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Audit Report

Global Standard Packaging Materials Issue 6: August 2019

1.Audit summary			
Company name	SHAONENG GROUP LUZHOU ECO (XINFENG) TECHNOLOGY CO., LTD.	BRCGS site code	10004561
Site name	SHAONENG GROUP LUZHOU ECO (XINFENG) TECHNOLOGY CO., LTD.		
Scope of audit	Manufacture (Pulp preparing, moulding, packing) of disposable pulp moulding tableware (paper plates, paper bowls, paper cups, paper lids, paper boxes, paper trays) for direct food contact.		
Scope exclusions	None		
Justification for exclusion	None		
Start date	2024-03-25	Finish date	2024-03-26
Re-audit due date	2025-04-01	Previous audit date	2023-03-20

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
Choose an item	Choose an item		
Choose an item	Choose an item		

2.Audit results			
Audit result	Certificated	Audit Programme	Announced
Audit grade	A	Previous audit grade	A+
Certificate issue date	Select a date	Certificate expiry date	Select a date

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

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

3.Company details

Address	No.18 Xinma Avenue, Industrial Park, Matou Town, Xinfeng County, Shaoguan City, Guangdong Province, P.R. China. Post Code: 511100		
Country	China	Telephone	+8613360692069
Commercial representative Name	Mr. Zhou Pu	Email	snlzxf_ddzx_pmc@163.com
Technical representative Name	Ms. He Shizhen	Email	hgb@gdlz.com

4.Company profile

Plant size (square metres)	10-25K sq.m	No. of employees	51-500	No. HARA Plans	1-3
Subcontracted activities	No				
Outsourced processes	No				
Other certificates held	ISO 9001, ISO 14001, ISO 45001, ISO 50001				
Regions exported to	North America South America Asia Europe Choose an item.				
Major changes or auditor observations since last BRCGS audit	Since last BRCGS audit, GM was changed. Quality and safety management manual was modified by management. Policy and objectives were modified by GM. HARA team leader and member were changed.				
Company description	The company has been founded on Aug. 15, 2017. It is a joint-stock company and the legal representative was Mr. Ling Zhixiong. The plant size was 24968 square meters. The company employs 463 employees on two shifts, 10 hours per shift and 5-6 days per week. There were two buildings for production with the same production line. One building is being equipped with production line, but without production. The				

4.Company profile	
	production line in other building was equipped with 3 set of pulp preparing machines, 192 thermoforming machines, 192 mechanical hands, 15 punching machines, 8 UV lighting sterilizing machines, 16 heat shrink packing machines. The company produce disposable pulp molding tableware (paper plates, paper bowls, paper cups, paper lids, paper boxes, paper trays) for direct food contact. All products are direct food contact. In 2023 production capacity is about 28000 tons and total turnover is 460 million RMB. There is no any outsources and subcontractors. There is no seasonal production and no traded product. 95% products were export. The main client was in North America, Japan, Korea, EU, Oceania and China Mainland. The kind of customer is trader. The company had been awarded the certificate of ISO 9001, ISO 14001, ISO 45001 and ISO 50001. No misuse BRCGS logo and references to certification status.

5.Product and process characteristics	
Manufacturing Categories	02 - Papermaking Please select Please select Please select Please select Please select
Products in production at the time of the audit	Paper plates (10”, PO no. LZ-DO-2023001), paper boxes (203*203*63mm, PO no. DG2023003).

6.Audit duration details			
Total audit duration	16 hours	Duration of production facility inspection	7 hours
Reasons for deviation	None		
Next audit type selected	Announced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2024-03-25	08:30	18:00
2	2024-03-26	08:00	15:30

Auditor information		
Auditor number	Auditor Name	Role
21529	Robin Guo	Lead Auditor
Click or tap here to enter text.		Please select

Present at audit				
Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mr. Ling Zhixiong / GM	x		x	x
Mr. Qiu Yuefeng / Management representative	x	x	x	x
Ms. He Shizhen / Compliance Manager	x	x	x	x
Mr. Zhou Ruli / HR & Admin Manager	x	x	x	x
Mr. Luo Minyu / R&D Manager	x		x	x
Mr. Zhang Gui / Purchase Manager	x		x	x
Mr. Huang Nianchu / Production Manager	x	x	x	x
Mr. Xu Huangxin / Production Supervisor	x	x	x	x
Ms. Chen Wenjuan / Dispatch Center Supervisor	x		x	x
Ms. Su Wen / Production Supervisor	x	x	x	x
Ms. Lai Yinzhu / Logistics Center Supervisor	x	x	x	x
Me. Zhu Zhe / Finance Manager	x			x
Mr. Yan Zhilin / Maintenance Manager	x	x	x	x
Ms. Chen Caimei / System Specialist	x	x	x	x
Ms. Peng Siqin / System Specialist	x	x	x	x

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced
2022-04-01	BRCGS Packaging Materials Issue 6	Announced
2023-03-20	BRCGS Packaging Materials Issue 6	Unannounced
2024-03-25	BRCGS Packaging Materials Issue 6	Announced

Document control				
CB Report number	7484196261			
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Standard Issue	6	*Template issue date*	2022-02-15	
Directory allocation	PackMat	*Version*	1.0	

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Non-Conformity Summary Sheet

Major non-conformity against statement of intent of a fundamental requirement				
No.	Clause	Detail	Critical or Major	Re-audit date

Critical			
No.	Clause	Detail	Re-audit date

Major							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	1.1.1	The evidence of policy communicated to all staffs was unavailable. During the audit, auditor interviewed three staffs, two staffs cannot answer correctly about policy.	We trained all staff on the company's quality and safety policy.	1. Conduct regular training and assessment of food safety policy for employees. 2. Post quality, safety policy on the bulletin board for employees to read at any time.	1. The two staffs forgot quality and safety policy. 2. The staffs were not trained on food safety policy periodically.	2024-04-11	Robin Guo
2	3.10.1	During the audit, evaluation record for pest control service contractor (Guangzhou Ju'an Pest Control Co. Ltd.) was unavailable.	We organized the evaluation of the pest control service contractor.	We develop supplier evaluation schedule, train evaluators, and conduct evaluation for all service suppliers regularly every year.	1. We did not evaluate the pest control service supplier in time. 2. We did not make the evaluation schedule for service suppliers.	2024-04-11	Robin Guo
3	4.7.6	During on-site audit in the inner packing workshop, temporary repairs using tape was observed on a working table.	We removed the tape.	1. Inspect the machines, equipment and facilities regularly, and make thorough repairs immediately if temporary repairs are found. 2. Conduct training for relevant employees. And strengthen the inspection of production equipment.	1. The staff did not fully clean the working table when cleaning. 2. Inspection of working table before production is not good.	2024-04-11	Robin Guo
4	4.9.2.4	During on-site audit in the pulp preparing workshop, auditor found the staple	We stopped to use the stable to stable the production record immediately.	1. The production record were pasted with solid glue. 2. Conduct training for employees to identify the	The staffs did not familiar with the management system of foreign objects (small objects). No	2024-04-11	Robin Guo

		was used to staple the production record.		requirements of physical contamination.	awareness of foreign objects control, and do not have adequate training.		
5	4.11.4	During on-site audit in the workshop, an electric fly-killing device (no. BZCJ1-ZF-D067) was not worked normally.	We replaced new lamp tube of electric fly-killing device (no. BZCJ1-ZF-D067).	1. Strengthen the inspection of electric fly-killing devices. And reflect in time when problems arise. 2. Conduct training for relevant staffs.	1. The lamp tube of electric fly-killing was out of work. 2. The monitoring of the pest device has not been implemented effectively. Nobody found it once they were not workable.	2024-04-11	Robin Guo
6	5.8.3	During on-site audit, CoA of a batch of raw material (waterproof agent Ak-15, lot no. 231117, receiving date: 2023-11-22) was unavailable.	We asked the supplier to supplement the CoA of this batch of waterproof agent.	1. All raw material suppliers have been required to provide CoA for each batch, which is archived by the R&D center's laboratory personnel. 2. The inspector need check CoA for each raw material when inspection for incoming goods.	1. The CoA provided by the supplier was not saved in time, and the CoA provided by this batch was lost. 2. The inspector did no check CoA for all raw materials in time.	2024-04-11	Robin Guo
7	6.4.2	Auditor was not required to fill in a health questionnaire prior to being allowed into production workshop.	We made the health questionnaire. And to fill out the records for all the visitors.	1. Conduct training for relevant staffs. 2. Set up a department to fill the questionnaire for visitors.	We have the related procedure. But we did not compile the health questionnaire.	2024-04-11	Robin Guo
8	6.5.4	During the on-site audit in the inner packing workshop, external pockets on the upper body garments and sewn buttons were found on the	We replaced the protective clothing which no external pockets on the upper body garments and sewn buttons.	1. Check the protective clothing for employees daily and replace the protective clothing that does not meet the standard requirements immediately.	The management personnel of purchase department are not familiar with the standards, resulting in work not meeting the requirements.	2024-04-11	Robin Guo

		protective clothing for employees.		2. Inform the purchase department the requirements for work clothes. Work clothes purchased in the future must not have sewn buttons.			

Comments on non-conformities
During this audit, 8 minor non-conformities were raised. Corrective action evidences of all non-conformities were completed within 28 calendar days. Effectiveness of Corrective Action was accepted.

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Additional Modules/Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Detailed Section

1.	Senior management commitment
1.1	Senior management commitment and continual improvement

Since last BRCGS audit, GM was changed. Manual was modified by management. Policy was modified by GM.
The company had established safety and quality control system of product. The company had a clearly defined and written product safety and quality policy in place in the Quality and safety management manual (LZXF-BRCGS/02, version A/2, issued date 2023-11-02). Documented quality policy and objective was established and approved by GM Mr. Ling Zhixiong. Management review and internal audit were carried out every year to search for continual improvement.
Policy was defined as:
Providing customers with safe, legal, and high-quality disposable biodegradable disposable pulp moulding tableware is the most basic social responsibility we should undertake.
The policy is communicated to staffs.

Product safety and quality culture is defined by the GM. The defined activities (such as training, team building, regular meeting) involving all sections of the site that have an impact on product safety and quality. The action plan indicating how the activities will be undertaken and measured and the intended timescales. The review evidence of the effectiveness of completed and ongoing activities was available.

Since last BRCGS audit, the objects were modified by GM.
The management has established clear objectives related with product quality, safety, and legality. These are measurable and documented. These objectives in 2024 are such as:
1. Product quality delivery qualification rate≥97%.
2. Product qualification rate ≥98%.
3. Customer satisfaction rate≥90%.
4. On-time delivery rate is 100%.
5. Safety accident rate≤2 times per year.
The objectives are communicated to relevant staffs. And the general objective was break down to eight departments. The monitoring and evaluation frequency of Customer satisfaction rate is once a year. The monitoring and evaluation frequency of other objectives is each quarter. Sampled the latest objective monitoring record was available and achieved.

Senior management provide adequate human and financial resources. QA department is responsible for collect relevant scientific and technical developments industry codes of practice and relevant legislation. Such as GB 4806.1-2016, GB 4806.8-2016, GB/T 36787-2018, FDA 21CFR 176.170, FDA 21CFR 175.300, EC No. 1935/2004, 2011-65-EC, EU-10-2011, 1907/2006/EC and so on. Control of this information was according to Document control procedure. Genuine, electronic version of BRCGS packaging material issue 6 was in place. The BRCGS re-audit due date was from Mar. 4, 2024 to Apr. 1, 2024. The recertification audit was carried out on Mar. 25-26, 2024.
GM, Management representative, manager and supervisor of other department are presented in opening and closing meetings. They are available when requested during audit. The non-conformities raised in last audit were all closed effectively. Non-conforming control procedure was followed to close out all the nonconformities based on root causes. No misuse BRCGS logo and references to certification status.
Minor 01 (1.1.1)- The evidence of policy communicated to all staffs was unavailable. During the audit, auditor interviewed three staffs, two staffs cannot answer correctly about policy.

1.2	Management review

Management review control procedure (LZXF/PD-005) was available. Management review was carried out once a year. The latest management review was conducted on Feb. 5, 2024. GM Mr. Ling Zhixiong moderated management review. All department's manager and supervisor attended.
Product quality delivery qualification rate, Product qualification rate, Customer satisfaction rate, On-time delivery rate, Safety accident rate are set KPI. All KPIs were achieved and reported by relevant department's manager and supervisor. Management review records showed that review input and output were considered properly. There was one decision that were given by GM. The objective was modified after review meeting.
Product safety, legality, integrity and quality meeting was carried out each month, the meeting records in Feb. 19, 2024 was supplied.

1.3	Organisational structure, responsibilities, and management authority

Organizational chart and responsibilities defined, including those with an impact on product safety, legality and quality. It covered all business processes. Auditor checked the organization chart which was signed on updated 2023-11-02 by GM.
Total 8 departments were established such as HR & Admin department, Dispatching Centre, Production department, QA department, R&D department, Sales department, purchase department and Warehouse department. Responsibilities are documented in job description of each key job title. The delegation when absent was also appointed for each key job title.
Duty instruction of every station (GM, management representative, manager, supervisor), key staffs and responsible person was in place. Work instruction such as housekeeping schedule, specification of materials, QC quality inspection instruction was in place.

Non-applicable clauses	None

2.	**Hazard and risk management**
2.1	Hazard and risk management team

Since last BRCGS audit, HARA team leader and member were changed.
Total 15 persons in HACCP team who came from different department, such as HR & Admin department, Dispatching Centre, Production department, QA department, R&D department, Sales department, purchase department and Warehouse department are responsible for managing hazard and risk management system. The team leader is Management representative Mr. Qiu Yuefeng with more than 20 work years' experience and training on BRCGS standard. Vice team leader is Ms. He Shizhen with more than 15 work years' experience and training on BRCGS standard. Training on BRCGS was provided to all members and on interview found competent.

2.2	Hazard analysis and risk assessment

Formal hazard and risk management system was established by the company. Total one HARA plan (LZXF/HACCP-2020, version A/1, issued date 2023-02-10) in place that ensured that hazards to product safety and integrity were identified and appropriate controls established.
The scope is clearly defined from raw material reception to finished product distribution. The HARA team has taken account of the national regulations, legislative requirements, and technical practice code.
Full description of the products is developed, which includes all relevant information on food safety.

Composition- Bleached bamboo pulp board, bleached sugarcane pulp board, oleophobic agent, waterproof agent, defoamer.
Origin of raw materials- Bleached bamboo pulp board, bleached sugarcane pulp board, oleophobic agent, waterproof agent, defoamer, PE plastic bag, carton. Recycled materials include offcuts and non-conformity products.
Target shelf life- 3 years.
Prescribed storage- dry and cool place.
Intended use- direct contact with food.
Packaging: PE plastic bag, carton.

The main processes of products as below:
Raw material inspection- pulp preparing- thermoforming- trimming- selecting- UV disinfecting- inspecting- packing- storing- delivering

The HARA team had carried out verification of flow diagram of product on site, and the latest verification of flow diagram was conducted on Jan. 4, 2024. The verify record was available for review. All possible hazards & risk have been considered for Biological (due to cross contamination and infestation), Chemical (heavy metals, component transfer) & Physical (foreign particles) hazards. Hazards have been identified and analysed based on historical data, relevant code of practices, and Customer requirements. Hazard Analysis covers raw and packaging material.

Refer Procedure for Hazard Analysis and HARA plan and all the hazards are given the points for likelihood of occurrence & the consequences.
After hazard and risk analysis by the HARA team. There is no CCP and two OPRPs were set. The company had established the monitoring system and the OPRPs were under control, and the action criterions for OPRPs were conforming on site. The monitoring system was able to detect the deviation of OPRPs. Records associated with monitoring OPRPs were complete and reviewed by production manager every working day. Documented correction action plan for OPRP in the HARA plan. And the treating methods case of deviation was specified. Deviation of OPRPs was not occurred during this audit. There is no CCP, clause 2.2.8, 2.2.9, 2.2.10 and 2.2.11 are NA.
Hazard and risk management system reviewed by HARA team was undertaken on Jan. 4, 2024 on the annual basis including all aspects. And product test by third-party lab and official sampling against product safety legislation.

Non-applicable clauses	2.2.8, 2.2.9, 2.2.10, 2.2.11 After hazard and risk analysis by the HARA team. There is no CCP.

3.	Product safety and quality management
3.1	Product safety and quality management system

Since last BRCGS audit, Quality and safety management manual was revised by management.
The company had established and implemented Quality and safety management manual (LZXF-BRCGS/02, version A/2, issued date 2023-11-02) which described the company's commitment to quality and outlined work methods. Procedure and WI was clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. The site is not part of a company governed by a head office. The annual review was undertaken to improve during management review.

3.2	Document control

Document control procedure (LZXF/PD-001) was established and implemented in the factory. The documents, records and data critical to the management of product safety, legality and quality were sampled for review which were all effectively controlled. Most documents are hard copies to control. Few electric version documents like customer specifications, regulation was stored securely and backup to prevent loss or malicious intervention.

3.3	Record keeping

The company had established Record control procedure (LZXF/PD-002), records such as test reports for heavy metal test, quality control records were found maintained to demonstrate the effective control of product safety, legality and quality. Alterations are controlled and access of records is restricted to QA department. Defined in record control procedure, highlights the requirement of controlling of the quality records. The shelf life of products is 3 years. The records were kept four years.

3.4	Specifications

Detailed documented specifications are available. The specifications are compliant with relevant product safety and legislative requirements. Product specification as well as declaration of conformity is part of each order and it is defined upon customer´s requirements (e.g. paper plates, 10", specification no. LZXF/WD-001-YF01-01, Feb. 15, 2023, paper boxes (203*203*63mm, specification no. LZXF/WD-001-YF01-01, Feb. 15, 2023).
The declaration of compliance is in place with date 2024-02-22 which had ensured that the materials manufactured complied with the relevant legislations. The statement of compliance is compiled and authorised by sales manager. The statement of compliance is reviewed by HARA team each year. Manufacturer's trademark on packaging is formally agreed. Sampled formally agreed letter between the site and client was available. Specification review is conducted where the product composition or characteristics change. Any changes to existing agreements or contracts are agreed, documented and communicated to Sales department.

3.5	Internal audits

The company had established Internal audit control procedure (LZXF/PD-015). The scheduled programme of internal audits is once a year. The scope and frequency of the internal audits is established in relation to the risks associated with the activity and previous audit performance. The latest internal audit was conducted on in Jan. 22-23, 2024. The scope of the internal audit programme includes HARA, PRP, product defence and product fraud prevention plans, and procedures implemented to achieve the Standard.
The audit team has 6 internal auditors. The member number was enough manpower to conduct audit cross-over departments with personnel who are independent from their responsibilities. The internal auditors were trained BRCGS Packaging Materials Issue 6. Such as Such as Mr. Qiu Yuefeng (Certi. No. GZSY-2021-N0210100250176, training agency: Shenzhen Siyu Management Consulting Co., Ltd.). Ms. He Shizhen (Certi. No. GZSY-2021-N0210100250177, training agency: Shenzhen Siyu Management Consulting Co., Ltd.).
The checklists were used for audit to check the compliance level of all BRCGS clauses, for both conformities as well as non-conformities. There was three minor NCs were raised. Internal audits finding report were signed by the auditee. Corrective actions are defined as well as deadline for implementation based on root cause analysis. Non-conformities were notified to appropriate personnel and discussed with the management. The corrective action is initiated within a specified time frame. The completions of the corrective actions were verified by the Audit team. At audit time, auditor found that the NC of internal audit

had been closed accordingly.
The hygiene inspections to assess cleaning and housekeeping performance and fabrication inspections was carried out every week by Admin department staff. Relevant records were available for review.

3.6	Corrective and preventive action

The company had established Corrective and preventive action control procedure (LZXF/PD-012) to ensure investigation of the root cause of non-conformity would be performed and corrective actions would be taken. The company could show the corrective and preventive actions records, the effectiveness of root cause analyses was evaluated.

3.7	Supplier approval and performance monitoring

All suppliers were evaluated, selected, monitored according to Supplier approval and monitoring procedure (LZXF/PD-035) as follows: Enlist candidate -> Get information -> Performance analysis -> Evaluate score by five criteria -> Select vendor who pass acceptance score -> Approve Supplier List -> Buy commodity from selected supplier -> Monitoring purchasing performance -> Supplier assessment -> Re-evaluation -> Re-selection.
The score was set according to several items, including late delivery, food safety, PRP, HARA study, solving problem, traceability, and so on. Approval procedure of supplier defined in Purchasing control procedure to ensure that all suppliers of raw materials, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The questionnaire was used for all suppliers, including agents and brokers. The score above 85 was defined as A level suppliers. The score ranged from 70 to 85 was defined as B level suppliers. The score ranged from 60 to 69 (C level suppliers) was for reservation, and score under 60 was D level suppliers for rejection. Total 12 suppliers were approved. The assessment is done annually.
Approval procedure of supplier defined in Supplier approval and monitoring procedure (LZXF/PD-035) to ensure that all suppliers of raw materials, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The risk-based justification is provided. Supplier questionnaire used for initial approval of suppliers.
Total 12 suppliers in the company. Up-to-date paper list of approved suppliers is available. The list was readily available to the relevant staff.
Auditor sample checked:
Bleached bamboo pulp board, bleached sugarcane pulp board supplier (Guangxi Liantuo Trade Co., Ltd. & Jiangxi Mutian Trade Co., Ltd.) was assessed on 2024-02-20. Oleophobic agent, waterproof agent supplier (Shanghai Zhanhe Industrial Co., Ltd.) was assessed on 2024-02-21. PE bag supplier (Dongguan Zhengli Packaging Co. Ltd.) was assessed on 2024-02-20. They all were found acceptable.
The suppliers of raw materials have an effective traceability system, such as the lot number and production date were used for all the raw materials., the plant collected the traceability evidence from the suppliers. Last manufacturer's license and test report of raw materials, which purchased from agent had been collected and verification by the company. According to Purchase control procedure (LZXF/PD-034), the purchase activities are performed mainly with suppliers who have been approved. All purchases are performed through approved suppliers. There was no exception purchasing when supplier has not been assessed before.

3.8	Product authenticity, claims and chain of custody

Fraud vulnerability assessment management procedure (LZXF/PD-017) is established by the company. Risk assessment about products authenticity and custody had been undertaken by the company. Information collected from government source and internet. Documented vulnerability assessment records for all raw materials were available. All suppliers were identified as low risk supplier by the company. Lasted

vulnerability assessment record was review on Jan. 11, 2024. All raw materials identified as low risk, clause 3.8.3 is NA.

3.9	Management of subcontracted activities and outsourced processes

NA. No subcontracted activities and outsourced processes.

3.10	Management of suppliers of services

External service control procedure (LZXF/PD-019) is established. At the present of operational activities, the factory has put under control these service as follows: Pest control, Waste disposal, Product third-party laboratory analysis, Measurement device calibration, Transportation. The assessment is done annually. The selected suppliers were approved by plant manager. Total five services suppliers.
Auditor sample checked:
Service contract of pest control with Guangzhou Ju'an Pest Control Co. Ltd. Contract valid until 2025-03-14. Service contract of hazard waste disposal with Guangdong Tiansheng Environmental Protection Technology Co., Ltd. Contract valid until 2025-03-01. Service contract of transport with Shenzhen Huxinbang Logistics Co., Ltd. Contract valid until 2025-02-28. Service supplier performance monitoring was conduct on Mar. 13, 2024, assessment record was available.

Minor 02 (3.10.1)- During the audit, evaluation record for pest control service contractor (Guangzhou Ju'an Pest Control Co. Ltd.) was unavailable.

3.11	Traceability

Labelling and traceability procedure (LZXF/PD-019) is established. The traceability system is able to trace the products on whatever forward or backward direction covering all the stages. There are no raw materials are in bulk silos.
Raw materials' lot number was recorded in processing stage, and each processing stage follow the unique job order number, the final product was identified by PO number for effective traceability. PO number of finished product is printed on the label. The coding is not applied.
The company had established Labelling and traceability procedure (LZXF/PD-019), the traceability system was mock test annually by the company.
The latest test from finished product to raw material was conduct on Jun. 2, 2023 about Paper plates (8.86", PO no.: 007508, quantity 72000 pcs, production date: Dec. 28, 2022), the mock testing records can be proved that all traceability test can be achievable.

The latest test from raw material to finished product was conduct on Sep. 4, 2023 about bleached sugarcane pulp board (lot no.: B823072501), the mock testing records can be proved that all traceability test could be achievable.

During the audit, auditor randomly checked paper boxes (6", PO number: YQG-LZ-2023DD011, production date: Dec. 2-4, 2023) to traceability test, according to production records, inspection records, PO number and supplier was traced less than 4 hours. Sample: Raw materials: bleached sulphate bamboo pulp board, lot number: B223112502. Bleached sugarcane pulp board, lot number: B723112101. The traceability system is effective.
Production date of rework material (non-conformity products) were recorded for traceability control.
Traceability of test data and samples to production lots are maintained.

3.12	Complaint handling

Customer complaint management procedure (LZXF/PD-022) is established. After complaint resolving, the root cause analysis is conducted for further corrective actions. Since last BRCGS audit to now, there have 3 complaints, none related to product safety. Auditor sampled reviewed case of complaint which received from Japan on 2023-07-18 about some black spots were found on the paper boxes (PO number: S-601). The root cause analysis, corrective, and corrective action were implemented. The root cause analysis, corrective, and corrective action were implemented.
The complaint data analysis was implemented by QA department, and latest analysis report was available.

3.13	Management of product withdrawals, and incidents and product recalls

Product recall control procedure (LZXF/PD-013) was established. The withdrawal team is established comprising of five members from Dispatching Centre, Production department, QA department, R&D department, Sales department. Management representative Mr. Qiu Yuefeng is responsible for initiating the withdrawal. For communication phone emails are used. The procedure also defined for the methodology for carrying out root cause analysis. The withdrawal team list indicates the name, department, position, mobile phone. This is assured the capability of being operated at any time to notification to the customer, stock return, logistics for recovery, storage of recovered product and disposal.
Emergency control procedure (LZXF/PD-004) defines what emergency situation of incident such as malicious contamination, fire, IT disruptions to distribution, failure of critical equipment, energy disruption etc. The instruction was communicated and trained freshly on Sep. 20-21, 2023 to contingency team and other relevant staffs. A contingency plan has been described in this instruction. The plan addresses actions to be initially reported and necessary action to resolve the case and to prevent releasing affected products.
Product recall control procedure (LZXF/PD-013) is in place for all items required. An updated key contact list was in place. Since last BRCGS audit to now, no actual withdrawal and recall. In case of being involved in a product recall, factory will take part positively to assist with supply information about product as required. So far, there is no such case. Mock withdrawal was tested one a year. Last product mock withdrawal was carried out on 2023-06-02 for product Paper plates (PO no.: 007508, quantity 75000 pcs, delivered in 2023-03-02) with 100 % recovery.

Non-applicable clauses	3.8.3 All raw materials identified as low risk. 3.9 No subcontracted activities and outsourced processes.

4.	Site Standards
4.1	External standards

The company had considered that the local activities and site environment was not potential bad impact on product and production, the possible contamination was prevented well, no dust and odor on site. The external areas were in good order and well maintained. The building fabric shall be maintained to minimise potential for product contamination. There is no external silos and pipework for the product and raw materials. Drains are external and suitable and adequately protected. No external storage of raw materials, clause 4.1.5 is NA.

4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas

Workshop: the materials used for floors is terrazzo. The materials used for walls and ceiling is cement or Choi steel.
Warehouse: the materials used for floors, walls, ceilings are cement.

The walls, floors, ceilings at the site were found to be maintained to a high standard. Windows were found to be protected with film from damage. The company had inspected the suspended ceilings regularly. Internal drain openings are suitably protected against the entry of pests and designed to minimise odour. Windows are designed and protected with film against breakage. Non-production glass including, all bulbs including those on flying-insect control devices, are adequately protected. The lighting is sufficient and suitable for safe working environment. The ventilation was adequate in the produce area by air-condition. No elevated walkways in the site, clause 4.2.6 is NA.

4.3	Utilities

City water is used to pulp preparing and equipment cleaning. City water supplied should be tested by authoritative laboratory once a year. The latest test comply with GB 5749-2022 was conduct on Nov. 21-25, 2023 by Shenzhen Academy of Metrology & Quality Inspection. The number of test report is WT10103230202823WT1, qualified.
Steam, ice and other gasses are not used in production. Compressed air used to control valve of machine, not directly in contact with products.

4.4	Site security and product defence

After threat assessment include both internal and external threats by HARA team, documented Product defense plan was in place. The company had established the security arrangement programme to define the control of security to prevent access of unauthorised persons to production and storage areas. The terrorism treatment was defined in crisis treatment procedure, and responsible by Administration dept. security team. Process and storage areas were identified restricted areas. The relevant inspection records were available. Product defence plan was reviewed once a year. The latest Product defence plan was reviewed on Dec. 21, 2023. All the key access (staff entrance, raw materials entrance, pack and storage areas) were with monitor camera system and special monitor staff, contractors and visitors were asked to register by security guard at factory entrance, and were required to answer health questionnaire before enter. Visitor reporting system is in place. There were no external storage tanks, silos and any intake pipes with an external opening, clause 4.4.3 is NA.

4.5	Layout, product flow and segregation

Layout and product flow are adequate. The whole process follow from intake to despatch is logically and enough working space available for all operations. Sorting or other activities involving the direct handling of product takes place in areas that have the same standards as production areas. Designated and segregated area for removal of outer packaging is available. Designated walkways are providing adequately segregating for materials and for personnel movement in production area and plant yard. Facilities are well positioned to provide simple and logical movement routes for personnel.

4.6	Equipment

The production line was equipped with 3 set of pulp preparing machines, 192 thermoforming machines, 192 mechanical hands, 15 punching machines, 8 UV lighting sterilizing machines, 16 heat shrink packing machines.
On site, all equipment were appropriate materials, had suitable design to ensure effectively clean. New equipment purchasing was concerned the suitability. Equipment position had kept adequate space from the wall and adjacent areas as so that clear space was available to facilitate cleaning and servicing. New equipment purchasing was concerned the suitability. Equipment position had kept adequate space from the wall and adjacent areas as so that clear space was available to facilitate cleaning and servicing. For any

changes in equipment/addition of new equipment, machinery hazard analysis and risk management plan is documented. Wooden desks are properly sealed to enable effective cleaning. Notices on cutting machine are cleanable and secure.	
4.7	Maintenance
The preventive maintenance programme is formulated covering all items of the equipment and plant within the specified intervals of week and month. Maintenance logs is maintained for all off-line testing equipment. The maintenance was performed as per schedule by sampling records for all equipment were available. Clearance requirements after maintenance are defined in the SOP and indicated in maintenance record. Tools and other maintenance equipment are taken through a tool trolley and after maintenance is verified by tool operator. No incident of temporary repairs seen at the time of visit to the facility. Maintenance workshops is a segregated room. Contractors involved in maintenance or repair are suitably monitored by maintenance supervisor and is responsible for their activities. Minor 03 (4.7.6)- During on-site audit in the inner packing workshop, temporary repairs using tape was observed on a working table.	
4.8	Housekeeping and cleaning
Housekeeping and cleaning systems were in place which ensured that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised. A good standard of housekeeping is maintained including the policy “clean as you go”. The company had established C&D plan to ensure appropriate standards of hygiene are maintained at all times and the risk of contamination is minimized. And the rule included responsibility for cleaning, area/equipment/ utensils, frequency, method of cleaning and disinfecting, cleaner and disinfector, check method and corrective actions in case of deviation. Chemicals (75% Alcohol) are used for cleaning. The toilet used chemical and tools only store in locker inside toilet to separate with used in other areas. During on site audit, the hygiene of the plant was acceptable. After risk assessment, Microbiological environmental monitoring programme (LZXF/WD-005-YF01-02) is in place, and include sampling protocol, identification of sample locations, frequency of tests, target organisms (e.g. TPC, coliform) and test methods. Relevant microbiological environmental monitoring records were available.	
4.9	Product contamination control
4.9.1	Glass, brittle plastics, ceramics, and similar materials control
There is no unnecessary non-production glass, ceramics or brittle plastic observed. Glass, brittle material management regulation (LZXF/WD-039-SC01-02) is established. List of glass and brittle material is maintained for location, number, periodical checking frequency and responsibility. Glass, brittle material checked by equipment team staff every week. Relevant check records on Dec. 2023-Feb. 2024 were reviewed. In case of breakage, QC staff is responsible for the cleaning operation and takes assessment.	
4.9.2	Sharps and metal control
The sharp control policy is stated in the Sharp management regulation (LZXF/WD-039-HG01-01). Sharp blades, equipment and tools are controlled well and placed in designated location. Snap-off blade knives are not used. Open noticeboard is used in storage area.	

Minor 04 (4.9.2.4)- During on-site audit in the pulp preparing workshop, auditor found the staple was used to staple the production record.	
4.9.3	Chemical and biological control
Chemicals management regulation is established to prevent contamination from any chemical or biological hazard. Chemicals used for cleaning, disinfection, lab chemical reagent are all suitably controlled and approved list was prepared. The biological hazard analysis was taken in HARA system and the disinfection to equipment, environment was undertaken to minimize the contamination risk, no allergen used in site.	
4.10	Waste and waste disposal
The company had established Waste management regulation. Guangdong Tiansheng Environmental Protection Technology Co., Ltd is appointed to waste disposal of the company. Contract valid until 2025-03-01. Process waste (dust and offcuts) is managed to minimise release to the environment. Waste bins are provided and labelled for different category. Waste is removed from waste area as per truck load and record of waste is maintained. Process waste is categorized based on the intended means of disposal, segregated and collected in appropriate designated waste containers. The material wastes and substandard materials are handled by company, and destroyed the trademark before transfer and record keeping. The refuse was stored in one room of external area under pest control and clean regularly to minimize the risk of pest harbourage. Substandard trademarked is destructed internally, clause 4.10.6 is NA.	
4.11	Pest management
Pest control procedure (LZXF/PD-030) is available. Pest control contractor is Guangzhou Ju'an Pest Control Co. Ltd. and certificated PCO No. was 20220119002053. The latest contract was signed on Mar. 15, 2024-Mar. 14, 2025. In contract, the normal service frequency was once or twice a month, pest control plan was clear defined it. The certificate of contracted pest controller was available (such as pest controller Ye Xingxin, certificate number: 31351057, training agency: Guangdong Jianwei Occupational Skill Testing Authority). All the pest control devices installed and used according to pest control plan. Pest control equipment such as bait stations traps or electric fly-killing devices were appropriately located. The building was suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points. Bird scarers were installed above loading and unloading areas to prevent birds from nesting. No pest trace was found during on site audit. The contract clearly defined when the infestation was found, the corrective action would be taken immediately by contracted pest control company, since last audit, no pest (rodent) infestation found. Records of pest inspections in Feb. 22, 2024 were supplied. Pest control was managed by external agency. Detailed record of recommendations of pest management was available, the trends analysis was done each quarter, the latest trends analysis report and survey in depth was done on 2024-03-18, and suggestive improvement was supplied, corrective actions were taken. Understanding of employees on pest control was proper. Pest control training on 2023-05-15, and the training was effective. Minor 05 (4.11.4)- During on-site audit in the workshop, an electric fly-killing device (no. BZCJ1-ZF-D067) was not worked normally.	
Non-applicable clauses	4.1.5 No external storage of raw materials. 4.2.6 No elevated walkways in the site. 4.4.3 There were no external storage tanks, silos and any intake pipes with an external opening.

	4.10.6 Substandard trademarked is destructed internally.

5.	Product and process control
5.1	Product development
Product development control procedure (LZXF/PD-023) is in place to ensure the production of safe products to defined quality parameters. Company undertakes production of specific products on behalf of identified customers. Specifications of each order are developed considering all design processes and records at each step of agreement and execution are maintained. Technical drawings, product specifications and samples were all agreed prior to production and signed. Samples are maintained for each consignment with the Production department. Design and project changing management procedure in place to address the transfer of customer specifications or requirements to the site's own systems.	
5.2	Graphic design and artwork control
Artwork management defined in Product development control procedure (LZXF/PD-023) was established to control artwork. Technical department staff in charge of artwork making and conversion management. Relevant record was available. Formal acceptance by customer/ specifier was required and the approved sample, artwork masters were retained with clear identification for traceability. Graphic design and artwork control procedure is established to control changes to manage obsolete artwork. Normally the artwork files were kept in electric form by technical staff with authority which were back-up in one hard disc. No printing processes at all, clause 5.2.3 and 5.2.4 are NA.	
5.3	Packaging print control
NA. No printing processes at all.	
5.4	Process control
Production process control procedure (LZXF/PD-026) is established to ensure the quality assurance of process operations. The review of the manufacturing process is undertaken, and with consideration of HACCP system to identify the manufacturing process control points as raw materials receiving, pulp preparing, thermoforming, trimming, UV disinfecting, inspecting and packing. Manufacturing process control point of raw materials receiving, pulp preparing, thermoforming, trimming, UV disinfecting, inspecting and packing are set in process specification. Relevant process specifications were available. Thermoforming machine is setting to safety of product. The equipment setting is completed by trained and authorised staff. Bill of materials was specified in product job order. Each line is released by QC after first article inspection is taken. The process control plan defined the activities at start-up, after equipment adjustment and frequent check during production. Documented line clearance regulation (LZXF/WD-010-SC01-01) is established to clear off the remains of previous production. The HARA plan, processing instruction, process specifications, machine settings are reviewed, re-established, if necessary, based on validation of trial product data after any change of artwork, product composition, processing methods or equipment. Documented line clearance regulation is established. The line clearance is implemented for each production run.	
5.5	Calibration and control of measuring and monitoring devices

Monitoring and measuring equipment control procedure (LZXF/PD-014) is available. All Measuring equipment used to monitor product safety and legality shall be identified. The identified measuring equipment was calibrated to a recognized national standard. The monitoring and measure equipment list was in place. The measuring equipment was calibrated by local official calibration agency regularly. Relevant calibration records and official certificates were available. Once the prescribed measuring and monitoring devices are found not to be operating within specified limits. The actions included products identification, segregation and treatment, measuring and monitoring devices re-adjusted to ensure accuracy unauthorized adjustment of measuring and monitoring devices was prohibited.

5.6	Product inspection, testing and measuring

One lab exists for normal physical tests including dimension, appearance. The product inspection for each batch before release according to Production inspection regulation. The product inspection instruction was based on national standard. Quality checks are undertaken at start up and each process step has inspection as per process inspection instruction. Based on risk analysis there is no need for in-line product testing equipment to ensure product safety is in place. The laboratory test method defined clearly the operation of all equipment used in product inspection, testing and measurement. That instruction is also described the plan to, routine check or function test for that equipment. The plan includes equipment name, check frequency, check sensitivity, check responsibility, check report form. The in-house lab was conducted routine testing. And the laboratory management rule was established and implemented. Test methods and analytical methods are most recent version and be available in the laboratory or where off- line testing is conducted. Samples are stored properly to avoid degradation. The test methods used by the site in both on-line and off-line testing are validated. Standardised tests are used, the site ensure prescribed methodologies are followed. Product inspection and testing control procedure defined to investigate out-of-specification results whether the cause is non- conforming product or a testing failure. Shenzhen Academy of Metrology & Quality Inspection is subcontract laboratory. Subcontracts lab was accordance with the requirements and principles of ISO 17025. No in-line equipment, clause 5.6.3 is NA. No in-line testing equipment, clause 5.6.6 is NA. No automated inspection equipment in the site, clause 5.6.9 is NA.

5.7	Control of non-conforming product

The non-conforming products control procedure (LZXF/PD-012) is established by the company. QA department is responsible for the decision taken and supervision of implementation of corrective action. The quarantine area is separately designated in warehouse. There is no solution to rework or put to alternative use.

5.8	Incoming goods

Raw materials incoming inspection SOP is established to ensure incoming goods match purchase specification. Raw materials incoming testing standard defined the requirement of inspection of loads on arrival. The defects of raw materials are identified by the company. The results of the investigation are recorded. The results of in-house testing or verification of data are held until released for use. All the goods in warehouse are labelled with identification card to show the name, purchase order, receipt date. Raw materials receipt and issue follow principle of FIFO. The company has a system in place to validate all raw materials and intermediate products prior to their introduction to the process.

Minor 06 (5.8.3)- During on-site audit, CoA of a batch of raw material (waterproof agent, lot no. 231117, receiving date: 2023-11-22) was unavailable.

5.9	Storage of all materials and intermediate and finished products

Warehouse management regulation is established and implemented. The raw materials and finished products are stored in designated warehouses, and chemical warehouse is in one house outside of production building. There are no special requirements regarding humidity or temperature of warehouse. Storage premises are constructed enough to protect the product from contamination and malicious intervention. No off-site storage in the site. Finished and intermediate product storage meet FIFO. There is no external storage of finished product. Packaging used for storage or dispatch of finished products is appropriately protected. The warehouse management regulation is formulated to segregate raw materials, intermediate products and finished products. Hazardous chemicals were stored in warehouse in external area of workshop. Material intended for recycling was packed with plastic bag against contamination hazards.	
5.10	Dispatch and transport
Product protection and transport control procedure is established and implemented. The warehouse and transportation control follow the procedure to manage the process of storage and transportation well. Plastic and wooden pallets are used in good conditions. They are checked daily at each dispatching and monthly by warehouse keeper. The company has one own transport vehicle and cleaned as per schedule. Third party transportation companies are outsourced and contamination prevention requirement defined in contract. Delivery vehicles is checked before loading for cleanliness, odour, debris, unwanted materials etc. The factory has third-party contractors for finished product transportation. Contracts are made with container liners with conditions that are in comply with BRCGS standard requirement for dispatch and transport. The conditions are agreed and maintained. Drivers of transportation company can only stay inside vehicle and negate need to entry of workshop and warehouse.	
Non-applicable clauses	5.2.3, 5.2.4, 5.3 No printing processes at all. 5.6.3 No in-line equipment. 5.6.6 No in-line testing equipment. 5.6.9 No automated inspection equipment in the site.

6.	**Personnel**
6.1	Training and competence: raw materials handling, preparation, processing, packing and storage areas
All personnel are trained before commencing their work. Personnel are supervised throughout the working period in which training. New employees receive induction training covering all areas of management system. Induction training program includes company profile, company regulation, hygiene rules. Temporary or contracted employees receive brief coaches on their work scopes including hygiene and product safety requirements. The training plan is in place to cover all the employees including contract employees. The induction training is also given to all the employees. Such as: Product inspection, testing, measuring, laboratory testing, calibration training on 2023-05-24. BRCGS training on 2023-12-11. Operatives at manufacturing process control points training on 2023-11-23. Product defence training on 2023-10-20. The method is made by regular meeting, notice board for communicated to relevant personnel when changed procedures, working methods and practices related to product safety or quality. The competency is reviewed through skill matrix. The same is done on based on this training are provided. Training records are kept at QA department and at HR & Admin department. All training forms are conducted by experience staffs of factory or external professional tutors. Relevant training record was available. HR management procedure (LZXF/PD-006) is in place where training need is identified through skill matrix and training	

calendar is prepared and based on the same training is given. After training the effectiveness is measure by taking written test, observation and feedback.

6.2	Personal hygiene: raw materials handling, preparation, processing, packing and storage areas

Document Personal sanitation management regulation defined clearly the good hygiene practices that involving in: Jewellery policy, Handwashing requirements, Watch, mobile phone and personal belonging policy, Personal medicine policy, Fingernail's requirements. The instruction is communicated for adoption to all personnel via training ad adopted by the company. Personal hygiene was adopted for all staffs, contractors and visitors. The compliance with this instruction is checked daily. Auditor reviewed hygiene check record on Dec. 2023.-Feb. 2024 and found accepted. All employees and visitors are requested to wash hands prior to enter production areas following illustrated instructions. Any kind of watch, mobile phone and personal belonging is not allowed all personnel to take when presenting in workshop. Document Personal hygiene regulation define clearly personal medicine policy. Personal medicines are not allowed taking in to production areas. Personal hygiene regulation defined where visitors cannot comply with site hygiene rules, they shall non-handling of product or use gloves. The blue plasters are used in case of minor open cuts or scratches. The person who is in use of plaster will be arranged to perform temperately other duties out of production lines where they cannot contact directly with products.

6.3	Staff facilities

The lockers and changing rooms are arranged at the entrance of production areas. All production employees have their own locked cell. The cell is large enough to keep personal items. Protective clothing was hung in locker room and private one stored in locker. Eating, drinking and smoking are not allowed in locker rooms and workshop. No drinking facility provide within production area. One drinking area was designed outside of production area. The stations are sited at the entrance to the production areas. They are provided with suitable and sufficient hand-washing devices, including warm water, liquid soap, air driers, 75% alcohol sanitizer and advisory signs to instruct correct procedures.
All employees, contractors and visitors are requested to wash their hands whenever they enter to production areas no matter how it is the first entry or coming back from outside for any reason (such as break, toilet, canteen etc.). The toilets are segregated and do not open directly into production areas. Hand-washing facilities were provided by the company. Visitors and contractors have a separation room to clean the cloths. They are noticed about and requested to follow procedures as same as permanent workers for the cleaning, protective clothing and other hygiene rules. Eating in production and storage areas is forbidden. Canteens are provided to serve the need of eating. They are segregated from processing area of product in scope of auditing. They were in good food safety conditions. The water drinking stations with spill-proof lidded containers are provided at the designated confine places in production area where are far from equipment. Designated controlled smoking areas was provided and isolated from production areas.

6.4	Medical screening

The company had established personnel hygiene rules, employees would be medically examined prior to employment and yearly during employment. During on-site audit, auditor random sampled eight operators' health certificates, all operators' health certificates were available. All visitors and contractors are requested to fill in the health questionnaire prior to being allowed into production, packing or storage areas. After risk assessment, medical screening for sites producing materials that will not come into direct contact with food is implemented.

Minor 07 (6.4.2)- Auditor was not required to fill in a health questionnaire prior to being allowed into production workshop.

6.5	Protective clothing
After hazard and risk assessment, company has provided protective clothing and hairnet to all the personnel in handling raw materials, and in preparation, production. Company has provided protective clothing to all the personnel in production area. Company issued two sets protective clothing for staffs that are suitable and required to wear in production area. Footwears are suitable and required to wear in production area. The gloves are white. The gloves are changed every working day. All protective clothing is laundered by home laundry. Protective clothing cleaning regulation (LZXF/WD-021-CJ01-01) is established by the company. All protective clothing is laundered by home laundry. All employees received written instructions regarding the laundering process. Laundering process training was done each year. Washed protective clothing are stored in plastic bag. Employees take washed protective clothing from home to the workplace. The clean and dirty clothing is segregated suitably. No disposable protective clothing is used in the site, clause 6.5.10 is NA. Minor 08 (6.5.4)- During the on-site audit in the inner packing workshop, external pockets on the upper body garments and sewn buttons were found on the protective clothing for employees.	
Non-applicable clauses	6.5.10 No disposable protective clothing is used in the site.

Requirements for traded products	
7.1	Approval and performance monitoring of manufacturers/packers of traded packaging products
NA. No traded products in audit site.	
7.2	Specifications
NA. No traded products in audit site.	
7.3	Product inspection and laboratory testing
NA. No traded products in audit site.	
7.4	Product legality
NA. No traded products in audit site.	
7.5	Traceability
NA. No traded products in audit site.	
Non-applicable clauses	7.1, 7.2, 7.3, 7.4, 7.5 No traded products in audit site.

Additional Module: Plastic Pellet Loss Prevention	
10.1.1	Senior management commitment and control improvement

Click or tap here to enter text.	
10.2.2	Hazard analysis and risk assessment
Click or tap here to enter text.	
10.3.5	Internal audits
Click or tap here to enter text.	
10.3.6	Corrective and preventive action
Click or tap here to enter text.	
10.3.13	Management of incidents
Click or tap here to enter text.	
10.4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas
Click or tap here to enter text.	
10.4.4	Site security
Click or tap here to enter text.	
10.4.5	Layout
Click or tap here to enter text.	
10.4.8	Housekeeping and cleaning
Click or tap here to enter text.	
10.4.10	Waste and waste disposal
Click or tap here to enter text.	
10.5.8	Incoming goods
Click or tap here to enter text.	
10.6.1	Personnel: training and competence
Click or tap here to enter text.	
Non-applicable clauses	Click or tap here to enter text.