Audit Report

Global Standard Packaging Materials Issue 6: August 2019

1.Audit summary			
Company name	Anhui Ancheng Bamboo and Wood Tableware Co., Ltd.	BRCGS site code	10012382
Site name	Anhui Ancheng Bamboo and Wood Tableware Co., Ltd.		
Scope of audit	Manufacturing of disposable bamboo and wooden tableware (knife, fork, spoon, boat, pizza stander, chopsticks, skewer, flag skewer, beef skewer, sandwich skewer, coffee stirrer, ice cream bar, fruit fork, umbrella skewer, stick, finger skewer, toothpick skewer, ice cream spoon, bread tong, straw, plate, box, tray) through pre-treatment, moulding, hot stamping or not, UV sterilization, sorting and packing for food contact use		
Scope exclusions	None		
Justification for exclusion	Not applicable		
Start date	2023-12-26	Finish date	2023-12-27
Re-audit due date	2024-12-26	Previous audit date	Select a date

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	B	Previous audit grade	Please select
Certificate issue date	2024-01-18	Certificate expiry date	2025-02-06

Number of non-conformities		
	Major against SOI of Fundamental	0
	Critical	0
	Major	1
	Minor	8

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3.Company details

Address	No. 006, Xingqiao Street, Qianrenqiao Town, Shucheng County, Lu'an City, Anhui Province, 231320		
Country	P. R. China	Telephone	+8619955221014
Commercial representative Name	Tang Jinfeng	Email	2512479864@qq.com
Technical representative Name	Tang Jinfeng	Email	2512479864@qq.com

4.Company profile

Plant size (square metres)	<10K sq.m	No. of employees	51-500	No. HARA Plans	1-3
Subcontracted activities	No				
Outsourced processes	No				
Other certificates held	FSC				
Regions exported to	North America Europe Asia Choose an item. Choose an item.				
Major changes or auditor observations since last BRCGS audit	The initial certification				
Company description	The company was established in 2022 and located at No. 006, Xingqiao Street, Qianrenqiao Town, Shucheng County, Lu'an City, Anhui Province. The areas of production and storage are approx. 9406 s.q.m and runs 1 shift/8 hours daily (6 days /week). There is 1 incoming material warehouse, 4 processing workshops and 1 finished product warehouse. Product: food contact disposable bamboo and wooden tableware. Management system: the company has passed the certification of FSC.				

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4.Company profile	
	The capacity is about 12000 tons every year. The products are provided to Asia, EU and USA.

5.Product and process characteristics	
Manufacturing Categories	06 - Other manufacturing 07 - Print processes Please select Please select Please select Please select
Products in production at the time of the audit	Wooden and bamboo fork, knife

6.Audit duration details			
Total audit duration	12 hours	Duration of production facility inspection	6 hours
Reasons for deviation	None		
Next audit type selected	Announced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2023-12-26	09:00	18:30
2	2023-12-27	08:00	11:00

Auditor information		
Auditor number	Auditor Name	Role
20333	Rupert Rao	Lead Auditor
N/A		Please select

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Present at audit Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Tang Jinfeng/QA Manager	Onsite	Onsite	Onsite	Onsite
Han Zhicai/Warehouse Manager	Onsite	Onsite	Onsite	Onsite
Zhang Huan/Admin Manager	Onsite	Onsite	Onsite	Onsite
Hong Zujun/MT Manager	Onsite	Onsite	Onsite	Onsite

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced

Document control				
CB Report number	NKG290289			
Template Name	P609 Packaging Materials Audit Report Template v11			
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
1	2.2.12	The review of the hazard and risk management system and prerequisite programmes wasn't carried out.	The review was performed.	To list it in schedule of team, to review the result in management meeting and make it in KPI of team. To train team members in time.	The review wasn't list in schedule of team. The team members didn't remember to review it.	2023-12-31	Rupert Rao

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Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	3.11.2	Onsite observed one pallet wooden knife in storage area of packing workshop wasn't labelled with identified batch no.	The materials were labelled.	To update the identification control procedure with identification card. To train operator for updated control procedure. To check the identification before start-up of processing and review the checking records.	The label was not stick timely. Operator didn't understand the traceability requirement.	2023-12-31	Rupert Rao
2	4.2.4	Onsite observed one glass window near temporary storage area of molding room wasn't shielded to prevent breakage.	The window in the workshop was shielded with films to prevent breakage.	To review it with KPI and management meeting. To update checking frequency of glass windows and chief check the result.	It was missed by MT due to maintenance of window.	2023-12-31	Rupert Rao
3	4.2.7	Onsite observed the two lights of molding area weren't worked normally.	The lights were maintained well and worked normally.	To check its conditions and train operators/MT. QA check the result after maintenance.	New lights weren't purchased in time.	2023-12-31	Rupert Rao
4	4.11.4	Onsite observed the EFK no 9 at entrance of packing area wasn't worked normally.	The EFK was maintained well.	To train PCO. To review the checking records.	The light of EFK was installed turned on.	2023-12-31	Rupert Rao

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Minor							
5	5.4.7	Onsite observed the clearance activities of stamping M/C no.1 wasn't performed after previous processing.	Clearance was performed.	To check the clearance condition regularly and review the clearance record monthly by chief. To update the checking flow and train operators.	Operator didn't have enough aware, operator didn't understand the clearance requirement completely.	2023-12-31	Rupert Rao
6	5.9.2	Onsite observed two bag knives before packing were not protected with cover or film at storage of workshop.	The bags were sealed well to protect products.	To train operator, QC will check protection condition regularly and let it review in monthly management meeting.	The packing operator wasn't trained for protection.	2023-12-31	Rupert Rao
7	6.2.3	Onsite observed the personal telephone was found in workshop.	Training was performed.	To check it and review the checking result by chief monthly.	The operator didn't have enough aware. He took it into workshop without permission.	2023-12-31	Rupert Rao
8	6.3.6	Onsite observed hand dryer at hand washing station of toilet wasn't provided.	The hand dryer was provided.	To train hygiene operator check handwashing facilities regularly. To update the checking frequency.	The hand dryer of toilet was not purchased.	2023-12-31	Rupert Rao

Comments on non-conformities

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None

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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

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Detailed Section

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

The safety and quality policy are signed IN ac-qm-2023 version A/0 by GM on 2023-02-01. Safety and quality policy statement is clearly defined covering legality and product safety requirements.
The policy is communicated to all levels of staff by management team.
Policy: Quality first, customer first, striving for excellence, continuous improvement.
Summary of targets sets such as:
The first test finished product qualified rate over 98%;
--No food safety complaint

--customer satisfaction level over 90%

--dispatched product qualified level 100%

The KPI is communicated through meeting, e-mail, training course, bullet board and we-chart. The monitoring result showed that they had improved all along.
For example:
--No food safety complaint

--customer satisfaction level 93.5%

--dispatched product qualified level 100%

The senior manager who has been involved in the discussion in food safety culture and the activities planned to develop the Food Safety Culture is QA Manager, Production Manager, HR Manager, MT Manager and all other function department. It is implemented at activities of discussion for all employees with effectiveness evaluation and the future plan is also purchased from BRCGS website to improve food safety knowledge.
Example for: Investigation for product safety culture (such as HACCP, complaint, foreign bodies control, pest control, food safety training/food safety onsite management) is performed, the related score with good or positive is gained and evaluated, action plan is established, quality meeting monthly to share with staffs and add more culture board and related training course and then monitor the completion rate of the training courses. Based on investigation result, measures including training are taken, improvement suggestion, race and discussion in bulletin, meeting. Good shift & team will be rewarded. Summing-up, commending and verification are taken for measure according to BRCGS guidance. The latest evaluation of effectiveness performed on 2023-02-08.
GM has committed to provide human resource and financial resource to support BRCGS standard and maintained product safety and quality management system.
Company has established action plans to address the activities impact on product safety for development and improvement of the food safety and quality culture. The senior manager who has been involved in the discussion in product safety culture and the activities planned to develop

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the Food Safety Culture is QA Manager, Production Manager, HR Manager, MT Manager and all other function departments.
The company keep up to date with legislation and scientific changes through supplier, government department, BRCGS, customer and internet.
Channels of meeting, e-mail and board notice are implemented according to organization structure chart following employee - manager- (HACCP team leader)-GM.
Example for:
2023/2006
AP 2002-1
AP2004-2
GB4806.8-2022
FDA 21CFR178.3800
EU 1935/2004
EU 1895/2005
GB4806.1-2016
GB4806.12-2022

Current and original copy from BRCGS PM issue 6 is found onsite.
Management on site attend the opening meeting and closing meeting.
This is the initial certification.
No BRCGS logo used.

1.2	Management review

The frequency is once every year. The current management review is conducted on 2023-12-19 charged by GM. Objective is reviewed in meeting. Outputs are 2 suggestions:
--cleaning of workshop
--workshop facilities
Monthly meeting about management is also conducted to enables product safety, legality and quality issues to be brought to the attention of senior management and allows for the resolution of issues requiring immediate action.
Example for monthly meeting record of 2022-12-16 for following reviews:
---sample management and communication
--quality control
---pest control

1.3	Organisational structure, responsibilities, and management authority

Quality manual organisational chart and responsibilities are defined, including those with an impact on product safety, legality and quality. Clear organization structure is established covering all business processes.
The organisation chart is defined on 2023-02-01. Responsibilities are documented in job description of each position.
Documented arrangement in place to cover for the absence of key staff: 2023-02-01.
Work instructions are available, communicated and in place for staff that responsible for every key activity related to product safety, legality and quality.
Communication channel includes GM- management representative (Team leader) – department-operator and versa.

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Non-applicable clauses	1.1.7/1.1.9: the initial certification.

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

HACCP is approved on 2023-02-01. 7 HACCP team members are trained with HARA, risk assessment & BRCGS PM requirement in February 2023 by Consult Company. Team members are from different departments. HACCP team leader had over 5 years industry experiences.
The internal HACCP training course is performed on 2023-03-15.

2.2	Hazard analysis and risk assessment

Pre-requisite plans defined in respective procedures, such as cleaning, pest control and foreign bodies control, control procedure and record is kept on file.
Relevant information such as scientific literature, historical and known hazard, regulations of destination countries, and HACCP guidance are used as reference for HACCP analysis.
The product scopes are clearly identified in HACCP Plan. The potential hazards for all steps are identified and conducted hazard analysis and control measure are established, monitored, verified and recorded. Product scope: disposable bamboo and wooden cutlery for food use.
Training and meeting reviewed for HA. Consideration such as:
2023/2006
AP 2002-1
AP2004-2
GB4806.8-2022
FDA 21CFR178.3800
EU 1935/2004
EU 1895/2005
GB4806.1-2016
GB4806.12-2022

Product description:
--Product: Wooden/bamboo cutlery
--Composition: Wooden/bamboo
--use: food and beverages contact, lower than 168 degrees
--shelf life: 1 year.
--packing: in bags then in cartons or inside woven bags on pallets.
Main processing flow diagram is as following:
pre-treatment, molding, hot stamping or not, UV disinfection, sorting and packing for tableware.
Flow diagram is verified on 2023-09-01.
The hazard analysis is considered with microbiological hazards, chemical contamination, potential for unintended migration of substances from the packaging material, foreign objects, potential problems arising from the use of recycled materials, foreseeable misuse by the consumer, defects critical to consumer safety, hazards that may have an impact on the functional integrity and performance of the final product in use, malicious intervention and fraud. In a totally review:

Biological hazard: Pathogen such as Salmonella

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Chemical hazard: Overall migrations, special migrations, evaporation residue, K4MnO4 consume quantity and heavy metal;
Physical hazard: Pest, Metal, wooden pieces
defects critical to consumer safety: Error artwork and information on safety on cartons;
Fraud: Material difference
Quality hazard: Width, broken, scratch, broken, sharp, color deviation.
Potential hazards are evaluated with likelihood of low to high and severity of low to high then risk grade of low to high was gained through risk matrix, risk grade was defined as low and high after risk assessment, then assessments were conducted based on the following selection and categorization.
After hazard analysis, CQP/CCP (HACCP plan) then planned.

CCP1: molding. Mold temperature is 155-165 degrees/7-12s, monitoring once every two hours.

CCP2: selecting. No foreign bodies, mold, check every one.

The monitoring system, corrective action is established for CCPs and monitored by trained staff. The documentations and records related with product quality and safety are kept in suitable condition.

However, Major deviation is raised for clause 2.2.12.

Non-applicable clauses	None

3.	Product safety and quality management

3.1	Product safety and quality management system

Manual no AC-QM-2023 A/0:
Implemented: 2023-02-01
Approved: GM.
Working methods and practices are documented within FSMS manual. The manual is Chinese version and comprehensive and covered all BRCGS PM requirements.

3.2	Document control

Working methods and practices (AC-QP-01 issue 2023-02-01) are documented within product safety and quality control system. The manual is comprehensive and covered all Standard requirements.
The controlled document list is established and indicated the latest version number.
The document replacing system is implemented.
The electronic form is stored with authorised access, control of amendments and password protection, it is backed up to prevent loss.

3.3	Record keeping

Quality records control procedure (AC-QP-02 issue 2023-02-01) is established and implemented.
Records are maintained in good condition and retrievable, any alterations to records will be authorised and with "Draw a horizontal line and add correct word & signature".

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The electronic form is stored with authorised access, control of amendments and password protection, it is backed up to prevent loss.

3.4 Specifications

Specification list is established for incoming material, process and finished products based on national and EU standard such as:
GB4806.12-2022 bamboo product and wood product directly food contact
GB4806.8-2016 Wood and paper contact food directly
GB4806.1-2016 Material contact food directly
165mm knife: AC-GG-01 reviewed on 2023-08-08

Raw and finished product specifications are agreed with relevant party through document contract or e-mail confirmation. Manufacturing plan is established and implemented according to prescriptive specifications.
Declarations of compliance are reviewed onsite such as recommend letter from supplier and to customer that complied with EU/USA requirement, such as: 2023/2006 for GMP.
The declaration of compliance contains contents such as: the nature of the materials, confirmation that materials meet relevant legal requirements, no any post-consumer recycled materials, limitations, no allergens and use information.
Company also qualified each material to the third party to confirm to its conformity.
Evidence shows that specifications had been regularly reviewed and updated according to relevant requirement. Review frequency is at least once every 3 years.
Example for wood knife 165 mm:
clear, recipe, reference standard, usage, incoming materials, no allergens, technology, standard GB4806.8-2022 such as size, weight, shelf life and storage conditions, appearance, overall migration limit, heavy metal, packing requirement, labelling, reviewed on 2023-08-08.

3.5 Internal audits

AC-QP-18 issue 2023-02-01 internal audit procedure is established. The internal audits must be done at least once a year and frequency based on risk analysis. The latest internal audit is performed this year, 4 minor deviations are raised during internal audit as following:
---audit on 2023-03-15/16: 1 minor deviation is raised
---audit on 2023-06-28/30: 2 minor deviations are raised
---audit on 2023-09-11/12: 1 minor deviation is raised
---audit on 2023-12-05/06: no deviations

Inner auditors are trained of BRCGS PM and HACCP. Internal auditor didn't audit their own works. The responsible person and deadline for corrective action are defined if CAR raised. The performance of the corrective actions will be monitored by QA. (Corrective actions for all non-conformities are verified by internal audit team).

The factory environment combined GMP including hygiene and fabrication is inspected at least monthly, and the inspection and check record is in place. The processing equipment in the workshop is inspected and checked, and the monthly GMP check record of 2023-09-12 is provided.

3.6 Corrective and preventive action

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The company has established corrective & preventive action procedure AC-QP-21 issue 2023-02-01 to ensure investigation of the root cause of non-conformity will be performed and corrective actions will be taken.
Main steps include:
1. Take corrective actions
2. Analysis and determine the root causes
3. Identify and determine the preventive actions.
4. Carry out preventive actions.
5. Verification of actions.

Any out of control specification would be regarded as non-conformity and reported to QA. The non-conformity would be identified, assessment of consequence, correction and root cause analysis and verification of corrective action effectiveness as well as the trend analysis.

3.7	Supplier approval and performance monitoring

A purchasing control procedure AC-QP-08 issue 2023-02-01 is in place for approval and monitoring of all suppliers.

A list of approval suppliers is in place, which is updated regularly according to supplier assessment results. For supplier controls:

1. Questionnaires were used to assess low risk supplier, which were done yearly. The supplier questionnaires included traceability controls, quality controls and safety controls.
2. On-site audits were done or GFSI certificate for high risk and middle risk suppliers.

All suppliers must be approved at the first and then entered into the system before they can be used. High risk supplier includes new bamboo supplier and others are low risk supplier.

Where raw materials were purchased from companies that are not the manufacturer, necessary information to enable the approval of the manufacturer will be obtained.

A plan is in place to carry out ongoing supplier performance review, mainly considering such as：
1. Quality and safety; 2. Complaint handle; 3. On-time delivery; 4. Service
Review reports were in place.

The exception control procedure has been documented and will be followed once any exception occurs.

No any new supplier within one year.

Example for assessment records for original supplier:

Incoming wood AC-HM230801
Wood supplier is evaluation such as license, QU, traceability record, evaluation report of onsite audit on 2023-05-19, performance score is 92%.

Receiving date: 2023-08-01, inspection such as material, appearance and plant quarantine certificate. Quarantine certificate: origin wood with inspection of pest and expiry date.

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PE bag supplier: evaluation such as license, SC, QU, DOC, performance score is 95%.

3.8	Product authenticity, claims and chain of custody

The facility establishes the processes to access information on threats to supply chain and implemented documented vulnerability assessment, through taking into account of historical evidence, economic factors, complexity of access and testing, and nature of raw materials. The assessment date is 2023-08-10. Example for incoming material adulterating this material (unauthorised size: such as testing report, mark information, packing condition, appearance checked and transport information).

All the control methods are detailed and implemented.

3.9	Management of subcontracted activities and outsourced processes

N/A. no subcontracted activities and outsourced processes.

3.10	Management of suppliers of services

A documented service supplier approval policy is defined.
The service servicers and qualified certificates are collected and evaluated its performance annual. This included: waste service, transportation service, some maintenances, calibration and lab service. The related contracts are kept on files.
Example for: waste control service contract with contractor local EPA and signed on 2023-01-01 and expired to 2023-12-31.

3.11	Traceability

The company had in place an identification and traceability control procedure AC-QP-11 issue 2023-02-01 based on paperwork during processing which made the company able to trace materials from raw material source to finished product and vice versa.
The company ensured the traceability of all materials used for its products, such as:
Batch number for raw material: receiving date or order no
Packaging: receiving date or order no
Processing semi-finished product: production date
Finished products: production date or order no
The traceability system is tested yearly. Last traceability test on 2023-07-12 for wooden fork batch no AC-C230606 quantity 395450 pcs to incoming wooden c23-012 with quantity check, timescale 1 hour+30 mins.

Onsite auditing sampled:
Finished wood knife batch no AC-D230806, quantity 350 ctns
Warehousing: 2023-08-14
Pre-treatment 2023-08-10/11
Drying and polishing 2023-08-12
Molding: 2023-08-13
UV disinfection: 2023-08-13
Sorting and packing: 2023-08-14

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Incoming wood AC-HM230801
Timescale: 1 hour 40 mins
100% recovery
However, Minor deviation is raised for clause 3.11.2

3.12	Complaint handling

Complaint data with trends and actions taken is kept on file.

Sales department collects complaints from clients, and then deliver it to QA department. The root of cause is analysed by QA. And related person will take actions.
Complaints records will be retained on file, no any complaints are received and dealt. Trend analysis will be conducted to ensure continuously improvement if trend happened.

3.13	Management of product withdrawals, and incidents and product recalls

The incident control procedure AC-QP-23 issue 2023-02-01 defines how to control and manage effectively incidents and potential emergency situations that impact food safety, legality or quality such as:

- disruption to key services such as water, power, transport, staff availability and communications
- events such as fire, wind, flood or natural disaster
- malicious contamination or sabotage
- failure of or attacks against, digital cyber-security
- COVID-19 with control such as responsible access, temperature measuring, registration, segregation

Last fire emergency test dated 2023-07-25 with records retained.
No actual recall by far.
The product recall procedure is tested annually. It was defined in the procedure that in the event of a product recall, SGS shall be informed within three working days of the decision to issue a recall.

Mock recall report initialled by the factory on 2023-07-12 for wooden fork batch no AC-C230606 quantity 395450 pcs, designed quality problem, mock recall includes trace test, communication plan, recovery calculation (recovery 100%). The scenario considered by the recall team included a test of the decision making of the team and how they decided if the scenario would result in a recall or withdrawal.

Non-applicable clauses	None

4. Site Standards

4.1	External standards

There is only one building in plant, 4 storeys:
1st floor for incoming material warehouse and pre-treat, 1 storey
2nd floor for molding, UV disinfection and packing, 1 storey
3rd floor and 4th floor for packing and finished product warehouse

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The boundary walls with 1 guard room at entrance of plant.
The building of the factory is maintained with investments regularly planned.
The grounds and parking lots of the exterior are graded to prevent standing water.
The building is kept in normal condition to prevent accesses of contaminations.
No local activities around the factory that would risk product contamination.

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

Walls: cement and/or with paint or steel boards
Floor: cement and/ or with paint.
Entrance: air shower, hand washing facilities, changing room with hand washing facilities
On site verification, the fabrication of the buildings and facilities such as the wall and floor are suitable for the intended purpose.
Walls, floors, drainages, doors, ceiling and overheads are regularly maintained.
No mould growth on the wall.
In the workshop verification, floors are designed to meet the requirement of the process. And drainage is designed and maintained to minimise risk of product contamination.
No stagnant water is observed.
Existing glass windows fitted with shatter checking regularly.
The UV lights aren't protected but those are checked, and the check record is provided.
Exhaust fans are in place and routinely checked.
Minor deviations are raised for clause 4.2.4 and clause 4.2.7.

4.3	Utilities

Potable water: filtered potable water, soft water and then RO system. The water is used for plant cleaning and processing.
Testing report of potable water: issued on 2023-11-10 indicators such as formaldehyde, arsenic, cadmium, lead, mercury, fluoride, chloroform, carbon tetrachloride, color, smell and taste, total radioactivity and Escherichia coli, standard refer to GB5749-2006.
Vapour is used to heat wood or bamboo in RO water.
Compressed air is used to switch. It is filter at making process.

4.4	Site security and product defence

Food defence plan AC-FHJH-01 issue 2023-02-01 is established and evaluated yearly and last dated on 2023-08-15. Last in- house training dated on 2023-08-20. Enclosed site with 24-hour security staffs.
Production areas and warehouses are restricted areas and monitored via CCTV, visitors are not permitted enter except accompanying person presence.
Gatekeeper is responsible to control entrance of employees, contractors and visitors and persons would not be permitted to enter the factory without authorization.

4.5	Layout, product flow and segregation

There is effective segregation in place to minimise the risk of product contamination, the plan of the site which designates areas where product is at different levels of risk from contamination is defined in PRP:

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--Raw material inspection zone- low risk area
--processing - high risk area for workshop
--Finished product storage zone – low risk area
Detailed plan of the site including access points for personnel and travel routes, location of staff facilities and routes to the facilities from places of work, production process flow, routes for the removal of waste is in place.
Working space and storage are sufficient to enable operations to be carried out properly under safe hygienic conditions.

4.6	Equipment

Most equipment contact surfaces are made of stainless steel. Engineers aware of the requirement. Equipment have been specified before purchase, and then tested and commissioned prior to use.

Equipment is positioned normally to facilitate cleaning and service. Equipment is positioned to facilitate cleaning and service.

4.7	Maintenance

In-house engineers reported to maintenance supervisor who operated documented maintenance plan.
Total 2 maintenance employees exist in the factory. The device and equipment will be maintained as designed maintenance schedule, and the maintenance record is reviewed.
If temporary repairs are necessary, safety of product will be protected.
Tools and parts into workshop are count and collected at beginning and finishing, relevant records are in place.
No major breakdowns in last 12 months.
Food grade lubricant with NSF H1 registration no 145841 is used.
Documented hygiene inspection on start-up completed by production managers.
Maintenance room is separated from production area and is tidy during the audit.

4.8	Housekeeping and cleaning

Housekeeping and hygiene systems defined cleaning objects, cleaning methods, frequency, used chemicals, operator and safety requirement and detailed as:
Cleaning is done by appointed operator
After finishing work, each batch and changeover
Ethyl alcohol is used in the product contact surface as the disinfector
Verification of the cleaning and disinfection by visually check and testing is demonstrated: daily cleaning visually check by QC
Company will identify improvement point from result of verification if non-conformity happened.
The trend map is kept on file. No non-conformity is found based on history of trends.
During audit on site, ceiling, the equipment, tools, the surface of the contact food, wall in the cleaning manner. Training records are in place.
Based on risk and client requirement, the microbiological environmental monitoring programme is established, assessment report is performed based on risk such as heat pre-treat, UV disinfection, workshop used, history and microbe testing for finished product regularly, hygiene control condition, cleaning plan and facilities, awareness and client requirement. The assessment is

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conducted on 2023-08-15. the result: testing indicators such as TPC and Coliform for hand, M/C, environment and protective clothing, testing frequency is yearly, the latest test is performed on 2023-11-13.

4.9	Product contamination control

4.9.1	Glass, brittle plastics, ceramics, and similar materials control

Glass and brittle material control procedure is developed.
The procedures for handling glass, brittle or hard plastic, ceramic or other materials include the requirement to inspect on a frequency monthly.
The list of the glass and brittle material is available; the inspection records are seen and specify the responsible persons as well as the result and the date.
Example for checking record between October 2023 and December 2023.

4.9.2	Sharps and metal control

Documented policy for the control of the use of sharp metal implements including scissors, knives is in place and there is daily inspection record for damage and the investigation of any lost items.
Staples and wooden tools are not allowed in the open product area.

4.9.3	Chemical and biological control

Documented chemical control procedure with a reference of SSOP5 is in place, the approved chemical list and relative MSDS are in place, for example, MSDS and testing report of alcohol is reviewed. Cleaning chemicals stored in a locked room, restricted access.
Chemical list includes: such as hand washing soft soap, 75% alcohol and lubricant oil.
Risk and risk analysis for microbiological hazard is conducted in risk management risk analysis sheet. It is used to identify biological risk and allergen and control these risks such as:
No allergens based on investigation in lubricant.

4.10	Waste and waste disposal

Disposal is normally managed. External waste collection container is cleaned in time. External waste is stored in sealed container. Collection containers are available with label and cover. Plant clean external waste collection containers regularly. Unsafe products or substandard trademarked materials are handled to be destroyed by own staffs at first with control record and then confirm with contractor.

4.11	Pest management

Documented preventive pest control programme is maintained covering all areas of the site to minimize pest infestation.
undertaken by the qualified PCO, the staffs are adequately trained by CDC, keep up to date with pesticide legislation, and dedicated locked facilities are used for the storage of pesticides.
procedure defined in the event of infestation, or evidence of pest activity, immediate action needs to be taken to identify at-risk products and to minimise the risk of product contamination and any potentially affected products should be subject to the non-conforming product procedure. No any such events are happened.

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frequency is once every two months for November to April, twice monthly for other months.
target organisms including: rodent, fly, cockroach, culex.
device include trap, pest killer, glue board and bait station.
non-toxic bait is used.
pest control plan, maps and visit reports (frequency is at least monthly).
during onsite audit the inspection records between October 2023 and December 2023 are sampled for viewing.
during onsite audit no pest infestation happened.
no any major instances since the previous audit.
An in-depth, documented pest control survey is conducted yearly, and onsite inspection survey dated on 2023-10-08.
The relative trending analysis of the pest control quarterly.
Employee pest control aware training is performed on 2023-07-19.

However, Minor deviation is raised for clause 4.11.4.

Non-applicable clauses	4.2.6: no elevated walkways are adjacent to or pass over production lines 4.4.3: No external storage tanks, silos and any intake pipes with an external opening

5. Product and process control

5.1 Product development

Product formulation is established. The manufacturing processes have been trialled and product extensively tested to ensure compliance with agreed customer specifications. All new products and changes to product formulation, packaging or methods of processing are formally approved by the risk management team members, and it is checked, the reports for new products are in place.
The critical-use parameters are identified and defined such as max/min use/storage temperature, process data, use of recycled materials, size, color, thickness etc. all data defined to conduct test in sampling plan.
The safety and legal issue are confirmed by clients. In the system, the R&D is responsible for the informing the recipe/process defined in the trials to the clients via the sales/ customer service staffs.
The trail samples are kept in place.
A documented procedure is in be in place to address the transfer of customer specifications or requirements to the site's own systems. It is charged by R&D and guidance with hazard and risk management team.
Example for R&D report for fork 160mm.

5.2 Graphic design and artwork control

Graphic design and artwork control procedure is established.
Graphic and artwork control procedure including graphic control.
Graphic design was responsible for customer and provide the artwork to factory.

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The formal acceptance and approval of final product concepts is signed by client or e-mail with picture of sample, it is validated that the agreed product quality standards at start up and regularly.
Customer-approved reference material including e-mail is stored and segregated / controlled well.

Example for wooden spoon: spec AC-GG-03, 160mm, size length +/_5mm, width +/_3mm, thickness +_0.2mm, handle +/_2mm, moisture less than 12%, natural wood color, not stamping, artwork AC-GG-03.

5.3	Packaging print control

The decoration of hot stamping is through electronic heating with mould on product. The artwork is confirmed through client before production.
The hot stamping is passed through start-up and regularly checking during process. Hot stamping temperature is defined in SOP.
Effectiveness of hot stamping through check for standard sample. The sample is confirmed by client.
Hot stamping mould is kept in good condition: shelf of warehouse, well labelled.

5.4	Process control

SOP operating procedure has established.
The following critical manufacturing process control points are defined after review:
Molding: AC-WI10 version A/0, to control molding temperature, pressure and time.
Stamping: AC-WI11 version A/0, to control pressure, temperature and M/C speed.
Operating procedure is implemented.
Quality check is performed as the requirement of designed plan, quality performance and SOP of each process control point with sampling plan according to GB2828.
Checking is conducted at start up, processing regularly and at the edge of stopping.

However, Minor deviation is raised for clause 5.4.7.

5.5	Calibration and control of measuring and monitoring devices

Calibration for the testing and measuring device control programme AC-QP-16 is developed and covering following:
checking frequency
checking methods
trained staff to carry out the checks when the device shall be internal calibrated
Operators are aware of the procedures to be undertaken.
Measuring and monitoring devices has been calibrated by government department according to national standard and calibration certificates have been maintained in time in plant.
Example for:
Moisture M/C for wood: certificate no LX18-2308-0198, type HT-90D, serial no QC03598, issue 2023-08-29
Steel rule: certificate no GE202304240200, type 150mm. issue 2023-04-24

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5.6 Product inspection, testing and measuring

Lab inspection rules are in place for all materials and environment.
The company has an in-house laboratory to undertake analyses or qualified inspection by subcontracted labs to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.
Main raw materials checking items such as:
Incoming material: quarantine certificate, colour, size, foreign bodies, pest and COA: once/ each batch
Semi-finished product: appearance, moisture, colour, size, weight, strength, dropping test and leakage test: once/ batch
Finished product: ink quality, colour, size, water content, weight, appearance, strength test and chemical migration test: once/batch
The trend analysis is performed yearly. Company will identify improvement point from result of verification if non-conformity happened. The trend map is kept on file.
Test final products refer relevant regulations by government lab and subcontracted labs. Outside labs test indicators such as overall migration, heavy metal and extraction.
Example for testing report of bamboo mix: testing report issued on 2023-12-08 according to US FDA 21 CFR 178 3800, indicator such as specific migration of formaldehyde, Pentachlorophenol (PCP).
Example for testing report of wooden mix: testing report issued on 2023-12-08 according to US FDA 21 CFR 178 3800, indicator such as Pentachlorophenol (PCP).
Example for testing report of bamboo mix: testing report issued on 2023-12-07 according to EC 1935/2004, indicator such as extractable lead, extractable cadmium, extractable mercury, sensorial examination odour, sensorial examination taste, PCP, 3% acetic acid.
Example for testing report of wooden mix: testing report issued on 2023-12-08 according to EC 1935/2004, indicator such as extractable lead, extractable cadmium, extractable mercury, sensorial examination odour, sensorial examination taste, PCP, 3% acetic acid.

5.7 Control of non-conforming product

AC-QP-17 issue 2023-02-01 Nonconforming product control procedure is defined and implemented.
Clear process well understood by staffs that are interviewed during the audit. Special container in special area for non-conforming products are provided and stored separately.
For incoming material: rejection in time, responsibility is QA receiver;
For semi-finished product: production operator must be isolated and label non-conforming product, QA responsible for assessment and evaluation;
For finished product: test finished products and isolate/evaluate the non-conformity, QA responsible for evaluation and handling and making a loss.

Procedure defines how to handle and conduct potential trend analysis.

The statistic of non-conformity product is conducted by QA operator, any potential trend is performed in corrective action report based on each quality levels such as size, appearance, colour etc.

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The potential trends are reviewed in management meeting and corrective action will be followed in next circle.

5.8	Incoming goods

Receiving procedure is established for each incoming material. Purchase order/ deliver sheet, COA, label and packing condition is checked at first according to receiving standard, then material sampling to check appearance, size and testing in lab based on receiving standard, material will be rejected if non-conformity happened. Raw material and packaging material inspection and test procedure is established and implemented.
The received materials are verified by authorized person such as QA prior receiving.
Materials then are stored in incoming materials warehouse and labelled and used by FIFO rule.

5.9	Storage of all materials and intermediate and finished products

All materials are separately stored in the storage.
All the materials are required to store on the pallets and away from floor. The stock rotation is based on FIFO system.
Chemicals are handled in such a way that risk to product safety, quality and legality is minimized.
Material intended for recycling is segregated and labelled.
Normal temperature for storage only.

However, Minor deviation is raised for clause 5.9.2.

5.10	Dispatch and transport

Document transportation control procedure is in place and during the audit, the loading area is clean, the condition is followed the transportation requirements.
The warehouse employee will inspect the container before loading. The inspection item: cleanness, pest activity and dilapidation. The container is not passed until inspection results is OK.
Raw material and packaging transport arranged by suppliers.
Finished products are shipped with the third-party company. All facilities used for the transportation of product, movement around the site, and dispatch of finished product are suitable for the purpose, maintained in good repair and in a hygienic condition.

Non-applicable clauses	5.3.5: no composite print 5.6.3/5.6.6/5.6.9: no in-line inspection equipment

6. Personnel

6.1	Training and competence: raw materials handling, preparation, processing, packing and storage areas

Training records for all personnel, including temporary personnel and contractors are in place.

Training plan is in place, the training items are detailed including testing, operation guidance, chemical control, safety control, CCP/HACCP, ISO9001, GMP and BRCGS PM.

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Training methods include meeting room course and onsite training. For CCP training, each CCP point is trained at first in meeting course with questionnaire and then onsite operation training. The training result is evaluated by trainer based on meeting room course and onsite training. Example for the latest HACCP/CCP training course is performed on 2023-03-15.

Evaluation for staff is conducted through site operation, antitheses, examination or discussion. Employee can't conduct work if training not passed.

The competencies of its staff are reviewed at least once a year, and related training is performed based on evaluation result.

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

Documented personal hygiene control procedure GMP is developed and implemented. Hand cleaning is performed at a reasonable frequency and the effectiveness of hygiene procedure is checked periodically.

No jewellery, rings are worn by the employees and managements. And it is checked and monitored by the appointed employee before into the workshop.

Documented processes and SOP are in place to control use and storage of personal medicines, personal medicines are not permitted to take into workshop, medicine are kept in office for storage. Training of staff is conducted.
However, Minor deviation is raised for clause 6.2.3.

6.3	Staff facilities

Sufficient hand-washing facilities are provided at the entrance of workshops.

Hand washing station provided at each processing workshops entrances;

- Taps are hand-free
- Disinfection is realized via 75% ethyl alcohol
- Hand washing policy is defined and posted

In the processing zone and packing zone, the dedicated protective clothing is used, and the pointed employee checked the hygiene policy

Toilets are adequately segregated and do not open directly into storage

Men and woman toilets are adequately segregated and do not open directly into storage.

Personal items include outdoor clothing are stored in small closet in changing- room, no food is permitted in production and store area.

Designated smoking room located outside the production area and storage area, and no risk from smoking wastes to product.
However, Minor deviation is raised for clause 6.3.6.

6.4	Medical screening

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The medical screening procedure GMP is in place for all employees or visit who will work in or visiting area where product safety could be compromised.

The health check for relative employee is carried out at least once per year and the licenses are retained on file.

When employees suffer disease and return to work after recovery, reporting system is established to monitor and confirm this condition.

Documented SOP in GMP is established for employees, contractors and visitors may be suffering from or have been in contact with infectious disease. Personal will be investigated and provided with health / health report and then can enter workshop and storage areas.

6.5	Protective clothing

Each employee has at least 2 work uniforms including caps, coats, pants and work shoes according to different risk grade.

Protective clothing is different form in different risk area and position. The changing room to workshop based on risk area is performed.

Hands washed and sanitised before entering production area.

Completed protective clothing should be put on before entering workshop, visitors and contractors. Protective clothing must be changed in changing room before to toilet and use of canteen and smoking areas outside workshop.

Protective clothing is cleaned by company laundry by operators. Instructions are trained to operators. Clean bag for pack is defined, clean of protective clothing is checked during receiving with checking record.

Disposable glove is provided to employee and changed every shift or needed.

Mask is disposable and changed every day.

Non-applicable clauses	6.4.3: it can contact food directly. 6.5.8: it is cleaned inside company laundry

Requirements for traded products

7.1	Approval and performance monitoring of manufacturers/packers of traded packaging products

N/A. No traded products.

7.2	Specifications

N/A. No traded products.

7.3	Product inspection and laboratory testing

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N/A. No traded products.	
7.4	Product legality
N/A. No traded products.	
7.5	Traceability
N/A. No traded products.	
Non-applicable clauses	7.1/7.2/7.3/7.4/7.5: No traded products.

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Additional Module: Plastic Pellet Loss Prevention	
10.1.1	Senior management commitment and control improvement
N/A. No module.	
10.2.2	Hazard analysis and risk assessment
N/A. No module.	
10.3.5	Internal audits
N/A. No module.	
10.3.6	Corrective and preventive action
N/A. No module.	
10.3.13	Management of incidents
N/A. No module.	
10.4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas
N/A. No module.	
10.4.4	Site security
N/A. No module.	
10.4.5	Layout
N/A. No module.	
10.4.8	Housekeeping and cleaning
N/A. No module.	
10.4.10	Waste and waste disposal
N/A. No module.	
10.5.8	Incoming goods
N/A. No module.	
10.6.1	Personnel: training and competence

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N/A. No module.	
Non-applicable clauses	10.1.1~ 10.6.1: No module.

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