

## Audit Report

### Global Standard for Packaging and Packaging Materials Issue 4 : February 2011

<b>Company Name:</b>	Euro Pool System International	<b>Site Name:</b>	Euro Pool System International
<b>Audit Category:</b>	High Hygiene Risk	<b>BRC Site Code:</b>	3535422

<b>Audit Result:</b>	CERTIFICATED	<b>Audit Grade:</b>	A
		<b>Audit Frequency:</b>	12 months

A or B = 12 months  
C = 6 months

<b>Audit Start Date:</b>	2014-01-27	<b>Audit Finish Date:</b>	2014-01-27
<b>Re-audit Due Date:</b>	2015-02-04	<b>Previous Audit Date:</b>	2013-01-22

<b>Auditor Number (one only: team leader)</b>	<b>Auditor Names</b>
104149	Gitta Hamers

#### Scope Details

**Packaging Field:**

04 - Plastics

**Scope of Audit:**

The development of returnable plastic crates intended for the direct and indirect storage of food and the intake, cleaning, storage and issue of these crates at the washing location in Belgium (Zellik).

**Exclusions from Scope:**

Washing of fish boxes and meat trays in location Zellik.

**Products in production at the time of the audit:**

Trays are Washed.

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### Company Profile

Euro Pool System is Europe's largest logistical service provider for returnable and reusable packaging. The organisation manages 160 mio. trays, rotating through the market over 700 mio. times a year. Euro Pool System develops, controls the production at several suppliers and stays the owner of the crates during their lifespan. After each rental cycle the crates are washed in one of the 45 washing stations, before a next rental cycle can start. The washing stations which are 'owned' by Euro Pool System are audited against the BRC S&D standard. Due to the fact that Euro Pool System is really controlling the production of crates at the moulding factories the BRC-IOP standard is used for auditing main office. Relevant information of the BRC S&D audit location Zellik is added to this report and vice versa. All 52 washing machines are owned and maintained by Euro Pool System. Head office is located in Rijswijk, the Netherlands. The company is owned by the three auctions at which the company was founded in 1992. The crates are either fixed, or have fold-able sides to reduce the transport volume when empty. There are ca. 400 employees in the group and ca. 40 employees at head office. In Zellik, Belgium a crate washing station is owned. This plant is 9 years old and measures 12000 m2. Work is done in 5 shifts. There are 5 washing lines: 3 for Euro Pool crates, and 2 for other crates (fish and meat, which are outside the scope of the certificate). The actual washing operation at Zellik is outsourced to a service provider, but the technical staff are working for Euro Pool System. During the audit head office in Rijswijk (BRC IOP) and the washing depot in Zellik were visited (BRC S&D). During the audit in Zellik fold able and fixed crates were washed. Euro Pool System also has an ISO9001 certificate.

### Detail of Non-Conformities

#### Summary of Non-Conformity Raised

	No.		No.
Critical non-conformity	0	Major non-conformity	0
Major against statement of intent of a Fundamental clause	0	Minor non-conformity	6

#### Critical

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

#### Major against SOI of a Fundamental Clause

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

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### Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by

### Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by
1	3.7	The company does have a system to control specifications. During the audit no deviations established regarding specification control. NC: No Safety sheets available for grease: "SKF Bearing Grease".	The SHEQ coordinator Zellik required the technical department to collect every MSDS. This instruction is also confirmed by email. The availability of the MSDS is a legal and SHEQ requirement.	Y	2014-02-28	Gitta Hamers
2	3.8	In general records are demonstrable and maintained. NC: Records of red crates in night shift 16-10-2013 where not filled in.	The shift leader found later during his controls of the registrations that the form was not filled in by the operator/technician. Technicians are cooperating operators with extra technical skills. It was decided since week 47 2013 that technicians are no longer working on this job location because of the required registrations. The technicians are now working on less critical job locations. There is no written decision. There has been no non-conformity found after that date, everything is filled in.	Y	2014-02-28	Gitta Hamers

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3	4.2.1	Condensation was seen on smoke shutters in ceiling which leaked on pallets.	We did a series of bacteriological tests - pathogens - on the collected condensation water that fell down from the smoke shutters. We did investigate if there was additional visual/physical pollution other than moist in the trays. This was not the case. We made a risk inventory taking the application of the trays for fruit & vegetables in consideration. There is direct contact with food but this is non critical food (DIN standard 10522). Bacteriological controls are not prescribed in this standard. However, Euro Pool System trays are yearly tested by Silliker laboratories to gain knowledge in this field and to control the washing process. Based on the results of the bacteriological testing we came to the conclusion that the condensation does not deliver any risk for public health. We received 1 complaint in 2013 about wet tray but this was about condensation in the foil around the trays. In case we should consider a topsheet for a production this would lead to a cost increase for the client. This is a dedicated depot for retailer Delhaize. No requirement was set for extra measures.	Y	2014-02-28	Gitta Hamers
4	4.7.1	Crate washer black crates was leaking at some site doors. Isolation material above crate washer was half loose. (Risk of falling on clean crates)	The door rubbers are purchased and replaced however not yet to our satisfaction. We continue looking for better quality door strips or an extra horizontal rim at the inside of the door.	Y	2014-02-28	Gitta Hamers

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No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by
5	4.12.12	Hygiene check is done sample wise. Not all vehicles are checked on hygiene.	A new list is set-up and requested at Cognos (reporting tool supplier) with all daily scheduled deliveries. (see test list) In this list a column is added with hygiene OK/NOT OK. Until we have this list +extra kolom we use half/manual/half digital solution (see orderlijst 17/2). As instructed in email. The workers will use later the e-touch screen at the dock to enter the OK or Not OK. The former 2 page checklist RF 0.2.037 will be replaced.	Y	2014-02-28	Gitta Hamers
6	5.8.1.4	On machine "dichtvouwen" cracked plexiglas was not detected.	The hood is replaced. See photo's, purchase order Verbeeck for a new hood and the working order for the replacement. The technicians are instructed to report also this type of breakage.	Y	2014-02-28	Gitta Hamers

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### Company Details

<b>Company Name:</b> Euro Pool System International	
<b>Site Name:</b> Euro Pool System International	
<b>Address:</b> Laan van Vredenoord 8	
<b>Country:</b> NEDERLAND	<b>Postcode:</b> 2289 DJ
<b>Telephone:</b> 070-3014141	<b>Fax:</b> 070-3014199
<b>Company Representative Name:</b> Mrs. V. van de Meer.	
<b>Email:</b> valentine.vandermeer@europoolsystem.com	

### Key Personnel

Name/Job Title	Present at Audit			
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
Mr. S. Seidler / Managing Director		x		
Mrs. V. van der Meer / SHEQ Manager	x	x	x	x
Mr. A. Plaisier / Supervisor Resource Planner	x		x	
Mr. A. van der Knaap / Project Manager Engineering and Development	x	x		
Mrs. L. de Zeeuw / HR manager	x	x		
Mrs. A. de Middelaer / SHEQ Coordinator Zellik		x		
Mr. D. de Buel / Warehouse outbound Zellik		x		
Mr. J. Janssen / Production manager Zellik		x		
Mr. D. Samaey / Site Manager Zellik		x		
Mr. B. de Pelsmaker / Warehouse incoming Zellik		x		
Mr. J de Cuyper / Employee Warehouse outbound Zellik		x		
Mr. D. van Sanden / Employee Warehouse incoming Zellik		x		

### Audit Duration Details

On-site audit duration 17 Man Hours
Duration of production facility audit 6 Man Hours
<b>Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration.</b> Audit in combination with BRC-S&D

### Audit Duration per Day

	Start time	Finish time
<b>Day 1</b>	09:15	17:15
<b>Day 2</b>	9:00	17:30

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Detailed Audit Report			
BRC Requirement No.	REQUIREMENT	Conforms	Details
		Y, N or N/A	

### 1. SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

#### 1.1 Product Safety and Quality Management System

SOI	The company's senior management shall develop and document a product safety and quality management policy, which is authorised, reviewed, signed and dated by an appropriate senior manager.	Y	The company policy regarding food safety, quality, legality and customer responsibility of 14-01-2014, is signed by CEO. This policy also includes commitment towards continuous improvement. The policy is communicated via newsletters, email etc.	
	1.1.1	Y	1.1.2	Y

#### 1.2 Senior Management Commitment FUNDAMENTAL

SOI	The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.	Y	The management of is very much involved in the introduction of the Standard. This is shown by the management review, which is done yearly and monthly, and the high degree of compliance with the requirements of the Standard.
1.2.1	The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.	Y	Clear objectives and targets are set for implementing SLA levels to better understand the level of service provided and differentiate different service levels (A++). Another objective is to reduce the amount of labels sticking to the washed crates. This is part of the 5 year strategic plan.
1.2.2	The company's senior management shall provide the human and financial resources required to implement the processes of the quality management system and product safety programme.	Y	Senior management provided sufficient resources for implementation of the management system for quality and food safety. Every site has a SHEQ Coordinator which are managed by the head of SHEQ.
1.2.3	Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.	Y	Clear communication structures are in place. Reporting and monitoring of compliance with the Standard take place through SHEQ meetings and management meetings.
1.2.4	The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative requirements in the country of manufacture and, where known, the country in which the packaging material will be sold. The company shall also be aware of any scientific and technical developments and industry codes of practice applicable.	Y	Euro Pool Systems remains aware of the relevant legal and scientific developments through membership of the Dutch packaging committee (N.V.C.). The SHEQ Manager is working as an advisor in NEN Commissions. The company is for example aware of plastic legislation EC 2011/10..
1.2.5	The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known.	Y	Products comply to European legislation, where products are sold. During the audit, based on the product trail, no deviations spotted.
1.2.6	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.	Y	NC's from the previous audit have been resolved adequately.
1.2.7	The company shall have a current, original copy of the Standard available on site.	Y	A current, original copy of the Standard was present.
1.2.8	Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due date indicated on the certificate.	Y	The recertification audit is carried out on time. (Before 04-02-2013)

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1.3 Organisational structure, responsibilities and management authority					
SOI	The company shall have a clear organisational structure and define the responsibilities, reporting relationships and job functions of those personnel whose activities affect product safety, legality, regulatory compliance and quality.			Y	The SHEQ manager is responsible for implementation of the Standard. She is reporting directly to the Director of Euro Pool Systems. Replacement in case of absence has been arranged. Responsibilities regarding food safety are recorded in job descriptions. The local SHEQ coordinators are replaced by the corporate SHEQ manager.
	1.3.1	Y	1.3.2	Y	
	1.3.3	Y	1.3.4	Y	
	1.3.5	Y			
1.4 Management Review					
SOI	The company's senior management shall ensure that a management review is undertaken to ensure that the product safety and quality programme is fully implemented, effective and that opportunities for improvement are identified			Y	The management review(s) (monthly and annual) of 2013 demonstrates that the senior management is in control of meeting the requirements of the standard. Continuous improvement targets are established like inventarising SLA levels. The actions are implemented within the agreed time-scale. Verified for project regarding SLA levels which is now in the fase of collecting information.
	1.4.1	Y	1.4.2	Y	
	1.4.3	Y	1.4.4	Y	
	1.4.5	Y			

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2. HAZARD AND RISK MANAGEMENT SYSTEM				
2.1 Hazard and risk management team				
SOI	A multidisciplinary hazard and risk management team shall be in place to develop and manage the hazard and risk analysis system and ensure this is fully implemented.		Y	The HACCP team exist of all SHEQ coordinators and lead by the corporate SHEQ manager. All SHEQ Coordinators have their own expertise like safety, food technologie, Health and safety, food safety. Team-leader is trained trough experience, and contribution to the NEN institute. When required, people with specific expertises are invited into the team (for example detergent experts of the detergent provider).
	2.1.1	Y	2.1.2	Y
	2.1.3	Y		
2.2 Hazard and Risk Analysis			FUNDAMENTAL	
SOI	A formal hazard and risk management system shall be in place to ensure that all hazards to product safety and integrity are identified and appropriate controls established.		Y	A HACCP system is implemented. (GOH 406, 14-01-2013) All hazards related to product safety and integrity have been identified. Effective control measures are introduced.
2.2.1	The scope of the hazard and risk analysis shall be clearly defined and shall cover all products and processes included within the intended scope of certification.		Y	The scope of the certificate matches with the scope of the hazard and risk analysis.
2.2.2	The hazard and risk analysis team shall maintain awareness of and take into account: historical and known hazards associated with specific processes, raw materials or end use of the product relevant codes of practice or recognised guidelines legislative requirements.		Y	The HACCP system is based on historically and known hazards, legal requirements and code of practices. Migration, cross contamination and microbiological contamination are addressed as hazards.
2.2.3	A full description of the product shall be developed, which includes all relevant information on product safety and integrity. As a guide this may include: composition, e.g. raw materials, inks, varnishes, coatings and other print chemicals origin of raw materials including use of recycled materials intended use of the packaging materials and defined restrictions on use; for instance, direct food contact, physical or chemical conditions.		Y	The product including intended use has been described in GOH 401 V3.
2.2.4	A process flow diagram shall be prepared for each product, product group or process. This shall include each process step from the receipt of raw materials to despatch to the customer. The process flow shall as a guide include, as relevant: <ul style="list-style-type: none"> <li>• receipt and approval of art work</li> <li>• receipt and preparation of raw materials such as additives, inks and adhesives</li> <li>• each manufacturing process step</li> <li>• the use of rework and post-consumer recycled materials</li> <li>• any sub-contracted operations</li> <li>• customer returns.</li> </ul> The accuracy of the process flow shall be verified by the hazard and risk analysis team.		Y	Seen flow diagram of supply chain containers (GOH 404) including cleaning, drying and keeping in stock of crates. Last revision of flow diagram is done on 22-02-2011.

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2.2.5	The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where relevant: <ul style="list-style-type: none"> <li>• microbiological</li> <li>• foreign objects</li> <li>• chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues)</li> <li>• potential problems arising from the use of recycled materials</li> <li>• legality</li> <li>• defects critical to consumer safety</li> <li>• hazards that may have an impact on the functional integrity and performance of the final product in use.</li> </ul>	Y	Significant hazards are: contamination with washing detergents, migration of plastics and cross contamination of dirty and clean crates. Verified hazard analyses for migration by migration tests and declarations of compliance during the product trail.
2.2.6	The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels. Where control is through a prerequisite programme these shall be reviewed to ensure they adequately control the risk identified and where necessary improvements implemented.	Y	The HACCP team has identified control measures to control hazards. Control measures to reduce the risk of reduce the risk of contamination with micro organisms are; wash installation cleaning and micro biological tests. A pre-requisite program is implemented.
2.2.7	For each hazard that requires control, other than by an existing prerequisite programme, the control points shall be reviewed to identify those that are critical. This process shall include an assessment of the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome. Critical control points shall be those control points that are required to prevent, eliminate or reduce a product safety or integrity hazard to acceptable levels. Where controls are not classified as critical and control may be achieved through a prerequisite programme, a programme shall be developed that is sufficiently specified to effectively control the identified hazards.	Y	Severity and probability goes from 0 to 3, which results in a risk matrix with scores from 1 to 5. Score 4-5 are CCP's. Scores 0 - 3 'control points'. No CCP's are established.
2.2.8	For each critical control point, the appropriate critical limits shall be defined in order to identify clearly if the process is in or out of control. Critical limits shall be measurable where possible and the rationale for their establishment clearly documented. Relevant legislation and codes of practice shall be taken into account when establishing the limits.	N/A	No CCP's are established.
2.2.9	For each critical control point a monitoring system shall be defined in order to ensure compliance with critical limits. Records of the monitoring shall be maintained. Procedures relating to the monitoring of critical controls shall be included in internal audits against the Standard (refer to clause 3.3).	N/A	No CCP's are established.
2.2.10	The corrective action that shall be taken when monitored results indicate a failure to meet the control limit shall be established and documented. This shall include the procedures for quarantining and evaluating potentially out of specification products to ensure they are not released until their safety can be established.	N/A	No CCP's are established.

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2.2.11	<p>A review of the hazard and risk management system shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of:</p> <ul style="list-style-type: none"> <li>• complaints</li> <li>• product failures</li> <li>• recalls</li> <li>• product withdrawals</li> <li>• results of internal audits of prerequisite programmes</li> <li>• results from external third-party auditors.</li> </ul>	Y	A periodical review of the HACCP studie is done.		
<b>2.3 Exemption of requirements based on risk analysis</b>					
SOI	The site has demonstrated adequate compliance with the requirements of this clause.	Y	Exemptions of the HACCP analyses are: 6.5.7. Hairnets are not worn in location Zellik, this is taken into account in the HACCP analyses.		
	2.3.1	Y	2.3.2	Y	

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3. PRODUCT SAFETY AND QUALITY MANAGEMENT SYSTEM					
<b>3.1 Product safety and quality manual</b>					
SOI	The company shall have a manual which describes how the requirements of the Standard are met. These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.	Y	A quality manual is available. This manual consists of the HACCP system and procedures. The manual is digital controlled. Documents are available for personnel on the intranet.		
	3.1.1	Y	3.1.2	Y	
<b>3.2 Customer focus and contract review</b>					
SOI	The company's senior management shall ensure that processes are in place to determine customer needs and expectations with regard to quality and safety and ensure these are fulfilled.	Y	De verkoopafdeling en customer service zijn verantwoordelijk voor het contact met de klanten. De klanttevredenheid word bepaald op basis van klanten klachten. Regular visits are paid to the accounts. Summaries of these visits and action points (observations, customer satisfaction, problems, complaints) are recorded in the weekly report. This gives the MT a close link to what happens with the customers.		
	3.2.1	Y	3.2.2	Y	
	3.2.3	Y			
<b>3.3 Internal audits</b>			<b>FUNDAMENTAL</b>		
SOI	The company shall audit those systems and procedures which cover the requirements of the Standard to ensure they are in place, appropriate and complied with.	Y	The company has implemented an internal audit program which covers all relevant aspects of the standard. During the audit it was established that the results of internal audits demonstrates compliance with the standard and/or adequate corrective actions are planned and taken.		
3.3.1	Internal audits shall be planned and their scope and frequency shall be established in relation to the risks associated with the activity. Audits shall be scheduled so that all aspects of the Standard are audited at least annually.	Y	Annual one internal audit is performed which covers the whole company. Internal audits cover all relevant aspects of the Standard. During the audit the internal audit of 15/11/2013 has been audited.		
3.3.2	Internal audits shall be carried out by appropriately trained competent personnel who shall be sufficiently independent from the department being audited to ensure impartiality.	Y	Internal auditors are independent and are trained. Seen certificate of SHEQ Coordinator in Zellik done in December 2011. (Internal auditor Safety, Environment and Quality)		
3.3.3	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period.	Y	Details of non-conformities are communicated to supervisory staff. Corrective actions are implemented.		
3.3.4	The completion of corrective action shall be recorded and verified.	Y	Corrective actions are maintained by the local SHEQ Coordinator on the action list following the internal audit report.		
3.3.5	Internal audit reports shall be sufficiently detailed to ensure that conformity as well as non-conformity can be clearly identified and verified.	Y	Internal audit reports are detailed and mention positive proof of conformity as well as non-conformities.		
<b>3.4 Supplier approval and performance monitoring</b>					
SOI	The company shall operate procedures for approval and monitoring of its suppliers. This shall include suppliers of materials and services to the company and ensure that materials and services procured conform to defined requirements.	Y	Suppliers are approved via a scorecard where suppliers are rated. Procedures for The design, purchase and review of containers (PO339) describes te purchasing process. Seen total overview of suppliers. The supplier of crates, and the development and design proces is managed and controled by Euro Pool System International. Materials are prescribed by Euro Pool System and only materials can be used of the "prescribed list". When new materials are to be used they are tested by Euro Pool Systems, the injection molder trough an external lab.		
	3.4.1	Y	3.4.2	Y	
	3.4.3	Y	3.4.4	Y	

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3.5 Subcontracting of production					
SOI	Where production processes are subcontracted this shall be with the agreement of customers. Procedures shall be in place for the effective control of subcontractors and the work undertaken.			N/A	No Subcontracted services for Europool Systems Head office. See also chapter 3.4 supplier approval and performance monitoring and chapter 5.1. product design and development.
	3.5.1	N/A	3.5.2	N/A	
	3.5.3	N/A	3.5.4	N/A	
3.6 Documentation control					
SOI	The company's senior management shall ensure that documented procedures and recording forms critical to the management of product safety, legality and quality are in place and effectively controlled.			Y	Relevant documentation is accessible for employees by Intranet. Documentation is sufficiently detailed to support operations like the disturbance form (28-01-14) and the checklist team leader. Interviews with team leader crate washing and employee incoming goods demonstrated knowledge of relevant procedures. No deviations established during the audit regarding authorisation and version control of documents.
	3.6.1	Y	3.6.2	Y	
	3.6.3	Y			
3.7 Specifications			FUNDAMENTAL		
SOI	The company shall ensure that appropriate specifications exist for raw materials, intermediate and finished products, and any product or service which could affect the integrity of the finished product and customer requirements.			N	The company does have a system to control specifications. During the audit no deviations established regarding specification control. NC: No Safety sheets available for grease: "SKF Bearing Grease".
3.7.1	Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant product safety and legislative requirements.			Y	Specifications of the crates are in place of as well as relevant services such as cleaning and disinfection chemicals and lubricants. Specifications of crate 18604 are assessed and found appropriate. Specifications of packing materials do include declaration of compliance and is conform standard and legal requirements.
3.7.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.			Y	Specifications are formally agreed and communicated with customers.
3.7.3	<p>A declaration of compliance shall be maintained, which enables users of the packaging materials to ensure compatibility with the product with which the materials may be in contact.</p> <p>The declaration of compliance shall contain as a minimum:</p> <ul style="list-style-type: none"> <li>the nature of the materials used in the manufacture of the packaging</li> <li>confirmation that materials meet relevant legal requirements</li> <li>the inclusion of any post-consumer recycled materials</li> <li>this shall identify any limitations of use of the declaration of compliance.</li> </ul> <p>Products shall meet at least minimum legal requirements in the country of manufacture and use, where known.</p>			Y	Seen declaration of compliance for crate 18604. This declaration is conform legal requirements EC 2011/10 and 1935/2004. Migration analyses are performed (march 2012) and comply to legal requirements and intended use.
3.7.4	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.			N/A	No trademarks
3.7.5	The company shall operate a specification review procedure.			Y	Specifications are regularly reviewed.

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3.8 Record Keeping					
SOI	The company shall maintain records to demonstrate the effective control of product safety, legality and quality.			N	In general records are demonstrable and maintained. NC: Records of red crates in night shift 16-10-2013 where not filled in.
	3.8.1	Y	3.8.2	Y	
	3.8.3	Y	3.8.4	Y	
3.9 Traceability			FUNDAMENTAL		
SOI	The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to distribution of the finished product to the customer. Records shall be retrievable in a timely manner.			Y	The company has implemented a traceability system.
3.9.1	The company shall have a system that has the ability to trace and follow all raw materials from the supplier through all stages of processing to distribution of the finished product and vice versa. Where continuous processes are used or raw materials are in bulk, the traceability of silos shall be achieved to the best practical level of accuracy.			Y	A system is in place for traceability. The crates of the traceability test are traceable through RFID Tags and EAN coding. When returned the crates are automatically detected on the conveyor belt. All crates have type number, a unique identification number and a EAN code. The new fold-able crates have RFID tags. Mould numbers and the name of the supplier are also readable on the crates.
3.9.2	An appropriate system shall be in place to ensure the customer can identify a product or production lot number for the product, for the purposes of traceability.			Y	Each crate can be identified by an unique crate code as well as mould number and supplier name. Next to that the newest crates have RFID tags.
3.9.3	The system shall be tested to ensure traceability can be determined from raw material to the finished product and vice versa. This shall take place on a predetermined frequency, at least on an annual basis, and results retained for inspection.			Y	12-07-2013 a real complaint led to a traceability test. Glass was found in crates of a customers. This batch was traced to a few customers and 2 other washing stations. All crates could be traced well. One point of improvement was found to create one person to communicate towards customers.
3.10 Complaint handling					
SOI	The company shall have a system for the effective capture, recording and management of product complaints.			Y	All complaints are recorded in a digital system. (Intranet/Sharepoint) All complaints are investigated. Seen handling and investigation of complaint regarding staples in crates. (Used by customers to attach information). Typical complaints are 'dirty crates' and sticker pollution. Structural actions are taken to reduce these type of complaints. Reduce the amount of sticky labels still on clean crates is part of the strategic plan over next 5 years.
	3.10.1	Y	3.10.2	Y	
	3.10.3	Y			
3.11 Management of incidents, product withdrawals and recalls					
SOI	The company shall have a plan and systems in place to effectively manage incidents, product withdrawals and recalls, in order to ensure that all potential risks to the quality, hygiene and legality of products are controlled.			Y	The procedure for incidents and recall meets the requirements of the Standard. (PRO337) An up to date list of key contacts is available in the form of a email list. A clear definition of an incident and emergency situation is documented and communicated to relevant staff. Recall and Withdrawal procedures are tested annual. Since the last audit one recalls was conducted (12-07-2013) following 2 glass complaints on this day. All crates could be traced to 2 washing stations and customers. Point of improvement was to use one communication line towards customers.
	3.11.1	Y	3.11.2	Y	
	3.11.3	Y	3.11.4	Y	
	3.11.5	Y	3.11.6	Y	

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4. SITE STANDARDS					
<b>4.1 External standards</b>					
SOI	All grounds within the site shall be finished and maintained to an appropriate standard.			Y	Site is suitable for the washing of crates, in good repair and well maintained. No risks from local activities. External areas are well maintained and external traffic routes are paved and in good condition. There is no outside storage. The outside walls are unobstructed. Greens are well kept and leave outside walls free.
	4.1.1	Y	4.1.2	Y	
	4.1.3	Y	4.1.4	Y	
	4.1.5	Y	4.1.6	N/A	
	4.1.7	N/A			
<b>4.2 Building fabric and interiors</b>					
SOI	The internal site, buildings and facilities shall be suitable for the intended purpose and shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.			Y	The building is suitable for the intended purpose. Walls, floors, ceilings and pipe work drains and windows are clean and sound. Sufficient lighting is provided. Drains are protected against entry of pests. No problems with dust/ condensation spotted.
	4.2.1	N	4.2.2	Y	
	4.2.3	Y	4.2.4	Y	
	4.2.5	Y	4.2.6	Y	
	4.2.7	Y			
<b>4.3 Utilities</b>					
SOI	All utilities to and within the production and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.			Y	No non-conformities were noted with respect to utilities. Water and air are monitored and controlled. Water used for the initial washing step is rain water. The rinsing is done with drinking water. Compressed air does not come in contact with the crates. Clean crates are monitored on microbiological growth. In this way the washing performance is monitored, but indirectly as well the water quality.
	4.3.1	Y	4.3.2	Y	
<b>4.4 Security</b>					
SOI	Security arrangements shall be assessed to ensure the integrity of products and processes.			Y	Access to the site is regulated by closed doors and electronic entrance. Visitors can only enter when an employee opens the door. During the audit all outside doors were closed. Visitors and contractors are included in the access policy. The security procedure is trained. The sites IT system is backed-up.
	4.4.1	Y	4.4.2	Y	
	4.4.3	Y	4.4.4	Y	
	4.4.5	Y	4.4.6	Y	
	4.4.7	Y			
<b>4.5 Layout and Product Flow</b>					
SOI	Premises and plant shall be logically designed, constructed and maintained. Procedures shall be in place to control the risk of product contamination and to comply with all relevant legislation.			Y	The construction of the building is logical and flow of products is such that contamination of product is prevented. Storage of dirty incoming crates are sufficiently segregated from the washing process and the clean crate warehouse. Storage of dirty crates to the washing to the storage of clean crates is a linear process. Clean crates are divided from dirty crates by walls. All crates are identified by EAN codes and unique product numbers. Working space is sufficient.

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	4.5.1	Y	4.5.2	Y	
	4.5.3	Y	4.5.4	Y	
<b>4.6 Equipment</b>					
SOI	Equipment shall be suitably designed for the intended purpose and shall be maintained and used so as to minimise the risk to product safety, legality and quality.			Y	Equipment is suitably designed and maintained. (See chapter 4.7). All washing machines at all depots are owned and maintained by Euro Pool System. New installations are specified before purchase and testing procedures are carried out.
	4.6.1	Y	4.6.2	Y	
	4.6.3	Y			
<b>4.7 Maintenance</b>					
SOI	A documented system of planned maintenance shall be in place, covering all items of equipment and plant that are critical to product safety, legality and quality.			Y	Maintenance and inspections of relevant equipment are planned and recorded. Euro Pool Systems has their own Maintenance Engineers who maintain all sites. Maintenance is planned weekly in agreement with the local technicians. New equipment is added to the maintenance plan. No temporary repairs seen during the audit. After maintenance contamination is prevented by inspection and release. Seen records of clearance 27-01-2014 and 17-09-2013. No wooden equipment detected during the audit. Engineering workshops are well maintained by cleaning.
	4.7.1	N	4.7.2	Y	
	4.7.3	Y	4.7.4	Y	
	4.7.5	Y	4.7.6	Y	
	4.7.7	Y	4.7.8	Y	
	4.7.9	Y			
<b>4.8 Staff Facilities</b>					
SOI	Staff facilities shall be sufficient to accommodate the required number of personnel, and designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.			Y	Staff facilities are gender specific where required and able to accommodate all personnel and visitors. They are suitable for their purpose and adequately maintained. All inspected hand washing facilities meet the requirements of the standard. Hot water and soap are available at all washing stations. Advisory signs for washing hands are placed in toilets. Smoking is not allowed in the building. Toilets are segregated adequately from production area's and warehouses. Food brought by staff is separately stored and is not allowed into production or storage areas.
	4.8.1	Y	4.8.2	Y	
	4.8.3	Y	4.8.4	Y	
	4.8.5	Y	4.8.6	Y	
	4.8.7	Y	4.8.8	Y	
	4.8.9	Y			
<b>4.9 Housekeeping and Cleaning</b>			<b>FUNDAMENTAL</b>		
SOI	Housekeeping and cleaning systems shall be in place, which ensure that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised.			Y	During the audit housekeeping and cleaning systems are in place. The general housekeeping and cleaning standards were achieved during the audit regarding buildings, equipment and cleaning equipment.

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4.9.1	Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.	Y	The inside and outside of the building are in a clean state. Based on interviews, cleaning procedures and observations, a clean as you go policy is implemented. Seen results of inspection of production leader which is performed once every 2 weeks. Monthly the SHEQ manager has an inspection. Seen results of inspection of wk 40-42 and Week 3-4. In both inspections all points where marked. In wk 40-42 a point of improvement was the hygiene in one toilet.	
4.9.2	All internal surfaces of buildings, equipment and vehicles shall be subject to documented scheduled cleaning. Cleaning schedules shall include the following information: <ul style="list-style-type: none"> <li>responsibility for cleaning</li> <li>item/area to be cleaned</li> <li>frequency of cleaning</li> <li>method of cleaning</li> <li>cleaning materials to be used</li> <li>cleaning record and responsibility for verification.</li> </ul>	Y	The cleaning procedure is documented in cleaning plans and conform requirements.	
4.9.3	Cleaning equipment and materials shall be kept in a secure designated location such as a locked cupboard.	Y	Cleaning equipment is stored when not in use in dedicated locations.	
4.9.4	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions.	Y	Cleaning chemicals are suitable for their uses.	
4.9.5	Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used.	Y	Strongly scented chemicals are not used.	
4.9.6	Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.	Y	Materials for cleaning toilets are stored separately.	
<b>4.10 Waste and waste disposal</b>				
SOI	Suitable facilities shall be provided for the storage and disposal of process and other waste.	Y	The food waste, coming from the dirty crates, is gathered in a press container as is the case for other waste (like washed off labels, wrap foil of pallets etc). Waste is removed in accordance with local law.	
	4.10.1	Y	4.10.2	Y
	4.10.3	N/A	4.10.4	N/A
	4.10.5	Y		
<b>4.11 Pest control</b>				
SOI	The company shall be responsible for minimising the risk of pest infestation on the site.	Y	A preventive pest control programme is in place. Pest control is operated by an external pest controller. (Rentokil) Pest inspection is carried out 8 per year. The pest program includes control of rodents and insects. The inspection reflects all activities of the site. Corrective actions were taken like keeping doors closed. Recommendations on prevention / hygiene aspects are carried out in a timely manner. The pest control program is documented digital and contains all elements of the standard. Last inspection is carried out on 27-01-2014.	
	4.11.1	Y	4.11.2	Y
	4.11.3	Y	4.11.4	Y
	4.11.5	Y	4.11.6	Y
<b>4.12 Transport, storage and distribution</b>				
SOI	The transport, storage and distribution of raw materials and finished products shall be undertaken in a manner to minimise the risk of contamination or malicious intervention.	Y	Trailers are checked for hygiene aspects based for cleanliness, mixed loads, damage and driver rules. There is no storage off-site or outside. There are no company owned vehicles. Agreements with third-party transport companies are in place. Seen contract including hygiene aspects of 06-03-2103. There is no storage outside of off site. Incoming goods, with dirty crates are separated from the clean crates by the washing department. This is a separate area between dispatch and incoming goods.	

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	4.12.1	N/A	4.12.2	Y	
	4.12.3	Y	4.12.4	Y	
	4.12.5	N/A	4.12.6	Y	
	4.12.7	Y	4.12.8	N/A	
	4.12.9	Y	4.12.10	N/A	
	4.12.11	N/A	4.12.12	N	
	4.12.13	Y			

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5. PRODUCT DESIGN AND PROCESS CONTROL					
5.1 Product design and development					
SOI	Product design and development processes shall be in place to ensure the production of safe and legal products to defined quality parameters.			Y	A procedure for product development is documented (PRO 339 'the design, purchase and review of containers') and operational. Crates are bought from an external injection molder. Development is done by Euro Pool System International. Euro Pool International controls the production and product development of new crates. Application is verified on the recently developed product crate 18604. Product specifications are present. Seen specifications of crate 18604; specific criteria are mentioned such as dimensions, top-load and maximal weight to carry. Samples are accepted through internal approval. (Validated based on requirements program). All materials injection molders use have to be listed on the released materials list. When new materials / suppliers are planned they first have to be tested / approved. (WOMB-test, effect of light and rain; migration reports and food approval documents.) Seen release test of crate 18604 done by the external testing agency.
	5.1.1	Y	5.1.2	Y	
	5.1.3	Y	5.1.4	Y	
	5.1.5	Y	5.1.6	Y	
5.2 Packaging print control					
SOI	Where packaging is printed with allergen/safety/legal information, procedures shall be in place to ensure that the information is fully legible and correctly printed to the customer's specification.			N/A	No packaging print.
	5.2.1	N/A	5.2.2	N/A	
	5.2.3	N/A	5.2.4	N/A	
	5.2.5	N/A	5.2.6	N/A	
	5.2.7	N/A	5.2.8	N/A	
	5.2.9	N/A	5.2.10	N/A	
5.3 Process control			FUNDAMENTAL		
SOI	Procedures shall be in place to ensure effective quality assurance of operations throughout the process.			Y	During the audit it was found that the company has an adequate quality assurance system operation for all processes within the company. This is for the production of crates outsourced towards the producer (see purchase). Process control mentioned here is partly based on crate rinsing location Zellik (BRC S&D audit).
5.3.1	The company shall undertake a review of the manufacturing and, where applicable, printing process to identify critical manufacturing process control points that could affect the quality of the products produced.			Y	Critical process control points, for example temperature, amount of detergent and pressure, of the washing are defined, validated and monitored against defined limits.
5.3.2	For each critical manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.			Y	The process specification is registered in the machine's control systems.
5.3.3	Documented process checks shall be undertaken at start up, following adjustments to equipment, and periodically during production, to ensure products are consistently produced to the agreed quality specification.			Y	Process monitoring checks conducted include temperature, amount of detergent and availability of RFID tag and EAN codes. Seen records (Of availability RFID / EAN) filled in during the audit and records of 1-10-2013 and 15-10-2013, both filled in properly. The crates with missing RFID / EAN are sorted out automatically. The system is tested every hour with red test crates to validate the process. Measuring devices for detergent concentration and temperatures are checked quarterly by the detergent provider.

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5.3.4	A clearance procedure shall be in place to ensure that at start up, the line is clear of all previous work and production documents.	Y	A clearance procedure is available for start-up.
5.3.5	Suppliers of incoming materials, as appropriate, shall provide evidence of conformity.	Y	Seen conformity evidence supplier of crate number 18604.
5.3.6	Quality checks shall be carried out to demonstrate that the finished product is within the tolerances laid down in the agreed product specification and conforms to any critical technical/legal requirements.	Y	Quality checks are conducted. During the washing processes operators verify visually regularly if washed crates are cleaned properly. Also a microbiological monitoring is done. Tests for Legionella contamination are conducted 4times a year. (Twice in warm and twice in cold season)
5.3.7	In the event of changes to product composition, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality are achieved.	Y	When changes are made to machines, the washing result is validated by repeated microbiological tests. The moulding of crates is a process which is pre-described by Euro Pool System.

### 5.4 Product inspection and analysis

SOI	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.	Y	Several checks are performed during the production process, migration tests are performed on new crate generations. Microbiological monitoring is done on clean crates. Inline RFID tag and EAN codes are tested. Records of these controls are kept and conform requirements. Seen test results for rejection of RFID/EAN-scanner. (28-01-2014 and 1-10-2013)	
	5.4.1	Y	5.4.2	Y
	5.4.3	Y	5.4.4	Y
	5.4.5	Y		

### 5.5 In-line testing and measuring equipment

SOI	The company shall use hazard and risk analysis principles to determine the need for in-line product testing equipment to ensure the integrity and quality of products.	Y	In-line measurement is used for pressures, temperatures and detergent concentration takes place in order to guarantee product integrity and quality. Calibration and maintenance of this measuring equipment is outsourced to the detergent supplier. Seen reports of Q3 + Q4 2013. The machine setting is such that it automatically stops when certain limits are exceeded for a defined period of time. The fold-able crates are tested in-line to test if the folding still works. When the system is broken te crate is repaired or replaced.	
	5.5.1	Y	5.5.2	Y
	5.5.3	Y	5.5.4	Y

### 5.6 Calibration

SOI	Measuring equipment used to monitor critical manufacturing process points and product safety and legality shall be calibrated.	Y	Calibration of measuring equipment is in place. Seen results of calibration of the washing machine which is done by the detergent company. (Q3 and 4 2013) During the audit no deviations established regarding uncontrolled un-adjustment and/or damage of measuring equipment.	
	5.6.1	Y	5.6.2	Y
	5.6.3	Y	5.6.4	Y
	5.6.5	Y		

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5.7 Control of non-conforming product					
SOI	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.			Y	A procedure for identification and isolation of non-conforming products is established. Decisions with regard to corrective actions and product release are taken by the depot manager and the SHEQ coordinator. Damaged crates are sorted out and destructed (externally).
	5.7.1	Y	5.7.2	Y	
	5.7.3	Y			
5.8 Foreign body contamination control					
SOI	All practicable steps shall be taken to identify, avoid, eliminate or minimise the risk of foreign body contamination.			Y	The good general hygiene and the well planned cleaning and inspection systems do eliminate / minimise the risk of foreign body contamination. A risk assessment regarding foreign bodies has been carried out. Partly based on the prerequisite program like cleaning contamination with foreign bodies is controlled. Also procedures like sharps-control and glass policy are in place. Sharp blades are controlled. No deviations established during the audit.
5.8.1 Foreign body control					
	5.8.1.1	Y	5.8.1.2	Y	
	5.8.1.3	Y	5.8.1.4	N	
	5.8.1.5	Y			
5.8.2 Sharps control					
	5.8.2.1	Y	5.8.2.2	Y	
	5.8.2.3	Y	5.8.2.4	Y	
	5.8.2.5				
5.8.3 Chemical control					
SOI	Controls shall be in place to prevent contamination from chemical or biological hazards.			Y	The facilities for the storage of chemicals are adequate. Chemicals are fit for the intended use. Detergent concentration during washing is in-line tested. A too high level resulting in remaining chemicals can be excluded this way. Also microbiological swabs are periodically taken. Seen results of May 2013.
	5.8.3.1	Y	5.8.3.2	Y	
6. PERSONNEL					
6.1 Training and competence			FUNDAMENTAL		
SOI	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.			Y	
6.1.1	All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.			Y	Euro Pool System has demonstrated that personnel is properly trained, instructed and evaluated. New employees have to sign for understanding the hygiene rules. These are repeated annually. Seen for last new employee, signed on 25-01-2014. The instructions are available in the Dutch and French language.

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6.1.2	The company shall routinely review the competencies of staff and provide relevant training as appropriate. This shall cover all packaging quality assurance, potential contamination and safety hazards, including those specific to established critical process steps.	Y	Competences are yearly reviewed in a job review meeting. Personnel is evaluated on a few aspects like commercial insight, reasoning and behaviour. Job related features have to be filled in per employee and differ in different job roles. At this moment the appraisal system is being improved. Till now every employee scores 3 or 4 (out of 5). The company wants to get more realistic scoring of competences. Seen evaluation of the product developer over 2012.	
6.1.3	Records of training shall be kept for all current and recent key employees.	Y	The training provided is recorded per individual. Seen training records of internal auditor, new employee and product developer.	
6.1.4	A programme of refresher training shall be in place.	Y	A refresher training is implemented and held annual.	
6.1.5	The company shall document training procedures and records to demonstrate that training is effective and regularly reviewed.	Y	Training results are reviewed on effectiveness and discussed with trained employee and manager.	
<b>6.2 Access and movement of personnel</b>				
SOI	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise product safety and quality.	Y	Seen map of the site. Access in and out of the site is controlled by closing external doors and electronically access. Walking ways in the factory are logical.	
	6.2.1	Y	6.2.2	Y
	6.2.3	Y		
<b>6.3 Personal hygiene</b>				
SOI	The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.	Y	The company personal hygiene rules are documented and are adequate and conform requirements. The rules include jewellery, watches, hand washing, medicines, personal mobile phones, eating, drinking and smoking procedures. Instructions for hand washing are in place in toilets and next to entrances to production facility. During the interviews it has been established that hygiene rules are followed and known by all personnel.	
	6.3.1	Y	6.3.2	Y
	6.3.3	Y	6.3.4	Y
	6.3.5	Y	6.3.6	Y
	6.3.7	Y	6.3.8	Y
	6.3.9	Y		
<b>6.4 Medical Screening</b>				
SOI	Health conditions likely to adversely affect product safety shall be monitored and controlled.	Y	Employees are instructed to report contagious disease. Visitors are being asked to fill in a health questionnaire. The plasters in use are detectable with the metal detector and have a notable colour.	
	6.4.1	Y	6.4.2	Y
	6.4.3	Y		

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6.5 Protective clothing						
SOI	Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.			Y	The company provides suitable protective clothing for personnel and visitors. Every employee does receive suitable company clothing. The clothing is conform the requirements of the Standard. Visitors does receive a bright coloured jacket. Self-care laundering is permitted and instruction is provided. Hairnets are not provided. No complaints on hair in crates received and chance is very small that hair enters a crate due to distance employee to washing line.	
	6.5.1	Y	6.5.2		Y	
	6.5.3	Y	6.5.4	Y		
	6.5.5	Y	6.5.6	Y		
	6.5.7	Y	6.5.8	Y		
	6.5.9	Y	6.5.10	Y		
	6.5.11	Y				

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