/17 Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place
 - Cardboard Boxes: 40x30x9. Supplier Ondupak. Delivery note ...0313.
 Supplier evaluation: Ondupack. BRC IOP valid until 2019, Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place
 - Cavity Trays: Supplier Nespac BRC IOP valid until 15.03.2019. Delivery note l/181805.
 Declaration of conformity regarding the Reg. 1935/2004 and/or Reg. 10/2011 are in place

5.6.1 Product inspection and testing

Analysis Plan: According to Integrated Production normative.
 1 analysis / Farmer and kgs "1 variety >50 tm", All farmers GLOBALGAP Certified.
 Total for 2018=150 analysis (80 until today).
 Analyses are carried out, Pesticides: e.g. Plum SICA Agri KL27583 on 20/07/18. Pesticides, Nectarine: AGRAMA #00024....001 on 22.06.2018, Fenbuconazol, Fluopiram, Spinosad. Accordind 396/2005.

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Asparagus: SICA Agri K9872 on 07/03/18.
 Heavy Metals. (7 in the last season, minimum 4 / season), E.g. Asparagus, Laban Heavy metals #03.07.2018, Pb and Cd.
 See NC 5.6.1.1

5.6.2 Laboratory testing

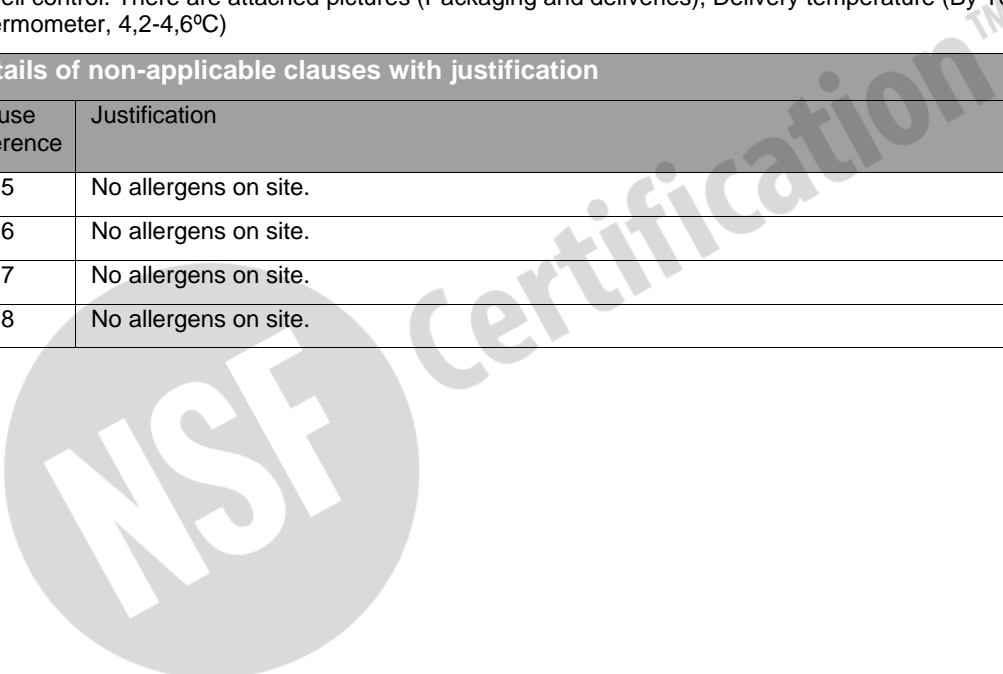
Document INS APPCC 18 was reviewed which explains the analyses procedure
 See NC 5.6.2.3

5.7 Product release

The company operates a positive product release system, DCC R02 25/04/10 which includes a review of production records and final produce weight, quality and label inspection. All out of specification products are clearly identified, labelled and quarantined to prevent accidental release. Controls are carried out every batch:- QC Report 04.07.2018. Id 2051. BRIX (>10), Hardness, weight control (In this case Seize control: 10 fruits), Labell control. There are attached pictures (Packaging and deliveries), Delivery temperature (By Testo Thermometer, 4,2-4,6°C)

Details of non-applicable clauses with justification

Clause reference	Justification
5.3.5	No allergens on site.
5.3.6	No allergens on site.
5.3.7	No allergens on site.
5.3.8	No allergens on site.



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6 Process control

6.1 Control of operations

Production specifications are available for all products which include any equipment settings. The company has procedures that verify that the processes and equipment are capable of producing consistently safe and legal products with the desired quality characteristics. A procedure for checking is in place to ensure that product is packed into the correct packaging and lines are cleaned.

Process monitoring checks ensure that the product is produced within the required specification. Monitoring includes foreign body detection, storage temperatures, weight checks, label checks, fruit quality parameters and production label checks. Copies of labels that are used are retained with production records.

Nectarine, Peaches, Flat Peaches packed in cavity trays, meshes, terrines, cardboard / plastic boxes has been seen on the audit 30/08/17.

6.2 Labelling and pack control

A procedure for checking is in place to ensure that product is correctly labelled. Every lot and despatch is checked. This checking was verified during the traceability exercise. The label information is the responsibility of customers

6.3 Quantity, weight, volume and number control

The company operates a positive product release system,SGC PR 10 Sep 2013 which includes a review of production records and final produce weight, quality and label inspection. All out of specification products are clearly identified, labelled and quarantined to prevent accidental release. Controls are carried out every hour. (including at least one box per control)

Example: QC Report 04.07.2018. Id 2051. BRIX (>10), Hardness, weight control (In this case Seize control: 10 fruits), Label control. There are attached pictures (Packaging and deliveries), Delivery temperature (By Testo Thermometer, 4,2-4,6°C)

6.4 Calibration and control of measuring and monitoring devices

Measuring equipment is calibrated to traceable national standards according AL 80: including the operative in case of deviation failure Weighing equipment (industrial pallet scale) are calibrated externally every year (equipment SMART 753407 calibrated by labex # CA-17/0526/BA on 28/04/17.

Daily checks are made using certified test pieces to verify accuracy standard (METTER TOLEDO #11118064 Oct 15) example scale QC, on 04/07/18.

Thermometers are verified weekly using certified thermometers to verify accuracy standard (TESTO #2631149) example w 30.

Refractometers are verified internally weekly example w 30.
Pressure equipment is verified internally weekly example #2 w 30.

Fungicides equipment are calibrated externally, example TECNIDEX 18/07/17.

Details of non-applicable clauses with justification

Clause reference	Justification

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7 Personnel

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

The company has a comprehensive training programme for staff on induction, specific on the job training and refresher training PF 2017 that includes HACCP, Hygiene, Food Defense, Quality, Labeling and GAP's. The company ensures that all employees are adequately trained, instructed and supervised and staff was able to demonstrate competency to conduct the activities witnessed during this audit.

Procedures are in place for training and monitoring staff engaged in CP's activities. The effectiveness of the training is monitored by external visual assessment and on the job observation Training records were reviewed JAntonio Cabanilla (load/unload responsible), Luis Nieto (Cols Stores responsible) and Almudena Ciudad and Arancha Vega (QC), Isabel Cano, Rosalia Sanchez (production), Carmen Calderon (labeling). They were found to be competent in explaining his role and completing associated records

Food Hygiene, Food Defense, Allergens, example: R.D.C. 03.04.2018, M.G.A. 07.05.2018,

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

PRE CR 1, including all the regarding requirements
 No evidence of non-compliance observed during the factory inspection, daily checks are carried out, example PRE REG 01 on 04/07/18 by Damasa Naranjo
 Blue plaster are used and monitored on RAT including issue and return

7.3 Medical screening

Documented medical screening procedures C.S.V. are in place for all employees and visitors; evidence of records for staff and visitors were verified. The company requests that all visitors state they are not known, or suspected, to be suffering from, or to be a carrier of a disease or illness likely to be transmitted through food. All employees are notified of the requirements to report sickness during their induction training.

Visitors complete a questionnaire which is checked by an appropriate manager before being permitted to enter production or storage areas

7.4 Protective clothing: employees or visitors to production areas

Staff members are given overall, coats, shirts and cups two sets are given to each one; these are allowed to be washed at home for which washing guidelines were in place; these are not allowed to be used externally or inside toilets.

Rules to clean the uniforms have been given: PRE CR 1
 The effectiveness of the laundry by staff is verified by daily checks, PRE REG 01
 See NC 7.4.1

Details of non-applicable clauses with justification

Clause reference	Justification
7.1.2	No CCPs identified
7.2.4	No metal detector
7.4.4	Low risk only

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