

Audit Report

Global Standard for Storage and Distribution Issue 4: May 2021

1. Audit Summary			
Company name	P.J. Leegwater B.V.	Site Code	1337991
Site name	P.J. Leegwater B.V.		
Scope of audit	Transport and wholesale of fruits and vegetables with storage, order picking and distribution from the Maasland warehouse.		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Start Date	2026-01-08	Audit Finish Date	2026-01-09
Re-audit due date	2027-03-16	Audit result	CERTIFICATED
Certificate issue date	2026-02-23	Certificate expiry date	2027-04-27
2. Audit Results			
Audit grade	AA+	Audit Programme	Unannounced option 1
Previous audit grade	AA	Previous audit date	2025-03-11
Number of non-conformities	Critical		0
	Major		0
	Minor		1

Additional modules included		
Modules	Scope	Exclusions from Scope
10 Wholesale Module	The wholesale of fruits and vegetables	None
10.2 Branded Products	The wholesale of fruits and vegetables	None
10.3 Other wholesale operations	The wholesale of fruits and vegetables	None

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Report No. NL/VOE/244981

Auditor: Sue Mudde



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Choose a module		
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3. Product Characteristics	
Product categories	Activities
01 - Chilled and Frozen Food Select a product category Select a product category Select a product category Select a product category	01 - Storage 02 - Distribution 04 - Wholesale Module Select an activity Select an activity

4. Company Details			
Address	De Mossel 21 1723 HZ Noord-Scharwoude		
Country	The Netherlands	Site Telephone Number	0031 226362200
Commercial representative Name	Mr. B. Leegwater	Email	bart@paulleegwater.com
Technical representative Name	Mr. P. Bruin	Email	perry@paulleegwater.com

Additional Locations		
Site Name	Address	Activities
P.J. Leegwater B.V.	Herenwerf 18, 3155 DK Maasland, The Netherlands	Storage, orderpick

5. Company Profile					
Plant/Warehouse size (sq. m)	<10K sq.m	No. of employees	1-50	No. of Vehicles	10-25

5. Company Profile

Subcontracted processes	Yes	Regions exported to	Europe Choose an item. Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
Other certificates held	Organic (Skal)		
Major changes since last BRCGS audit	None		

Company Description

P.J. Leegwater B.V. is a fruit and vegetable wholesaler with office in Noord-Scharwoude – Netherlands and a small warehouse in Maasland – Netherlands. The organisation is established in 1938. Most products handled are Dutch field-grown vegetables, e.g. cabbages, lettuce, onions and carrots, Dutch greenhouse vegetables (bell peppers, cucumbers) and fruits (a.o. strawberries). Incidental exotic products are traded (avocado). Products are sold to wholesalers, processors, markets and retailers within Europe.

There are 20 persons working in the organisation. Warehouse staff includes 3 company hired people and 4 fixed agency people. There are 5 drivers. 9 persons work in the office (sales, sourcing, administration, etc.) The company owns 12 trailers and 5 trucks. The size of the warehouse is 2500 m2. The company is also certificated by SKAL for Organic products. Una 1:3 was conducted on 8 and 9 January 2026.

6. Audit Duration Details

Total audit duration	16 man hours	Site & vehicles audit duration	6 man hours
Reasons for deviation from typical or expected audit duration	No deviation from the approved duration.		
Next audit type selected	Unannounced		

Audit Duration per day

Audit Date	Start Time	Finish time
2026-01-08	08:15	16:45
2026-01-09	08:00	16:30

	Auditor Number	Name	Role
Auditor Number	42829	Sue Mudde	Lead Auditor
Second Auditor Number	Click or tap here to enter text.		Please select

Key Personnel					
Name	Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mr. B. Leegwater	Director	Onsite		Onsite	Onsite
Mr. P. Bruin	QA manager	Onsite		Onsite	Onsite
Mr. R. Weinmann	Warehouse manager	Onsite	Onsite)	Onsite	

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced
2023-01-17	BRCGS S&D Issue 4	Unannounced
2024-03-13	BRCGS S&D Issue 4	Announced
2025-03-11	BRCGS S&D Issue 4	Announced

Document control			
CB Report number	NI/VOE/244981		
Template Name	SD406 Storage & Distribution Audit Report Template v3		
Standard Issue	4	Template issue date	2022-02-15
Directory allocation	S&D	Version	1.1

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	7.4.1	Window (plastic) in technical area was damaged (separate room from warehouse)	This issue occurred, but it was immediately resolved by covering the damaged	Periodic inspections will be introduced to identify damage at an early stage.	The root cause was the lack of a formal	2026-01-21	Sue Mudde

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Minor							
			plastic window with ultrastrong tape.	Damaged windows will be repaired or replaced promptly, and employees will be instructed to report any damage immediately to prevent recurrence.	infrastructure check within the production inspection. This has now been addressed by adding plastic windows and partitions to the routine production inspection checklist.		

Comments on non-conformities

Click or tap here to enter text.

Head Office Non-Conformity Summary

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Detailed Report

1. Senior Management Commitment

A documented policy is in place that states the company's intention to meet its obligations to store and distribute safe, legal, and authentic products according to specified quality requirements and its responsibility to its customers. The policy, PR-01.01.01, is dated 26-11-2021 and was signed by B. Leegwater, Director, on 03-03-2022. The policy is communicated by displaying it in the offices. During the audit, it was confirmed that the quality policy is well implemented and understood by the personnel.

The site's senior management has defined and maintained a clear plan for the development and ongoing improvement of a food safety and quality culture. This is documented in RF-05.08.13, dated 29-02-2024, and reviewed on 19-02-2025. The improvement plan focuses on management behaviour, knowledge of food safety, work culture, staff behaviour, day-to-day production, communication, problem management, and the involvement of authorities. The plan is reviewed annually with management, and training is performed as part of the process.

The management team has set clear objectives, which are documented in the management review dated 19-02-2025. Meetings are held monthly to verify the status of these objectives. Objectives for 2024 were all accomplished, including continuation of BRCGS S&D certification, hiring one new commercial employee, enhancing company culture, introducing new articles, and continuing credit insurance. Objectives for 2025 include customer satisfaction, reenforce client relations network by being more visible in food market organizations and trade fairs, and improving the financial policy with more reliable software system reports. These objectives are reviewed in monthly HACCP meetings as seen for: 15-12-2025, 17-11-2025, 15-9-2025, 11-8-2025, 16-6-2025, 14-4-2025 and 13-1-2025.

The Management Review meeting was held on 19-02-2025. All mandatory subjects, including audits, complaints, supplier management, and pest management, were sufficiently covered. There were no actions from the previous (06-03-2024) management review, and all objectives were verified. No food safety or legal complaints were received. The company had 5 recalls and no withdrawals since the previous BRCGS audit. This were the following (and notified to NVWA and SGS within 3 days):

- Pineapple 6-6-2025, batch 02042210 + 1101721, 220% MRL no aRfD Chlorpyrifos-ethyl (Normec) (no official recall)
- Passion fruit 11-11-2025, 0,057mg/kg Flonicamid and 0,021 mg/kg Fluopicolide MRL no aRfD (no official recall)
- Raspberries 13-11-2025, 0,63mg/kg 6300% MRL no aRfD Bifenazate (no official recall)
- Frisee salat 18-11-2025, 0,12 mg/kg 1200% MRL no aRfD Deltamethrin (no official recall)
- Shanghai paksoi 7-11-2025, batch NL856616837B01, 0,4mg/kg 257% aRfD lambda-Cyhalothrin

The effectiveness of the HACCP, Food Defence, and Authenticity systems was evaluated, and resource requirements were assessed both ongoing and annually during the management review.

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A program for meetings is in place, including monthly HACCP team meetings and bi-annual meetings with warehouse staff. In these meetings, food safety, legality, integrity, and quality issues are brought to the attention of senior management.

The company has set up a confidential reporting system that enables staff to report concerns regarding product safety, integrity, quality, and legality. The system, documented in PR-05.08.12, dated 01-02-2022, works by having a trusted person receive the report and discuss it anonymously with management. The system is communicated to all staff.

The Director and QA Manager participated in the opening and closing meetings. Human and financial resources required to produce food safely and in compliance with the standard are provided. The site is kept informed of relevant legislation, scientific developments, industry codes of practice, and technical updates through QA, suppliers, sector organizations, technical letters, and email notifications. An electronic version of the standard is in place.

The company is registered at Dutch authorities (CoC and NVWA) and registered at KCB (Dutch fruit and vegetable inspection number #20099592 (almost daily visit to the . The audit has occurred before the audit due date as indicated on the certificate. The minor non-conformity from the previous BRCGS audit has been resolved and effectively addressed to prevent recurrence. The BRCGS logo is not used.

An organizational chart is in place and documented in PR-01.03.10, dated 14-03-2023. The chart clearly shows the structure of the company, including all relevant managers and key functions, such as the Warehouse Manager, Commercial Employees, Logistics Manager, and Truck Driver. The structure is clear, and no departments or key functions have been omitted. Absent arrangements and deputies for key functions are documented in PR-01.03.10.

During the audit, it was verified that all employees were aware of their responsibilities. Employees demonstrated that work was carried out according to instructions. Responsibilities, such as receiving and inspecting loads at receipt, were checked.

N/A Clauses

1.1.12 The organization is not using the BRCGS logo.

2. Hazard and Risk Analysis

A prerequisite programme is implemented and detailed in the quality manual. The manual includes procedures regarding the condition and maintenance of buildings, equipment, and transport vehicles, as well as documented practices and procedures for handling damages, waste products, returns, allergen management, pest management, sanitation, supplier management, maintenance management, personal hygiene standards, and training.

The HACCP Team consists of the Director, QA Manager, and Warehouse Manager. The team is defined in PR-01.03.10 dated 26-11-2021, and there have been no changes to the HACCP Team since the last BRCGS audit. The HACCP Team leader, the QA Manager, is trained and competent.



Representatives of the HACCP team have demonstrated competence in understanding and applying HACCP principles. The company makes use of an external consultant, who is responsible for conducting internal audits, providing advisory services, and keeping management informed of relevant legislation.

The Food Safety plan is based on comprehensive information sources, such as customer and legislative requirements, codes of practice, and historical product safety hazards. The HACCP team was responsible for determining the complete process and product scope for the HACCP study, documented in PR-03.01.10, dated 12-11-2025.

Full product descriptions are defined as unprocessed fruits and vegetables. Food safety and legal requirements are documented sufficiently in the product specifications.

Hazard and risk analysis is based on Codex Alimentarius principles. The HACCP food safety team has conducted a hazard analysis to identify hazards that need to be prevented, eliminated, or reduced to acceptable levels. The severity and occurrence of each hazard were taken into account, using a scale from 1 to 4. The definitions for severity and occurrence are documented. A risk is identified by multiplying severity by occurrence. When the identified risk is greater than 6 and severity equals 4, the decision tree is used to further evaluate the risk.

The audit and onsite inspection confirmed the identified potential hazards as documented in the Risk Assessments. These include pathogenic bacteria such as *Bacillus cereus*, *Listeria Monocytogenes*, *Salmonella*, and *E. coli*, physical contamination hazards such as stone, glass, and wood, chemical contamination such as pesticide residues, patulin, and heavy metals, as well as allergens. The risk assessment results in an operationally validated HACCP system. A risk assessment for fraud and malicious contamination of products is documented in PR04-06.31, dated 12-11-2025, including claims, Country of Origin and Organic certification.

Flow diagrams for the complete process are in place and consistent with the actual situations and processes. The following flow charts were verified during the audit: PO-02.01.00, dated 15-03-2024. The processes of the company include purchasing, receipt, (cooled) storage, order picking, transport, and delivery to customers.

The flowcharts version 15-03-2024 were verified on during the annual verification, 19-02-2025. No daily or seasonal variations were considered, and no subcontracted activities are applicable.

All hazards that required control were reviewed to identify whether they are critical control points (CCPs). A decision tree was used in this review, and no CCPs were identified.

A procedure for corrective actions to be taken when monitored results indicate a failure to meet a control limit, or when monitored results show a trend toward loss of control, is documented in PR-05.06.10, dated 01-02-2022. This procedure outlines the actions to be taken by the competent and responsible person with regard to any products that have been manufactured during the period when the process was out of control. The procedure covers both corrective and preventive actions, as well as continuous improvement.



Procedures to verify whether the HACCP and food safety plan, including controls managed by the PRP, continue to be effective are in place. This includes internal audits, reviews of complaints and incidents. A verification was conducted on 19-02-2025 and concludes that study reflects the current operating situation and the effectiveness of the system by reference to complaint levels, rejects etc.). The prerequisite programmes are adapted when required or when deviations occur. No subcontractors are involved.

N/A Clauses

- 2.5: HACCP study has not been undertaken centrally.
- 2.11: there are no CCPs.
- 2.12: there are no CCPs.
- 2.15: there are no CPs or CCPs controlled by subcontractors or service providers.

3. Product Safety and Quality Management Systems

The food safety and quality manual is electronic and accessible to all staff members. Documents are legible and provide sufficient detail. In cases where necessary, the documents are provided in multiple relevant languages.

Quality Assurance (QA) is authorized to adjust documents and is responsible for the control of the manual. A procedure for managing documents that are part of the food safety and quality system is documented in PR-05.07.10, dated 01-02-2022. Changes are communicated to staff during meetings or onsite visits to the warehouse in Maasland. The document index is dated 12-11-2025 (OV-00-00-00).

Records are legible, well-maintained, and retrievable. No alterations to records were observed during the audit. Records are available in both hard copy and electronic form. They are stored securely and regularly backed up to prevent loss.

Records are retained for a period of at least three years, as outlined in procedure PR-05.07.10. This is well over the product shelf life + 1 year.

A scheduled program for internal audits is in place. The audits are conducted based on risk and are spread throughout the year, e.g. Management 19-2-2025; HACCP/TACCP/VACCP 12-11-2025; food safety culture 20-2025; production 12-5-2025 and 11-8-2025. The annual audit planning for 2025 OV-05.02.10 is documented. The internal audit scope includes HACCP, Food Safety Plan, PRP (cleaning and sanitizing, pest management, equipment and building maintenance, personal hygiene, staff training, purchasing, transportation arrangements, allergen controls, etc.), Food Defence, Food Fraud, and other relevant procedures. The program is documented in PR-05-05-10, dated 19-03-2024. Actions from internal audits are registered on the central action list, as seen for e.g.:

- 12-11-2025 1 broken lamp during internal audit, closed on 19-11-2025
- 12-11-2025, seen some product stored on ground, closed on 19-11-2025

Internal auditors are appropriately trained and competent, and they do not audit their own work.. External consultant K.T. audited chapters 4 through 10, including the warehouse in the Maasland



warehouse, on 12-11-2025. External consultant K.T. audited chapters 1-4 and 10, including the warehouse in Maasland, on 19-02-2025.

The internal audit program is fully implemented, and audit reports identify both conformity and non-conformity. Objective evidence of findings is included. Results are reported to the personnel responsible for the audited activity, and corrective and preventive actions, with specified timescales, are demonstrable. The completion of corrective actions is verified, and actions are recorded in the general action list and followed up promptly.

A program for hygiene inspections is in place to assess cleaning and housekeeping performance, as well as to inspect potential risks to the product from the building or equipment. These inspections are based on risk and occur weekly by the warehouse manager and quarterly by the QA Manager. The outcomes of these inspections are documented. Weekly inspections from weeks RF 04.01.10 year 2025 and 2026. Seen weeks 1 to 52 of 2025 and week 1 2026 were reviewed. The quarterly inspection reports seen e.g.: 20-2-2025, 9-7-2025 and 4-9-2025.

A documented procedure for handling and correcting failures in the food safety and quality system is in place, PR-05.06.10, dated 01-02-2022. Non-conformities are recorded in the general action list (RF-05.00.11, last registered action on 12-11-2025) and are investigated. The record includes clear documentation and assessment of consequences. Actions are addressed with appropriate timescales for correction, a responsible person, and verification that the correction has been effectively implemented. The general action list was reviewed, seen e.g.:

- 2-4-2025 checklist GG CoC labelling information check. Closed on 7-5-2025
- 12-11-2025 1 broken lamp during internal audit, closed on 19-11-2025
- 12-11-2025, seen some product stored on ground, closed on 19-11-2025

The company maintains a procedure for supplier approval and monitoring, documented in PR-04.06.10, dated 14-5-2025. Service suppliers, such as pest control, cleaning, cooling, maintenance, transport, and laboratory testing, are reviewed and monitored based on risk. Subcontracted transport services are monitored annually. Contracts and specifications are reviewed frequently, and supplier performance is assessed. A register of approved subcontractors is maintained in the ERP system.

A documented vulnerability assessment for product fraud risk has been carried out for all raw materials, as per PR-04.06.30, dated 18-1-2022, and the assessment PR-04.06.31 dated and verified on 12-11-2025. The assessment considers historical evidence of substitution or adulteration and other factors that may increase the risk of fraud.

A procedure for traceability is documented in PR-04.07.10, dated 18-01-2022. The traceability system ensures that products are traceable throughout the supply chain. The system includes the tracing of damaged packs and products returned to stock or disposal. The traceability system was tested, conducted on 20-2-2025 regarding mini cucumbers, and seen the reports of the 5 recalls. The test includes a summary of the documents which were referenced and clearly show the links between them. The test and documents were retained properly. The test was achieved within 1 hour.



During the audit, a traceability exercise was initiated for sales order 17-11-2025 #451454 in Ireland 5 boxes (5kg) of vine tomatoes. This product was traced upstream to purchase order #408833 with a total of 240 boxes (5kg) from supplier K. delivered on 17-11-2025. With a total of 22 sales orders of which 10 sales on 17-11-2025, 10 on 18-11-2025 and 2 on 19-11-2025. All (but one) orders were sold in Ireland and one in Denmark. The mass balance was complete and correct.

Accompanying documents seen:

- Sales order 17-11-2025 #451454 5 boxes of 5kg tomatoes
- Incoming CMR/ order receipt 17-11-2025 from supplier K. order #408833 with total amount of 240 boxes (5kg), total of 1200kg. 1200kg sold in 22 different sales orders, of which 25kg #451454 was chosen by the auditor for the traceability test
- RF 04.01.10 Weekly hygiene inspections, seen for whole of 2025 (in this case week 47, 2025), and week 1 2026
- Glass and brittle material check (quarterly) of 4-9-2025
- Complaints during period November ~January 2026
- RF 04.01.10 Cleaning records, seen weeks 1 to 52 of 2025 and week 1 2026 were reviewed
- Pest control inspections 3-12-2025 and 4-11-2025
- Cool cell temperatures 17 November 2025

No deviations encountered in the reviewed records.

A documented procedure for product withdrawals and recalls is in place, PR-04.08.10, dated 11-4-2025. The procedure outlines how to manage product withdrawals and recalls, including the identification of the recall team, responsibilities, communication plans, and actions to prevent recurrence. The procedure also specifies that the certification body will be notified within three days of any recall. No recalls have been conducted since the previous BRCGS audit, and all have been reported to SGS.

A procedure for managing non-conforming products is documented in PR-04.08.10, dated 11-4-2025. Non-conforming products are identified, reported, and stored securely to prevent accidental release. The procedure includes responsibilities for decision-making regarding product disposal or use and records of these decisions. An example of non-conforming product was observed during the audit, where a pallet of strawberries from Egypt GGN 404992B650467, arrival 1-1-2025 with mould was blocked. This will be returned to supplier. Non-conforming products are blocked in system and are visually blocked. Only the owner of the product can release the product and give the order to the warehouse what to do with it. Warehouse informs customers of all incoming orders, and if there are issues with the products this is immediately notified to the owner.

The company has contingency planning in place for business continuity in the event of major incidents. The procedures include identification of key staff, up-to-date contact details, alternative arrangements to meet customer expectations, and a communication plan.

Complaints are recorded, investigated, and actions are carried out by responsible staff, according to procedure PR-05.01.10 dated 11-4-2025. Complaints are analysed for trends and discussed in HACCP meetings and Management Reviews. The company experienced 1396 complaints in 2025,

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compared to 1,059 complaints in 2024 and 862 in 2023. Complaints regarding 2025 are categorized in 984 quality complaints; 101 price; 77 delivery; 52 weight; and 10 food safety complaints. No complaints or incidents regarding to foreign bodies. These were the products regarding the recalls, these were sent to 10 different customers therefor recorded as 10 different food safety complaints. Seen e.g.:

- 18-11-2025 complaint Frisee salad MRL deviations (internal)
- 9-1-2025 carrots with mould. Carrots are discarded of, and purchase is refunded
- 1-1-2025 strawberries with mould, returned to supplier. GGN 404992B650467

N/A Clauses

3.4 – 3.4.4: The company does not store or transport for third parties. All transport and storage is for their own products.
 3.5.3.2: there is no high risk of fraudulent product handling identified.
 3.7.2: only handling of own products.
 3.8.3: only handling of own products.

4. Site and Building Standards

The company is located and maintained in such a way that contamination is prevented. The premises are in good condition and well maintained, ensuring no adverse effects from the surrounding environment on food safety or food defence. The external areas are well kept, with paved roads and regular maintenance. Measures such as external pest control are in place and reviewed periodically. The building fabric is maintained to minimize the risk of product contamination. During the audit, no bird-roosting sites, gaps, or ingress of water and contaminants were found.

A documented risk assessment of potential risks to products from deliberate contamination or damage is available in TACCP PR-05.08.11, last reviewed on 12-11-2025. The assessment covers internal and external threats such as contamination from unauthorized access, malicious staff or ex-staff, contamination of raw and packaging materials, and not closed vehicles. Security measures include closed doors, staff entrance with face scans or access codes, and CCTV. These measures are verified through weekly inspections. Access to production and storage areas is restricted to authorized personnel only, and contractors and visitors are controlled via a sign-in system at reception. Staff receives annual training, and quarterly security inspections are performed, including the latest on 17-02-2025.

The site layout is documented in OV-02.01.10 dated 16-10-2024, including details such as access points, travel routes for personnel and products, waste removal, and storage areas. Process flows are described in the HACCP Study. The premises provide sufficient working space to ensure operations are carried out under hygienic conditions, preventing product damage. Incompatible products are stored separately to minimize the risk of taint or cross-contamination. The positioning of machinery, equipment, and site facilities does not compromise product integrity. Storage areas for cleaning and maintenance chemicals are appropriately sited to avoid compromising food safety, legality, and product integrity. No cleaning areas are observed in the facility. Vehicles are loaded and unloaded in covered bays, protecting the product. Temporary structures are not present.



The fabrication of the site uses materials suitable for its food production purposes. The walls are constructed from bricks and smooth plates, and there is no observed condensation or mould growth. The floors are impervious, made of concrete, and in good condition to withstand cleaning. Ceilings are constructed and maintained to prevent contamination, and the building is designed to prevent pest entry. Windows are not designed to be opened, and internal and external doors are maintained in good condition. External doors to enclosed product areas have measures to prevent pest ingress. Lighting in work and storage areas is adequate, and ventilation is sufficient across all areas, with no condensation or excessive dust observed.

Storage facilities for personal items are available for staff. Hand washing facilities are present at every entrance to the production areas, including sanitizing stations. Toilets are adequately segregated and not directly connected to storage areas. Hand washing facilities, with soap and water at a suitable temperature, are available, along with adequate hand-drying facilities. Advisory signs for hand washing are visible.

Smoking is prohibited in production and storage areas, with controlled, designated areas provided outside. Electronic cigarettes are not permitted in production and storage areas, as documented in PR-04.03.10 date 17-10-2024. Food brought by staff has been assessed in PR-04.03.10. A refrigerator is available for staff to store refrigerated food, and separate lockers are provided for non-refrigerated food. The refrigerator is kept clean and tidy, and no catering services are provided.

N/A Clauses

- 4.1.5: no external storage
- 4.3.7: there are no cleaning facilities
- 4.3.9: no temporary structures observed
- 4.4.3: no need for drainage. Only dry cleaning.
- 4.4.4: no water used for cleaning or in contact with products.
- 4.4.5: no building voids.

5. Vehicle Operating Standards

The load-carrying areas of vehicles are inspected prior to loading. This includes checking the walls, ceilings, and floors for cleanliness and good condition, ensuring door seals are intact, and confirming there is no presence of pests, strong odours, or excess humidity. Load supports, lashing points, lock strips, and fastenings are maintained in good condition and are adequate in number. There are no curtain-sided vehicles, rear door shutters, tail lifts, bulk tankers, transfer hoses, or pumps used.

A risk assessment related to the security of the load during transportation is documented in PR-05.08.11, dated and reviewed on 12-11-2025. This assessment includes potential internal and external risks to product security during transport. Appropriate controls, such as placing seals on trailers, are implemented to reduce risks. The risk assessment is reviewed annually during the management review or more frequently if new risks emerge, such as a newly identified threat or an incident implicating product security or product defence.

Access to vehicles is restricted to authorized personnel only. Drivers and delivery staff are familiar with and understand procedures for maintaining the security of the vehicle. These procedures are



documented in WI-02.01.60, dated 17-10-2024, which includes guidelines on the types of products handled, exceptions to product transport, segregation controls, and restrictions on mixed loads and waste handling. The driver has access to this information and understands it.

Vehicle load areas are fully enclosed, and doors are locked when the vehicles have been loaded. Seals are placed on trailers heading to the UK, and the integrity of the seals is checked before collecting the trailers from the ferry in the UK. If access to the load-carrying area occurs, actions are immediately taken, including contacting the Transport Manager and starting an investigation. There are procedures in place to manage any risk to product safety if an incident occurs, either before or at the point of loading or unloading. These procedures include appropriate controls for reporting incidents internally and externally, to customers and relevant authorities, and managing any contamination risks to products.

A system is in place to ensure that road vehicles are maintained in a roadworthy condition. Vehicle operators are not required to be registered with authorities, as outlined in WI-02.01.60. In the event of vehicle breakdown, accidents, or incidents, procedures are in place to maintain product safety, legality, and quality. These procedures include clear instructions and emergency contact numbers for drivers, as well as instructions on preserving the temperature or other environmental controls appropriate to the load. Required checks are made and recorded on the load before continuing the journey.

Five trucks (two in the UK) and twelve trailers are maintained in a roadworthy condition. Records were reviewed including for the following:

- Truck 09BHR9 Mercedes APK valid until 25-7-2026
- Truck 25BJB7 Mercedes APK valid until 14-10-2026
- Trailer OP92NP APK valid until 18-1-2026, F-gas check on 29-12-2025
- Trailer OP93NP APK valid until 22-1-2026, F-gas check on 9-12-2025
- Trailer OS74TN APK valid until 7-6-2026, F-gas check on 30-6-2025

Trailers are equipped with cooling systems that include calibrated probes. Checks are carried out and recorded by truck drivers at an appropriate frequency, ensuring that temperature limits for the safety, legality, and integrity of the products are not exceeded. Records of inspections are maintained in MS Excel from August 2024, with a set point of 4°C, seen August and September 2025 and January 2026. The temperature is checked as soon as the trailer is collected from the ferry by the truck driver. The temperature value is communicated to the planner and recorded in MS Excel. Logs can be extracted from the cooling system if requested by the customer or in case of issues.

Settings for temperature control are adjusted and verified by trained staff before loading and dispatch. Vehicles transporting chilled products are checked to ensure they are at a suitable temperature before loading. These adjustments are completed and verified. Verified temperature for trailer OT55JH 7-1-2026 6,2C and 9-1-2026 4,2C. Set at 4C. Also verified August and September 2025 and January 2026 no significant deviations seen.

Temperature checks are conducted during transportation. For example, trailer OT55JH 7-1-2026 6,2C and 9-1-2026 4,2C at arrival in Harwich. Other checks include monitoring of temperature



ranges, with temperatures between 4-7°C recorded in August and September 2025 and January 2026 no significant deviations seen.

Loading and unloading operations are performed to maintain the product temperature within specified limits. Procedures are in place in case of equipment failure to ensure the temperature is maintained and product integrity is not compromised.

N/A Clauses

- 5.1.7: No transport hoses
- 5.1.8: No bulk containers

6. Facility Management

The two forklift trucks, ten pallet trucks, two pallet film wrappers, and sweeping machine are in good working order and maintained to prevent damage to products. No racking is in place, and no diesel-powered handling equipment is used. The site does not use physical automation systems, including vertical lifts, retrieval systems, conveyor systems, or robotics, for product-handling activities.

Procedures are in place to monitor the condition of wooden pallets and plastic trays to prevent contamination or damage to products. Knives and other sharp tools provided are used in a way that prevents product damage. Snap-off blade knives are not used.

A documented planned maintenance schedule is in place and includes all plant and equipment. Maintenance requirements are defined when commissioning new equipment. The safety, legality, and quality of products are not jeopardised during maintenance operations. Third-party contractors and engineers are made aware of the site's operating standards, including hygiene standards and contamination control policies. Cleaning or replacing light fittings and glass is done in a manner that minimises the potential for product contamination. Records are kept of vehicle and equipment maintenance. Temporary repairs or modifications are only permitted in emergencies where product contamination is not at risk. Such modifications have a time limit and are recorded and scheduled for permanent repair. The following maintenance actions have been recorded:

- 6-11-2025 cooling installation #121041 preventive maintenance and F-gas check
- Overview of maintenance on vehicles (forklifts) is done on form OV-04.12.10. Seen for the following :
 - o Forklift SN6385267 maintenance and certification on 20-5-2025
 - o Forklift SN 6385268 maintenance and certification on 20-5-2025
 - o Electric forklift SN 21AE1926 maintenance and certification on 20-5-2025
 - o Electric forklift SN FBMF-11794 maintenance and certification on 20-5-2025

All measuring equipment used to monitor product quality is identified and controlled. A documented list of equipment and its location is maintained, along with an identification code and calibration due date. Measures are in place to prevent adjustment by unauthorized staff and to protect the equipment from damage, deterioration, or misuse. No critical control points (CCPs) are identified. The measuring and monitoring devices are checked at a predetermined frequency based on a risk assessment. When deviation occurs, the devices are replaced or sent to the supplier for repair. Equipment is readable and of suitable accuracy for the measurements it is required to perform. Procedures are in



place to record actions when measuring devices are found not to be operating within specified limits. The following calibrations have been documented:

- Thermometer calibration SN 70109970 with calibration valid until 06-2025.
- Weight scale calibration (is only used for indication, not for commercial purposes) calibrated internally on 17-2-2025
- Sense Anywhere system for temperature monitoring on calibrated 17-02-2025. Temperature deviations of 0.2–0.3°C are within the acceptable 1°C range.
- Trailers are calibrated externally and internally, internal check seen on 11-2025

The warehouses are sufficiently cleaned, with no old dirt observed during the audit. Documented cleaning schedules are in place and implemented. Cleaning is conducted by in-house staff. There is no Clean-in-Place (CIP) cleaning system. Chemicals used for floor cleaning include Metech Vloerreiniger Extra, with the safety data sheet (SDS) dated 12-09-2022. The effectiveness of the cleaning and sanitation procedures is verified and recorded. Weekly inspections from weeks RF 04.01.10 year 2025 and 2026. Seen weeks 1 to 52 of 2025 and week 1 2026 were reviewed. The quarterly inspection reports seen e.g.: 20-2-2025, 9-7-2025 and 4-9-2025.

Waste is limited to packaging materials, paper, and damaged wooden pallets. Bins and containers are in place to minimise waste accumulation in handling and storage areas. External waste collection containers are managed to prevent pest attraction. Containers holding food products and packaging are closed. No spillages or food residues leaking around containers were observed during the audit. No compacters are on-site, and no categorised waste is generated. There is no surplus or substandard trademarked material, and products are not sold to staff or charities.

Pest control is outsourced to Anticimex. The contract, dated 23-12-2016, includes eight inspections for rodents and flying insects. There are 3 electric fly killers (EFKs), 14 snap traps inside, and 4 snap traps outside, covering the entire premises. The locations of all pest control measures are identified on an up-to-date bait plan, dated 23-02-2022. Trend analysis shows no activities in the past 2 years. Sampled traps included rat trap #2 and #3 outside, and #7 and #13 inside which matches the online sit map. The most recent inspection reports are dated 3-12-2025, 4-11-2025, 6-10-2025 and 21-7-2025, with very incidental activity. An in-depth inspection was performed on 03-02-2025. Advice from the in-depth and regular inspections are actioned, and any identified issues, such as a damaged snap traps are promptly addressed, and actions are closed. No pesticides, insecticides, or fumigants are used on-site. Pest control awareness is part of the induction process and repeated hygiene training. The most recent annual verification was conducted during the management review on 19-2-2025. The employee M.S. is a certified technician with EVM valid until 12-4-2026.

N/A Clauses

- 6.1.2: No racking.
- 6.1.3: No diesel powered equipment.
- 6.1.4: No physical automation systems.
- 6.2.6: No temporary repairs observed.
- 6.4.4: No CIP.
- 6.5.4: No trademarked materials on site.
- 6.5.5: There are no surplus customer-branded products disposed.

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6.5.6: There are no surplus customer-branded non-conforming products sold to staff or passed to charities.

7. Good Operating Practices

The procedure for the inspection of loads on arrival is documented in WI-02.01.20, dated 11-4-2025. This procedure ensures that products are free from pest infestation, contamination, or damage and are in satisfactory condition. There are no additional procedures required to ensure loads and products are under secure conditions before acceptance. Shelf-life codes are not marked on the products. A FeFo-based stock rotation system is in place (based on de freshness of the products). An example of rejected strawberries was observed due to quality issues.

Personnel who must be aware of products requiring specific handling conditions are trained in the procedures. These procedures include instructions for handling different product types, segregation of products where necessary to avoid cross-contamination (physical, chemical, microbiological, or allergenic), mixing of sorts, or taint, and specific handling requirements to prevent product damage. Loading is carried out to prevent damage, and products are secured to prevent movement during transit.

No products are repacked onto pallets for storage or further distribution. The packing configuration prevents the risk of damage, and no overhanging cases were observed. Products are stored off the floor and away from the wall.

No environmental monitoring is applicable, as only unprocessed vegetables are stored in cooled conditions, with no critical temperature or controlled atmosphere storage in use.

Temperature-controlled storage is appropriate for maintaining the specified temperatures. A system to record temperatures with setpoints for alarms is operational. The temperature is logged every 5 minutes. The alarm procedure works as follows: an SMS and email are sent by the system. The alarm setpoints are 4°C for cool cells and 10°C for other cooled areas, with high and low-temperature thresholds set at 10°C and 1°C for the 4°C cooling cell, respectively, and no alarm delay time. During the audit, records for cool cell temperatures from the month of September and 17 November 2025 were verified, including live temperatures: “dock 1-2” 9,5°C; “dock 3” 7,4°C; Cool cell “fruitcel” 3,8°C; “groentecel” 2,1°C; warehouse 8,5°C. Settings can only be adjusted by authorized and trained staff, specifically the Warehouse and QA Manager. No controlled atmosphere storage is in place, and there are no restrictions on product placement.

Glass and other brittle materials are excluded as much as possible or monitored for breakage. Electric fly killers (EFKs) are protected against breakage. A procedure for handling glass and other brittle materials (other than product packaging) is documented in PR-04.05.10 dated 11-10-2023. This procedure includes a detailed list of items with their location, number, type, and condition, as well as cleaning and replacing guidelines to minimize the potential for contamination. Inspections of these items are conducted every six months, based on a risk assessment. The last inspection was conducted on 13-08-2025. The procedure includes actions to be taken in the event of breakage, such as quarantining products and the affected area, cleaning, inspecting the area, changing workwear,

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recording, and safely disposing of contaminated products. No incidents of breakage were reported in the last year. Light strips, including EFKs, are protected against breakage.

Control of cleaning chemicals on-site is demonstrated through proper storage. Cleaning chemicals are kept locked away with authorized access only by trained and authorized personnel. No lubrication is used on-site. An approved list of chemicals was verified, and the safety data sheet (SDS) for Metech Vloerreiniger Extra, dated 12-09-2022, was reviewed.

A FiFo-based stock rotation system is implemented and operational. Receipt documents and product labeling facilitate correct stock rotation. An effective system is in place to identify the location of stock within the storage area, which supports the handling of products with due regard to their shelf life for onward sale and compliance with the minimum specified shelf life on delivery.

Products are released for dispatch only if all checks are completed. Records are kept and verified by the QA team, and once confirmation is received, the products are released.

An assessment of allergen-containing products has been conducted and documented in the HACCP study, referenced in PR-03.03.11. The identified allergen is celery. A dedicated storage area near the unloading docks is used to reduce the risk of allergen contamination. Sheets are used to separate allergen-containing and non-allergen-containing products on pallets, in accordance with WI-02.01.60 dated 17-10-2024. Spillage procedures also follow this procedure/ work instruction, due to the fact that only whole celery is stored/ sold and no powders/ fluids are stored on site.

N/A Clauses

- 7.3.6: no controlled atmosphere storage.
- 7.3.8: no recent changes to equipment.

8. Personnel

Procedure PR-04.04.10 training and education dated 18-1-2022 and overview OV-04.04.10 dated 23-02-2022. All relevant personal, including agency supplied staff, is trained appropriately prior to commencing work and is adequately supervised throughout the working period. No CCP's.

Basic course HACCP for HACCP team (every 3 years), performed in February 2025. Warehouse and commercial staff is trained by e-learning for HACCP and Hygiene. Training records were verified for warehouse supervisor R.W. 2-2025, sales S.H. 2-2025 and warehouse employee A.R. 2-2025. Signed personal hygiene declaration seen for B.L. (CEO) 12-2024, Sales M.P. 12-2024, R.W. 12-2024, warehouse employee A.R. 12-2024.

New hires and agency workers sign "requirements for personal hygiene" documented in PR-04.03.10, as seen for V. signed 11-12-2024. Additionally, QA manager P.B. followed a course "Food safety for field vegetables"

Documented programmes covering the training needs of relevant personnel are in place. This includes identifying the necessary competencies for specific roles, providing training or other action to

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ensure staff have the necessary competencies, reviewing the effectiveness of training, delivery of training in the appropriate language of trainees.

Records of training were demonstrable and includes: the name of the trainee and confirmation of attendance, the date and duration of the training, the title or course contents, the training provider, for internal courses, a reference to the material, work instruction or procedure is used in the training. The company routinely reviews the competencies of its staff and provides relevant training (training, refresher trainings, on-the-job).

The requirements for personal hygiene are documented in PR-04.03.10 dated 17-10-2024.

This includes all requirements of the BRCGS S&D standard of 8.2.

Smoking is prohibited in the production and storage areas. Controlled designated areas are provided outside and pose no risk for product and process.

Electronic cigarettes (e-smokers) are not permitted to be used or brought into production and storage areas and is documented.

Company clothing is provided in sufficient numbers for each employee and suitable designed to prevent contamination of the product. Based on risk, no hair nets and beard snoods are provided.

All cuts and grazes on exposed skin must be covered with a blue plaster.

No blue plasters (or other coloured), cuts and grazes were observed during the tour.

The storage of personal medicines is included in the hygiene rules (must be stored in the personal locker). Lockers are available in sufficient numbers.

Employees are made aware of the symptoms of infectious diseases in the hygiene rules. Staff is required to report this when suffering one of them. The rules must be signed in prior to commence work. Visitors and contractors are made aware on the types of symptoms, infection, disease or condition in the rules for visitors. It is not permitted by law to complete health questionnaires.

Visitors and contractors record their visit at the entrance. This includes a statement they are free from any symptoms. During the tour no deviations were observed.

N/A Clauses

8.1.4: there are no CCPs.

9. Handling of open food products

The company handles unprocessed fruits and vegetables. These are mostly packed in cartons. These can be open at the top. All products will have a handling at the customer / consumer. A site map with routings is documented in OV-02.01.10 dated 16-10-2024. Products are not prone to microbial growth. Hand wash facility is present when walking from staff facilities (canteen and toilets) to product handling areas. The hand wash facilities are equipped with liquid soap, paper towels and running warm water. Based on risk, no protective clothing for the product is used.

Staff have company clothing, and this is washed by staff according to site issued procedure WI-04.03.10 dated 16-02-2022. No changing rooms required. There is a separate room near the canteen with personal lockers in sufficient amount for the amount of staff. Products do not come into direct contact with water, steam, ice, air, compressed air or other gases. No lubrication is used onsite.

Cleaning is limited to dry cleaning of most areas. Only the floor is cleaned wet with the floor scrubber.



No need for disinfection. No protective clothing is provided. This is justified by the facts that the product is not vulnerable for pathogen growth (unprocessed fruits and vegetables) and that the products are not handled directly. All products stay in their original packaging. Staff working with the products have caps and hats. Blue plasters are available and site-issued in case of cuts and grazes and are stored on designated location.

N/A Clauses

Click or tap here to enter text.

10.1 Wholesaler Module

The system works as follows: Purchased products are inspected and booked in the electronic warehouse system upon arrival in the warehouse. The system also ensures traceability of damaged packs and of products returned to stock or disposal.

The traceability system is tested annually across the range of products.
 19-9-2025 recall mock test on product honey melons loaded on 17-9-2025 with mock scenario MRL too high, batch 477020 from supplier K. to customer J. order number 406286. Test took 30 minutes in total. Also reviewed the 5 recalls. All within 2,5 hours (mass balance, informing customers and informing NVWA and SGS).

A procedure to manage product withdrawals and recalls is documented: PR-04.08.10, dated on 11-4-2025. The procedure includes reporting and effectively manage incidents and potential emergency situations and details how and when a recall or withdrawal needs to be instigated and responsibilities of the team members. The procedure and traceability test clearly state that the certification body will be notified within three days.

N/A Clauses

Click or tap here to enter text.

10.2 Branded Products

The company is wholesaling fresh unprocessed fruits and vegetables. Some of these products are supplier branded. Supplier approval is, however, the same for all products and is described in detail in chapter 10.3.

N/A Clauses

Click or tap here to enter text.

10.3 Other Wholesale Operations

Procedures for approval of suppliers of raw materials and packaging materials are documented in PR-04.06.10, dated 11-4-2025. Produce suppliers are approved on filled questionnaire and GFSI benchmarked certificate. An overview of approved suppliers was seen in MS Excel, also used for monitoring of supplier's performance. Suppliers were reviewed according to annual frequency.



The organization uses approx. 130 suppliers, of which approx. 70% Global Gap certified. 37 transport service suppliers of which 7 BRCGS certified, and 7 IFS certified); 19 service suppliers. No third-party storage hired.

Suppliers must be Global Gap certified or sign a supplier questionnaire. Low risk suppliers can be approved based on a signed questionnaire.

Seen:

- N. (fruit) IFS Food certified valid until 10-7-2026 and questionnaire signed 18-6-2024
- M. (fruit) IFS Broker certified until 8-3-2026 and questionnaire signed 31-1-2025
- M. (potatoes) questionnaire signed 10-3-2025
- O. (fruit) IFS Broker valid until 6-4-2026, questionnaire signed 5-6-2024
- J. (grower leek) GG valid until 7-9-2026 GGN4050373110123
- M. (grower onions) GG valid until 16-8-2026 GGN4050373198640
- R. (grower carrot) GG valid until 15-2-2026 GGN4049928387899
- Transporters: D. BRCGS S&D valid until 13-03-2026, questionnaire signed 10-2-2025
- H.T. BRCGS S&D valid until 13-9-2026, questionnaire signed 3-2-2025
- J. ISO22000 valid until 9-4-2026, questionnaire signed 12-2-2025

Supplier evaluation is based on complaints, service and documentation. The review is done monthly in HACCP meeting most recent on 15-12-2025.

There are no exceptions. There are more suppliers for the same products. Depending on the day price it is decided where to buy the products.

There are no customer requirements related to supplier approval. Some suppliers request periodically pesticide residue analyses certificates. Most retail customers want the products to be sourced from Global Gap certificated growers. This is all arranged in the supplier approval procedure.

The fraud vulnerability assessment plan is documented in PR-04.06.31. There are no processes identified as vulnerable to food fraud. Main reason for this is that transport and storage is only for own products. The fraud risk assessment is latest verified on 12-11-2025.

- There is no product or packaging development. Products handled are fresh unprocessed fruits and vegetables in cartons. No development likely.
- Specification for unprocessed fruits and vegetables are in general, generally known global trading standards, such as the UNECE standards. These specifications are used from the UNECE website and sent to the customers. All specification were verified to be still valid.
- Labelling is not done by company
- Incoming goods are inspected on quality, quantity and damages (including pests). Records are maintained in Green Commerce.
- Claims handled is organic. The company is certificated by SKAL for organic products. However there has been no organic products sourced or sold in the last 12 months.
- Pesticide residue analyses and sampling are conducted by Food Compass. Several products were collected, and no deviations (pesticide residues) were found. The laboratory is accredited against 17025 (Groen Agro Control, L335) Results were verified. for Food Compass:

SGS United Kingdom Limited Theta Building, Lyon Way, Frimley, Camberley, GU16 7ER. E-mail globalbrc@sgs.com

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- 10-11-2025 clementines from Spain. 6 substances found no MRL or aRfD deviations
- 10-11-2025 limes from Brazil, 3 substances found no MRL or aRfD deviations
- 22-8-2025 iceberg lettuce, 3 substances found no MRL or aRfD deviations

Company holds certificates for organic and Global Gap CoC:

- Organic, valid until 1-1-2027
- Global Gap CoC #4069453279407 valid until 9-6-2026

N/A Clauses

10.3.4. – 10.3.4.6: there is no product or packaging development. Products handled are fresh unprocessed fruits and vegetables in cartons. No development likely.
 10.3.6: no internal laboratory.

12. Ecommerce

Not applicable

N/A Clauses

Click or tap here to enter text.

13. Contractual arrangements (all services)

Not applicable

N/A Clauses

Click or tap here to enter text.

14. Product Inspection

Not applicable

N/A Clauses

Click or tap here to enter text.

15. Contract Packing (Repacking, Assembly Packing)

Not applicable

N/A Clauses

Click or tap here to enter text.

16. Quantity Control Inspections

Not applicable •

N/A Clauses

Click or tap here to enter text.

17. Contract chilling/freezing/tempering/defrost and high-pressure process operations

Not applicable

N/A Clauses

Click or tap here to enter text.

SGS United Kingdom Limited Theta Building, Lyon Way, Frimley, Camberley, GU16 7ER. E-mail globalbrc@sgs.com

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18. Contact Cleaning of baskets, roll cages and other distribution containers
Not applicable
N/A Clauses
Click or tap here to enter text.

19. Waste recovery and recycling
Not applicable
N/A Clauses
Click or tap here to enter text.