

Audit Report

Global Standard Agents and Brokers Issue 3:October 2021

1. Audit Summary			
Company name	JustIngredients Ltd	BRCGS Site Code	1203932
Operation	Broker		
Services	Distribution	Product categories	2 - Ambient food
Scope of audit	The brokerage of herbs, spices, botanical herbs, food oils, whole foods and supplements in bulk and finished product formats including the management of services relating to distribution.		
Exclusion from scope	None		
Audit Start Date	2023-11-16	Audit Finish Date	2023-11-16
Re-audit due date	2024-12-02	Audit frequency	12 months

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit Programme	Blended Announced
Certificate issue date	2023-12-18	Certificate expiry date	2025-01-13		
Previous audit grade	AA	Previous audit date	2022-11-25		

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

Number of Non-Conformities	Critical	0
	Major	0
	Minor	1

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Report No. 0673-A (2023)

Auditor: Paula Cross



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3. Company Details			
Address	Units 2-3 Tabernacle Road Wotton-Under-Edge Gloucestershire GL12 7EF		
Country	United Kingdom	Site Telephone Number	+44 1291 635 525
Commercial representative name	Sophie Chryssaphes	Email	sophie@justingredients.co.uk
Technical representative name	Jessica Kenyon-May	Email	technical@justingredients.co.uk

4. Company Profile					
No. of employees	25	No. of suppliers of products/services	4	No. of product categories traded	1
Other certificates held	Soil association				
Product safety incidents (e.g product recalls) in the last 12 months	No				
Regions actively exporting to	None	Regions actively importing from	None		
Major changes since last BRCGS audit	The company was bought by the Dani group in March 2023. Previous Technical Manager left the business, and the role is now covered by the Technical and Compliance Co-ordinator.				
<p>Just Ingredients and Cotswolds Health Products (CHP) are sister companies, owned by the Dani group and operating on the same site with employees working for both companies. CHP is an Agent and Broker repacking products and is the sole product supplier to Just Ingredients, which specialises in the supply of herbs, spices and whole foods through phone and website sales and to third parties. Just Ingredients has an annual turnover of approx. £2.8 million. The company has one HACCP plan covering products from CHP and the services of three distribution companies. The audit took place remotely within the re-audit window.</p>					

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Company Locations		
Site Name	Country	Audit Type (in person/remote)
JustIngredients Ltd	United Kingdom	Remote

5. Audit Duration Details	
Total audit duration	8 man hours
Reasons for deviation from typical or expected audit duration	Not applicable

Audit Duration per day			
Audit Day	Date	Start Time	Finish time
1	2023-11-16	09:00	17:10

Key Personnel		
Auditor_number	Name	Role
32172	Paula Cross	Lead Auditor
N/A		Please select

Present at audit				
Note: the most senior manager on site should be listed first and be present at both opening & closing meetings:				
Name	Title	Opening Meeting	Procedure Review	Closing Meeting
Jessica Kenyon-May	Technical & Compliance Co-ordinator	X	X	X

Document control			
CB Report number	0673-A (2023)		
Template Name	AB306 Agents & Brokers Audit Report Template v1		
Standard Issue	3	Template issue date	04/03/2022
Directory allocation	Agents & Brokers	Version	1.1

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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
1	1.2.1	The job descriptions do not include responsibility for product authenticity.	Wording added, “, which includes the responsibility for product authenticity.” to the job descriptions of the Purchasing Co-ordinator	To ensure that it is clear that product authenticity is covered, the wording has been added into the job descriptions of the Purchasing Co-ordinator and	We have a section on our job descriptions, under additional responsibilities which states that the employees will ensure all procedures are carried out	2023-12-14	K. Barcroft

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Minor							
			and Technical & Compliance Co-ordinator.	Technical & Compliance Co-ordinator.	in accordance with the company's BRC and ISO accreditations and GDPR requirements are adhered to and considered at all times, which we felt cover the responsibility for product authenticity.		

Comments on non-conformities
Not applicable.

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Additional Module Non-Conformity Summary Sheet – Meeting FSMA requirements (Module 6)

Critical			
No	Clause	Detail	Re-audit due 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 Audit Report

1. Senior Management Commitment

Senior management commitment and continual improvement

The company have a documented policy that states the company's intention to meet its obligation to supply safe, legal and authentic products to the specified quality, and its responsibility to its customers. The site's senior management have defined and maintained a clear plan for the development and continuing improvement of a product safety and quality culture. This includes defined activities involving all sections of the company that have an impact on product safety and quality, an action plan indicating how the activities will be undertaken and measured including the intended timescales and a review of the effectiveness of completed activities.

Objectives are defined to maintain and improve services, with clear measures of success, communicated to relevant staff, monitored and results reported at least six-monthly to senior management.

Management review meetings are undertaken at appropriately planned intervals and include a review of the performance against the Standard, a review of the objectives, and management of the systems in place on the site. Minutes of the meetings and any actions set are recorded and provided to relevant personnel.

The company have a demonstrable system ensuring that significant product safety, authenticity, legality and quality issues are brought to the attention of senior management to allow those issues requiring immediate action to be resolved.

The site demonstrated that adequate resources were provided to ensure the safety, authenticity, legality and quality of products supplied in compliance with the requirements of the Standard and the customer requirements for the site.

A system is in place to ensure that the site is kept informed of, and reviews, any emerging product safety, authenticity, quality or legality issues, industry codes of practice, and all relevant legislation applicable in the country where the product is intended to be sold or used.

The site have a genuine copy of the current Standard and are aware of any changes to the Standard or protocol.

Documented policy:

- Date: 03 April 2023.
- Reference: Just Ingredients Company Food Safety and Quality Policy Statement v6.
- Signed by: SC - Managing Director.
- Method of communication: Displayed on the staff room noticeboard.

Product safety and quality culture:

- Defined activities: Annual Food Safety questionnaire completed MAR 2023. Review of the format of questions in AUG 2023. Sent out electronically on Google Forms with 14 responses and data analysis. Monthly team meetings, Annual staff appraisals, Cotswolds newsletter with business updates. Suggestion Box requests are summarised on the culture plan and actions taken noted. Employee nominations. New activities planned for 2024 e.g., Team building activities.
- Action plan: 2023-2026 Culture Plan for Cotswolds Health Products and Just Ingredients.
- Effectiveness reviewed: OCT 2023, presentation of the questionnaire findings by JKM. Three key areas for action identified: 1. Technical team to give knowledge to staff on SOPs, micro limits and pesticides and also for warehouse and production staff. 2. Food safety training to be updated to a video. 3. Staff to be notified of new training available by the management team.

The documented objectives set by the site, which were seen to be clearly communicated to staff and performance reviewed at least every 6 months include:

- Objective: Labelling – Improve product label information available to final customer by providing a QR code on pack. Target 100% of packs by end of 2024.
- Objective: Packaging – Further sustainable (explore compostable packaging). 2024 Target of 25%.
- Objective: Risk Assessment Test Rationale QDOC 0014 – To be monitored and met 100%.
- Objective: To ensure that the top 50 product lines are in stock at all times (new objective for 2024).

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Date of last objective review: NOV 2023. Additional information for chilli heat added to all packs in 2023. Now moving to QR code for other additional information. Target of 5% compostable packaging met in 2023 and increased to 25% for 2024. Testing rationale met 100% in 2023.

Management review meetings:

- Typical attendance: JKM (Chair), SC (MD), TI (GM Cotswold Health Products)
- Frequency: Annually and in the event of significant changes or incidents.
- Date of last review: 02 NOV 2023.
- Outcomes and actions from last review: Comprehensive minutes of the meeting with all areas of the standard reviewed as required. Action arising: Organisation chart to be updated to reflect KO leaving the business.

Processes used to keep up to date with legislative changes, codes of practice and emerging issues: The site use a number of websites including FSA alerts, RASFF, as well as industry connections and EHO contacts to keep them up to date with legislation.

Registration with the local authority: Just Ingredients Ltd are registered as a food business with Stroud District Council. Last site visit 09 DEC 2021.

Review of non-conformances from the previous audit: One previous non-conformance has been actioned and closed out satisfactorily.

Use of the BRCGS logo and references to certification: The site use the BRCGS A&B logo on emails and internal documents in the approved format.

Organisational structure, responsibility and management authority

There is an organisation structure in place with clear lines of communication demonstrating the management structure of the business.

Systems were seen to be in place to demonstrate that responsibilities for quality, safety, integrity, and legality of the materials purchased, managed or sold are clearly defined and understood by all staff.

Employee responsibilities are in place for those responsible for product safety, quality and legality.

Responsibility for product authenticity is not defined. Communication and reporting channels are in place to report on and monitor compliance with the Standard. There is a documented list of deputies for those staff who are involved in decisions made in respect to the quality, safety, legality and authenticity of purchased, managed or sold materials or products.

Organisation chart reference: Just Ingredients organisational chart v7 dated 15 NOV 2023.

Summary of the management structure: The site has a small team with a Managing Director, General Manager and six department Managers/Co-ordinators (Finance, Technical, Purchasing, Marketing, IT and Systems, Sales). Each job title has a deputy defined on the organisation chart.

Staff awareness of responsibilities: Job descriptions are in place for key staff. e.g.

JKM - Technical and Compliance Co-ordinator (deputy is the General Manager).

A non-conformance was raised against clause 1.2.1 of the Standard - The job descriptions do not include responsibility for product authenticity. See Minor NC-01.

Non Applicable Clauses

Clause/Section Ref	Justification

2. Hazard and Risk Assessment

An experienced and competent Team Leader manages a food safety team who are all experienced in their field and have been able to demonstrate specific knowledge of the system, including issues relating to the materials or products, also the processes to ensure products from the supply chain meet the specific

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customers' requirements and any associated hazards identified in the supply chain / process. HACCP training and qualifications were reviewed for the Team Leader and a selected number of team members. The scope of the food safety plan has been defined and includes the materials, products and the management of the service activities involved and covered during this assessment.

A full description for each product or group of products that are purchased, managed or supplied has been developed, which includes all relevant information on food safety, quality, legality and authenticity.

The company has implemented and is operating a product safety plan for the processes for which it is responsible. This has been based on the principles of hazard and risk analysis including the Codex Alimentarius HACCP principles. The plan has been documented, systematic, comprehensive, fully implemented and maintained.

Team Leader: Team leader: TI (General Manager for CHP). RSPH Level 2 dated 04 DEC 2012 (HACCP Level 3 planned for DEC 2023).

Overview of the food safety team: Other team members: JKM: Technical and Compliance Co-ordinator – High Speed Training HACCP Level 3 on 30 JUL 2021, SC (MD) High Speed Training HACCP Level 3 on 05 JAN 2021.

Scope of the hazard and risk analysis: The scope of the HACCP system is the sourcing of the products, arrangements for the order fulfilment by approved suppliers, through to invoicing. Products are sold for either direct use by a consumer, or for inclusion in manufactured goods. The HACCP plan considers all raw materials and packaging. All products are ambient and considered low risk.

Overview of the process flow: HACCP002 process Flow Chart v6 issued 03 NOV 2023. The HACCP process flow includes supplier approval, order processing, order fulfilment by the supplier, dispatch and delivery to customer, returns handling.

Details of the hazard and risk analysis: HACCP03 Hazard Analysis version 08 dated 03 NOV 2023. The site has completed a detailed hazard analysis covering each process step that considers the physical, microbiological, chemicals and allergen risks. Each step is risk rated on a three-by-three matrix for severity and likelihood and includes the use of the decision tree to decide if a step is a CCP. All steps have been scored 1-3, where no action is required, with the exception of allergen risks at the labelling step, which is scored 4 i.e. hazards which are controlled by the pre-requisite program. No CCPs have been identified.

Control measures at each process step are detailed where applicable.

HACCP004: Pre-requisite programme v5 dated 03 NOV 2023.

Review of service providers hazard management plans: Service providers are BRCGS certified and/or have completed QDOC0013 Subcontractor Minimum requirements v3 dated 03 APR 2019 which includes the communication of changes (including HACCP) to Just Ingredients. Service Suppliers also complete QDOC 0012 Threat and Security Risk Assessment and QDOC SUPP 001 Food Supplier Due Diligence Questionnaire.

- David Hathaway Holdings Ltd. BRCGS Site Code: 8335624 expiry date: 07 DEC 2024. QDOC0013 Subcontractor Minimum requirements Signed 21 SEP 2020. QDOC SUPP 001 Food Supplier Due Diligence Questionnaire signed 04 APR 2018. QDOC 0012 Threat and Security RA completed 21 SEP 2022.
- Vosipse Ltd (storage managed by Cotswold Health Product as they own product up to point of dispatch). QDOC0013 Subcontractor Minimum requirements Signed 20 SEP 2022. QDOC 0012 Threat and Security RA completed 20 SEP 2022.
- Parcelhub (small scale parcel delivery only). Packets and parcels agreement signed by both parties 19 AUG 2021. No historic issues.

Process for monitoring effectiveness of controls: Open and regular communication with suppliers and monitoring of any NCs. Review of BRCGS certification status and performance monitoring. CHP audit Vosipse Ltd site in Wales.

Hazard and risk analysis review:

- Date: 03 Nov 2023.
- Summary of review: Addition of food oils to the HACCP scope. Update to the Team Leader as TI, since KO left the business.
- Reason for review: Annual.



Non Applicable Clauses	
Clause/Section Ref	Justification
2.2	The hazard and risk analysis study has not been undertaken centrally.

3. Product Safety and Quality Management System

Product safety and quality management systems manual

The sites quality management system covers the requirements of the standard and contains a range of policies, procedures and work instructions. Relevant requirements are readily available and communicated to staff as appropriate.

Overview of the system: The Food Safety Quality Management system covers the scope of the Global Standard for Agents and Brokers and contains the appropriate policies, procedures and documents/checklists.

How the requirements communicated to staff: Electronic documents are stored centrally on a cloud-based system with read only access for all staff.

Documentation control

There is an effective document control system in place that ensures only correct versions of documents, forms and procedures are in use at any time. There is a list of controlled documents indicating the latest version number. The requirements for the update and control of documents is documented.

Document control Index reference: QDOC001 Document Control List updated as a live spreadsheet.

Details of how documents are updated and controlled: Changes are implemented and controlled by JKM. Updated by revision number, date of issue, change details, issued by. e.g. Organisation chart update to v7 on 15 NOV 2023 for the addition of owners and update to technical, finance and purchasing roles.

Record Completion and maintenance

The site maintains genuine records to demonstrate effective control of product safety, legality, quality and authenticity.

Document retention: PCD04 Procedure for Document Control v6 dated 28 NOV 2022. Documents are held for a minimum of three years.

Records held by third-parties: Access to Cotswolds Health Products records and any approved supplier can provide information within 24 hours. Demonstrated during the traceability test.

Customer focus and communication

Systems are in place which ensure that the customers' requirements are translated to the suppliers of the materials or products in accordance with the applicable specifications and / or data sheets in place.

System for managing customer requirements: Just Ingredients have two customers with specific requirements: Ocado and Amazon, all other customers are individual website sales.

Overview of customer specific requirements: Detailed documents for Ocado (Ocado Operations Guide), Amazon (Amazon labelling and shipping requirements), with details such as minimum shelf life and packaging formats.

Communication of customer requirements: Amazon and Ocado requirements are available as packing instructions to the operators, including photographic standards.

Internal audit

The Company has demonstrated that it verifies the effective application of the Standard.

There is an internal audit plan in place, with the scope of audits including:

- Implementation of the product safety and quality management system.



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- Product safety plan.
- Product security and food defence.
- Product fraud mitigation plan.
- Procedures implemented to ensure the requirements of the Standard are met.

Audits are scheduled and undertaken at a frequency based upon risk and previous audit performance. Auditors are suitably trained, and impartiality is maintained, the audit plan is completed and is reviewed during the management review.

Internal audit reports have a defined scope and detail conformity as well as non-conformity, results are notified to the person responsible for the operational activity, or process and root cause identified to determine appropriate corrective action within agreed timescales.

Internal audit schedule reference: 2023 Schedule: QDOC 007 v13 dated 03 JAN 2023.

Internal audits are carried out on at least 2 separate dates spread throughout the year.

Status of the current schedule: Completed in 2023 to date as per the schedule.

Sample of the internal audits undertaken, and the report records reviewed:

Audit No: 23-02 Document control by CW on 03 MAR 2023. No NCs raised.

Audit No: 23-03 Product legality and labelling by JKM on 27 JUN 2023. No NCs raised, observation only for a procedure update. Completed 29 JUN 2023.

Audit No: 23-04 Supplier and service supplier approval by TI on 11 JUL 2023. No NCs raised.

Auditor training: CW and JKM – trained by Technical Input on 14 DEC 2021 and TI on 29 MAY 2019.

Specification for products

Product specifications are available in either the supplier's own format, or alternatively are translated to the format as required by the business.

Specifications are reviewed when changes to the product, process, formulation or a combination of any have been made, or at least every three years.

The site clearly demonstrated that it gains formal approval of specifications between all relevant parties where this has been identified as being required.

Specifications reviewed:

Product code 14HIM Himalayan Pink Salt (Fine) Approved by JKM on 21 JUL 2023

Product code 10BA Heat Treated Rubbed Basil. Approved by JKM on 21 JUL 2023.

Agreement of specifications: Cotswold Health Products database generates specifications in both the CHP and Just Ingredients format. Linked to the labelling system and after three years, the database requires action to review prior to generating further labels. Sold as generic Just Ingredients branded products.

Last specification review: All specifications are reviewed when there are any changes or a minimum of every three years.

Traceability

The site has a documented procedure in place to ensure the traceability of products or materials supplied is in place from the supplier through all stages to the customer, this includes the requirements to be translated into any of the service activities which take place.

Overview of the system and how it works: QCPRC 20 Traceability Procedure v3 dated 04 AUG 2022. The trace system works by batch number listed on purchase order, and the batch number is listed on invoice delivery notes to ensure traceability is maintained.

Last recall / traceability carried out by the client: Cinnamon Quills Batch DF3/169/1901. Completed on 21 AUG 2023.

Traceability test conducted at this assessment:

Dried Basil Batch Code 2970 Best before 30/04/25 Order Number 143220

03 MAY 2023 – Bulk product received into CHP. Total of 2010kg from Arcotrade Arab Corps (FSSC 22000 Expiry date: 05 SEP 2024).

05 MAY 2023 – First product dispatched to website customer.

01 AUG 2023 – Order No: 143220 received from WL Peters (website customer).

02 AUG 2023 – Order No: 143220 dispatched to WL Peters via Parcelhub (Dispatch Note: 143220).



Mass balance:
Total weight received: 2010kg.
Sold to customers: 1215kg.
Bulk packed into smaller sizes via productions in stock: 255kg.
Bulk still in stock: 540kg.
All stock of Batch Code 2970 accounted for.
Started 9:30 and finished 13:30.

Complaint Handling

The site has a detailed complaints system in place, all complaints are recorded and investigated. Actions resulting from the complaint are carried out promptly and effectively by appropriately trained staff and complaint data is analysed for significant trends where required. Root cause analysis is used where significant complaints occur.

System for recording complaints: PCD02 Procedure for non-conforming product, complaints and corrective action v7 dated 21 MAR 2022. Complaints are typically received by email and are entered onto a google sheet live spreadsheet: Action Log for Complaints and NC Products. Each complaint is assigned a case number YY-sequential number. Root cause analysis and investigation details are completed on the log.

Levels of complaints reviewed: 156 complaints received in 2023 to date. Significantly higher than 2022 due to improved recording system.

Details of the analysis of complaints undertaken: Top three issues: 46 complaints due to out-of-stock items. 30 cancelled orders by the customer. 16 complaints of short expiry date (less than 6 months). No foreign bodies received in the year to date.

Corrective and preventative actions

The site has a formal procedure for handling non-conformances, the food safety and quality management system, which includes a method of recording non-conformances and ensuring assessment of consequences by a suitably competent and authorised person, the responsible person and action to address the immediate issue within a defined timescale, and verification that the correction has been implemented and is effective.

In addition, there is a procedure for the completion of root cause analysis.

Non-conformities procedure details: PCD02 Procedure for non-conforming product, complaints and corrective action v7 dated 21 MAR 2022.

Root cause analysis procedure details: SOP17 3.9.1 Corrective action and Root cause Analysis procedure v2 dated 21 MAR 2023.

Complaint 23-332: Received 24 OCT 2023 Hand Selected Bay leaves Batch No: 2122190 – complaint due to brown and faded discolouration. Investigation concluded that the product had been stored on the top shelf and discoloured by sunlight. Corrective action to ensure boxes are closed during storage. Stock replaced and corrective action closed out on log.

Control of non-conforming product

The site ensures that the reporting of any out-of-specification materials or product is effectively managed to prevent unauthorised release.

There are processes in place at each stage of the supply chain process for managing non-conforming products, this includes the requirement to ensure that service providers are aware of the need to identify and hold or quarantine potentially non-conforming product, relevant to the location of the products in the supply chain, including defined responsibilities for decision-making on the status of the products and the ultimate decision as to the continued use or disposal of products and subsequent records.

Such requirements are clearly stated in the various service agreements and contracts within the supply chain.

Systems implemented to ensure controls are in place: PCD02 Procedure for non-conforming product, complaints and corrective action v7 dated 21 MAR 2022. Electronic hold on the stock system to prevent picking and dedicated Hold area within the warehouse. JKM is only authorised to remove stock from Hold.

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Product placed on Hold at Vosipse also, by electronic hold and status as 'unsellable' until released by JKM.

Management of incidents, product withdrawal and product recall

The site has a plan and effective system in place to manage incidents and enable the withdrawal and recall of products should this be required.

Procedures are in place to effectively manage incidents that impact food safety, legality or quality. This includes consideration of contingency plans in the event of disruption to the supply chain, the system also includes potential for sabotage, failure of, or attacks against digital cyber security.

Key personnel are involved in assessing potential product withdrawals and the process is managed by the senior management team.

Within the procedure the following activities have been included:

- Identification of key staff.
- Guidelines on the criteria for a product to be withdrawn or recalled.
- Key contact list, including notification to the CB within a specific number of working days.
- Communication plan.
- External agencies to be contacted.
- Logistics plan for any product recalls instigated.
- Disruption to key services.
- Events such as fire, flood, or natural disaster at suppliers' premises.

Disposal of out of specification items, dependent on where the product is located in the supply chain.

The site has included in its system the requirement that the certification body shall be notified within 3 working days of any significant product safety incident affecting a product traded by the company. This also includes a product recall or regulatory product safety non-conformity, including a regulatory enforcement notice.

Supplier and subcontractor reporting system: QDOC0013 Subcontractor Minimum requirements includes an emergency contact number for Just Ingredients in the case of any incidents.

Product recall and withdrawal procedure: PCD03 Recall procedure, business continuity planning and crisis management v10 dated 19 JUL 2023.

Details of the last test: Cinnamon Quills Batch DF3/169/1901. Completed on 21 AUG 2023. Received 36 x7kg in bulk. 34 x7kg sold on as bulk. 14kg stock packed into various smaller packs. All stock reconciled. Started 8:12am, Finished 10:05am.

Non Applicable Clauses

Clause/Section Ref	Justification

4. Supplier and Sub-contracted Service Management

Approval and performance monitoring of manufacturers/packers and traded products

A documented risk assessment has been completed of each product or material or group of product / materials, which considers the potential for various potential risks within the supply chain, such risks include.

Allergen contamination, temperature abuse, foreign-body, microbiological contamination, chemical contamination, variety or species cross-contamination, substitution or fraud and any risks associated with products or materials which are subject to legislative control.

Consideration is also given to the significance of the products and materials to the quality of the final product.

The risk assessment is updated when relevant changes occur and is reviewed at least every three years.

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The site operates an effective supplier approval and monitoring programme, all materials and products purchased or managed are sourced through approved suppliers list and monitored at regular intervals, suppliers of services are also risk assessed accordingly and approved, then entered onto the approved supplier system before they can be used.

The approval procedure is based on, or a combination of, certification to a valid GFSI benchmarked standard with a scope that includes the products or materials provided, supplier audits, or a completed supplier questionnaire that has been reviewed and verified.

Supplier performance is reviewed and where questionnaires are used, these are re-issued in accordance with the standard.

The sites system includes plans which form part of the supplier's product safety management systems and that any resultant actions are implemented.

The risk assessments form part of the supplier's product safety management systems.

Assessments are completed and the records include those controls or activities that have been implemented.

Process for initial approval and on-going review of the suppliers of products: PCD 01 Procedure for product and service supplier approval v7 dated 21JAN 2021. The site currently has only one product supplier Cotswold Heath Product who are A&B BRCGS certified, with information on identification of all approved manufacturing suppliers available to Just Ingredients. In addition, they have completed Supplier Minimum Requirements, Food Supplier Due Diligence Questionnaire and the Threat and Security Risk Assessment on 08 NOV 2022. On-going review due to sister company arrangement. The procedure includes criteria for approval in the event of an alternative product supplier being sourced.

Risk assessment details: Cotswolds Health Products have completed a TACCP001 Product Vulnerability Risk assessment for each raw material that includes origin, physical, chemical, and specific considerations e.g. Red rose petals from Pakistan at medium risk of pesticide contamination.

Suppliers reviewed:

- Supplier 1: The site only has one product supplier (sister company Cotswold Heath Products Ltd) who are certified Agents and Brokers (BRCGS Site Code: 1457004 expiry date: 13 OCT 2024). The identification of all manufacturers is detailed in a central supplier database shared by CHP and JI. ISO 22000 certified cert ref C0327819 expires 10 AUG 2025.

Frequency of ongoing approval of suppliers: Reviewed on an ongoing basis with any issues raised captured on the corrective action log and investigated.

Management of suppliers of services

A range of service suppliers are included in the supplier approval process and formal service agreements and/or contracts are in place for all service providers. There is also a process in place which ensures that service providers are regularly monitored and subjected to a formal and on-going review.

Reference was made during the assessment to the process map which was used to follow through each individual supply chain route in order to ensure that the system is robust.

Process for initial approval and on-going review of service providers: PCD 01 Procedure for product and service supplier approval v7 dated 21 JAN 2021. GFSI service providers are preferred. All service suppliers are required to complete QDOC0013 Subcontractor Minimum requirements, QDOC 0012 Threat and Security Risk Assessment and QDOC SUPP 001 Food Supplier Due Diligence Questionnaire as appropriate.

Details of the on-going review of suppliers and sub-contractors: The main service provider is David Hathaway Holdings Ltd for distribution. Vosipse storage is managed by CHP. An agreement is in place for the delivery of small packages to individual customers by Parcelhub. Performance is monitored on an on-going basis with review and investigation of any non-conformances arising. Formal review is included in the annual management review.

Systems implemented to ensure risks are identified and controls are in place: Controlled through checking on-going certification status, complaints monitoring and performance reviews. Service supplier QDOC 0012 Threat and Security Risk Assessment.

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Report No. 0673-A (2023)

Auditor: Paula Cross



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Product Security / Food Defence

The product security and food defence arrangements have been assessed to ensure the integrity of products through the supply chain.

Security arrangements of the service providers that handle the product are verified at the start of the contract and a risk assessed frequency, unless they are certificated to a relevant GFSI benchmarked Standard.

Security risk assessment: Threat Analysis v6 dated 07 NOV 2023. The site has risk assessed the potential threats within the supply chain, including supplier, transport and storage. Suppliers are also requested to complete QDOC 0012 Threat and Security Risk Assessment e.g. DH 21 SEP 2022.

Security controls in place: The main transport and storage of products is within the GFSI scope of approved service suppliers, with security measures in place to protect the product. QDOC 0013

Subcontractor Minimum Requirements also includes security arrangements and the responsibility of the service provider to maintain product security at all times.

Contracts and terms and conditions challenged:

- David Hathaway Holdings Ltd. QDOC0013 Subcontractor Minimum requirements Signed 21 SEP 2020. QDOC 0012 Threat and Security RA completed 21 SEP 2022.
- Vosipse Ltd (storage managed by Cotswold Health Product as they own product up to point of dispatch). QDOC0013 Subcontractor Minimum requirements Signed 20 SEP 2022. QDOC 0012 Threat and Security RA completed 20 SEP 2022.
- Parcelhub (small scale parcel delivery only). Packets and parcels agreement signed by both parties 19 AUG 2021. No historic issues.

Product inspection and laboratory testing

Where required by the customer, a scheduled programme of product testing which includes the methods, frequency and specified limits which are documented.

Test and inspection results are recorded and reviewed regularly to identify trends and the significance of external laboratory results is understood and acted upon accordingly.

The site ensures that the supplying site has a system of validation and ongoing verification of the shelf-life of its products.

Where required, pathogen testing is subcontracted to an external laboratory.

Subcontracted analysis, which is critical to product safety or legality, is conducted in an accredited laboratory when required under contract.

Procedures are in place to ensure reliability of laboratory results.

The significance of laboratory results are understood and acted upon accordingly with appropriate action undertaken promptly to address any unsatisfactory results or trends.

Product verification programme in place: Cotswold Health Product supply a CoA with all products from supplier information and company test results.

Just Ingredients Sampling and verification program in place, including frequency and tests completed: QDOC 014. Just Ingredients Risk Assessment Test Rationale v7 dated 03 FEB 2022.

Sample of test certificates seen:

Organic Turmeric BBE Dec 2025. Just Ingredients CoA Micro results based on Microsearch Lab Certificate No: 14465547/1. TVC at 30°C = 60 cfu/g, Enterobacteriaceae <10cfu/g, Yeasts <20cfu/g, Moulds = 60 cfu/g, *E. coli* <10cfu/g, *Salmonella* Not Detected.

Olive leaves. Microsearch Lab Certificate No: 14714874/1 dated 11 AUG 2023. *E. coli* <10 cfu/g, *Salmonella* Not Detected.

Campden BRI Alkaloids testing on Basil, Mint, Fennel Seed, Chamomile Flowers. Report No: 121856 dated 07 AUG 2023. All satisfactory.

Campden BRI Pesticide residue testing on Black Cardamon Pods, Black Sesame Seeds. Report No: 118524 dated 20 JUN 2023. None detected.

All microbiological testing is completed by Microsearch UKAS 1916 and Campden BRI for pesticides, alkaloids.

Just Ingredients is Organic certified by the soil association certified License number DA22764 expires 30

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JUN 2024 and Cotswold Health Product is also organic certified by the soil association certified License P1926 expires 30 SEP 2024.

Product Legality and Labelling

The systems in place have ensured that material or product labelling that takes place based on the customer's needs, complies with the legal requirements.

Those materials / products reviewed as part of the trace exercise were seen to meet legal requirements for the country of use and include details to ensure safe handling, storage, preparation and use, also a process to verify that labelling is accurate against the relevant specifications.

Verification of product legality: PCD06 Labelling procedure v4 dated 29 APR 2023. Technical generate the label information against labelling guidelines using information from product specifications. Additional information added as required. Text is also sent for translation, trading standards consulted if required. Labels are circulated for amendments with final approval by JKM who uploads onto the database with approved batch codes.

A new label printing system has been implemented in 2023 which provides a drop-down list of batch codes approved for label printing. This has reduced the incidence of incorrect batch code information on labels.

Product design and development

The site does not undertake any product design and development processes, therefore the requirements of this section of the Standard are not applicable.

Product release

The site does not undertake any product release, therefore the requirements of this section of the Standard are not applicable.

Product authenticity

A formal and documented system has been established which ensures that the risk associated with the procurement or provision of fraudulent or adulterated materials or products is minimised and ensures that all product descriptions and claims are legal, accurate and verified.

The site has undertaken a detailed and documented vulnerability assessment which has considered historical evidence, economic factors which may encourage fraud, ease of access to products and materials within the supply chain and the sophistication of testing relevant to the nature of materials or products.

A documented vulnerability assessment plan is in place, which is formally reviewed at least annually. Where materials or products are identified as being at particular risk of adulteration or substitution, the vulnerability assessment plan includes appropriate assurance and/or testing processes to mitigate the identified risks.

Processes to access information: The site use a number of websites including FSA alerts, RASFF, as well as industry connections to ensure it has access to historical and developing threats.

Details of vulnerability assessment: QMPOL 04 Vulnerability Policy Statement. Cotswolds Health Products have completed a TACCP001 Product Vulnerability Risk assessment v8 for each raw material which includes product fraud and potential substitution.

Last review of vulnerability assessment: 03 MAR 2023.

Products at risk of adulteration: No products identified as at High Risk of adulteration.

Management of surplus products

The site does not have any requirement to manage surplus product, therefore the requirements of this section of the Standard are not applicable.



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Non Applicable Clauses	
Clause/Section Ref	Justification
4.2.5	No service providers subcontract their services to other providers.
4.6	The company does not participate in any NPD processes currently.
4.7	Positive release of products is not undertaken or required by the client.
4.8.3	There are no products identified as being at risk of fraud or substitution.
4.9	The company does not have any issues or dealings with Surplus Products

5. Personnel

The site has ensured that all personnel working within the business that carry out technical or administration activities that affect material or product safety, legality and quality are demonstrably competent to carry out their activity through training, work experience or qualification. Systems are in place for training and monitoring of full time and temporary staff within the business. The site has a detailed training programme for staff on induction, specific operational training, including updates or refresher training.

Records of all training includes details of the name of the trainee, the date and duration of the training, course title, the trainer and for internal courses, a reference to the material, work instruction or procedure that is used in the training. The site routinely reviews the competencies of its staff.

Training programme details: QCPRC 06 Training Procedure v4 dated 08 NOV 2021. The site has a detailed training matrix which summarises the training required for each job role and the date completed for each employee. Includes CHP and JI employees and also Vosipse employees trained on CHP procedures. Individual training files contain further details of the training completed.

Competency Requirements: Assessed by any internal NCs, external NCs and annual staff appraisals. Training assessment questionnaire for food safety understanding and competence. E.g., Completed by JKM 08 Dec 2022 and signed off by KO.

Training records reviewed: SB – Senior Sales Advisor - trained in customer complaints, food safety, quality, HACCP, allergen and organic awareness.

JKM - Technical and Compliance Co-ordinator – trained in food safety, quality, HACCP, allergen and organic awareness, complaints procedure, internal auditing, label requirements and printing, FSA food allergen online training, HACCP Level 3.

Non Applicable Clauses	
Clause/Section Ref	Justification

6. Meeting FSMA Requirements

The site does not require the FSMA voluntary module, therefore the requirements of this section of the Standard are not applicable.

Non Applicable Clauses	
Clause/Section Ref	Justification

