

Audit Report

Global Standard for Food Safety Issue 8: August 2018

1. Audit Summary			
Company name	Bel' Export	Site Code	2069355
Site name	Bel' Export		
Scope of audit	Sorting and packing of fruit and vegetables in different packaging material (PE trays, PP punnets, net-pack, flow-pack, PE and PP bags, carton boxes, wooden and plastic crates and plastic bulk).		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Finish Date	2020-06-05		
Re-audit due date	2021-06-04		

Additional modules included			
Modules	Result	Scope	Exclusions from scope
Choose a module	Choose an item		
Choose a module	Choose an item		

Head Office	No
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2. Audit Results					
Audit result	Certificated	Audit grade	AA+	Audit type	Unannounced
Previous audit grade	AA+		Previous audit date	2019-03-11	
Certificate issue date	2020-07-07		Certificate expiry date	2021-07-16	

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	3



3. Company Details			
Address	Neremstraat 2 B-3840 Borgloon		
Country	Belgium	Site Telephone Number	+ 32 12 44 05 56
Commercial representative Name	Gaston Derwael	Email	gaston.derwael@belexport.com
Technical representative Name	Gaston Derwael	Email	gaston.derwael@belexport.com

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3
Shift Pattern	8 hours / 6 days				
Subcontracted processes	No				
Other certificates held	IFS, AutoControlGuide (Belgian standard)				
Regions exported to	Europe				
Company registration number	AER/LIM/002764 - Vestigingsnummer: 2.066.000.030				
Major changes since last BRC audit	Replacement of sleeve line from plastic sleeves to cardboard sleeve, replacement of the fruit supply into the washing bath, installing a new packaging line Sorma, renovation of stairs to staff facilities.				
<p>Bel'export is a family owned company, started in 1994. It originated from a family business growing apples and pears. The management is the third generation professional apple and pears grower. This agricultural business still exists, and currently occupies 100 ha. The company works with two cooperation's of growers, both certified for Global Gap. Other products are bought from the local and national fruit auction. The company is sorting and packing apples and pears for the market. At this site, the company has several (5) different production lines: a sorting line for apples/pears, a cooling line for cherries and several packaging lines (netpack, flowpack, manual line for bags, and multiple lines for filling crates). Last year there is a replacement done for a sleeve line which uses cardboard instead of plastic, a new packaging line Sorma is bought (existing technology) renovation has been done on the stairs to the toilets.</p> <p>Bel' Export markets its fruit and vegetables under the name 'Bel' de Looz'. The Bel' de Looz and Bel' de Looz Superior labels contain an assortment of fresh fruits and vegetables including apples, pears, soft fruits (mainly cherries, strawberries) and vegetables (leek, tomatoes). Cherries, strawberries, leek and tomatoes are purchased and packed. These are seasonal products.</p>					



Most important customer countries are Great-Britain, Belgium, Spain and Scandinavia. Export to Germany is growing. Export to Asia is also growing: e.g. India. Customers are retail and wholesalers. On average 7% of the production goes to the processing industry. The turnover in 2019 was around 50000 tons. The total area is 15.000m², of which 5.500 m² of constructed area. The last warehouse was built in 2009. There is still room to expand in two directions. There are 10 precooling (transit) cells and 42 storage cells. The company has 55 employees in total. All of them are employed by Bel' Export. On one line there are two shifts (6.00 – 14.00 and 14.00 – 20.00). Personnel are mainly coming from Belgium, Poland, Romania and the Czech Republic. Housekeeping is facilitated by the company. A house complex building is built for the employees. In every team there is a quality supervisor and a traceability supervisor. Transport is partly subcontracted, but the company also owns 3 trucks. The trucks of the company are to deliver customers any time. This was the third unannounced audit at the site. Late audit due to issues related to COVID 19. The 2 Minor NC's from the previous audit are handled in the right way and closed.

5.Product Characteristics					
Product categories		05 - Fruits, vegetables and nuts			
Finished product safety rationale		Ambient <20°C, short shelf life product (< 10 days)			
High care	No	High risk	No	Ambient high care	No
Justification for area		Fresh fruits and vegetables that are unprocessed and do not support the growth of pathogens or the survival of pathogens if intact. Decision tree chilled, step 3; "no"; Low Risk			
Allergens handled on site		None			
Product claims made e.g. IP, organic		none			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Packing pears in consumer trays, in bulk packaging. Packing of apples in consumer trays.			

6.Audit Duration Details			
On-site duration	14 man hours	Duration of production facility inspection	7 man hours
Reasons for deviation from typical or expected audit duration	Low complexity process		
Next audit type selected	Unannounced		



Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2020-06-04	08:00	18:00
2	2020-06-05	08:00	12:00

	Auditor (s) number	Name	Role
Auditor Number	053293	Christel De Smet	Lead Auditor
Second Auditor Number	N/A		Please select

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Gaston Derwael / Quality Manager	X	X	X	X
Hendrik Derwael / Production Manager		X		
Elena Eredzebova, operation manager, Line 3		X	X	
Sven Vandenborne / Traceability			X	
Marcel / Tech department		X		
Mohammed Zeriouch, / Cleaning		X		
Eric Smets/Consultant			X	X



Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	Requirement ref.	Details of non-conformity	Critical or Major?	Anticipated re-audit date

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date



Major							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by

Minor							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	1.1.13	Non-conformity: Old BRC logo published on website	New BRC logo has been adapted on our website and invoicing documents.	Verification of new logo is compliant with the new logo.	We hadn't noticed any change in the BRC logo. Minor 1 BRC Logo aangepast op facturen en website Bel'Export	2020-06-25	CDS
2	5.4.2	The company has a Food fraud procedure dd 24/1/17 which states the use of a 4 x 4 matrix to determine the risks related to food fraud. The company also has a VACCP questionnaire	The procedure 7PR040 has been clarified with regard to the working method of the VACCP questionnaire.	Will be evaluated in the adapted way annually during the HACCP study. Verification of the document has been clarified.	The way we worked before was clear to us. Minor 2 7PR040 Fraudebestrijding(24.01.17)	2020-06-21	CDS



		to determine actions to be taken. This is updated every year dd 24/11/2019. Non-conformity: there is no link between the work method of the procedure and the VACCP questionnaire.					
3	6.4.2	Non-conformity: the oven for rodac plates isn't included in the calibration scheme.	Calibration document 070 was drawn up for the rodac plates furnace.	Will be calibrated annually with the other measuring instruments. Verification: Deviation has been determined and adjusted with calibration.	Calibration document was overlooked. Minor 3 Kalibratie Broedstoofje Swabanalyses	2020-06-21	2020-06-25

Comments on non-conformities



Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date



Major							
No.	Requirement ref.	Details of non-conformity	Corrective action taken	Root cause analysis and proposed action plan	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by



Minor							
No.	Requirement ref.	Details of non-conformity	Corrective action taken	Root cause analysis and proposed action plan	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by



Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The general quality policy is dated 15-1-2016, verified during the Management Review date 2020-01-04. A signed copy of this policy has been distributed and the policy has been reminded to all personnel in the general training. Effectiveness of meeting is monitored, date 2020-01-04, procedure monitoring effectiveness of training according to Procedure 6.PR003, date 31-10-2003. Conclusion is reported in MR, 2020-1-04.

Objectives have been verified in MR 2019-01-04 and identified for 2019 all reported in MR 2020-01-04: Subjects are: maintaining certification (achieved), increase 3% in volume (not achieved), no increase of complaints in function of turn over in kg (achieved), no recalls concerning pesticide residues (achieved), decreasing wooden boxes (pollux), pesticide residue control, differentiation of export.

The most recent management review is dated 2019-1-19. Objectives have been discussed, all processes have been commented, complaints and improvements are mentioned. Infrastructure is being discussed, as well as authenticity. Trend analyses of use of water, electricity, are also included. An action list resumes all actions to be taken. Verified meeting reports: 04-1-2020, 4-04-2020, 25/4/20 (due to covid).

The objectives are recorded in the Policy Manual dd 2019-1-19. They are in line with the objectives of previous years. The objectives are reviewed every 3 months a year (4 times evaluation report) 04-1-2020, 4-04-2020, 25/4/20

A separate chapter is made on sustainability. Environmental objectives haven been documented (verified reports e.g. 2020-1-4). Verified policy environment 2020-1-14. An objective is on-going to sell free from residue pears. The company puts a lot of effort in sustainability chain, from farm to fork concepts in chemical residues after harvest & promotion of biological components during crop phase.

7PR 04 dd 2/4/2019 'Food Safety Culture' has been assessed which states that the effectivity of the Food Safety Culture will be discussed during the quarterly management reviews. Food Safety Culture has been implemented by organising quarterly meeting wherein staff is asked for communicating improvements. However due to the horizontal structure, staff doesn't wait until these meetings. Seen reports of 08/04/19 - 4/10/19 - 4/1/20. Improvements formulated by staff: supply more tidy manner of all present work instruction, increase hand hygiene equipment due to Corona.

Verification is done in the quarterly management reviews.

The whistle blowing principe has been handled by establishing 3 persons of trust which report anonymous events reported by the employees. As this company is a family business, all events are directly reported to the general director.

Verified Chapter 20, site hygiene inspection e.g. 4-1-2020, 7-12-2019, 14-11-2019. At random control GMP rounds on e.g. transport, process, storage areas, machines, locations, personal hygiene, cleaning hands, hygiene ULO, site terrain inspections. All records filed and communicated to responsible persons. Results are seen to score from excellent to good.

Management uses excel pivot tables to analyse relevant production data. Management is participating in different IWT-projects with universities, e.g. to improve transport conditions for overseas deliveries.

The company has a BRC Participate log-in. Management is aware of the last changes. Management has done the self-assessment on the BRC version 8, during internal audit. Management G.D. has been trained in the new version 8 of the BRC Food Standard.

Management is very involved in the evolution of both production and quality / food safety processes.



Verified the verification on the latest technical and legal information, available in the Management Review of the company.

The 2 minors from the last audit were adequately resolved.

Minor: Old BRC logo is published on website.

1.2 Organisational structure, responsibilities and management authority

It is a family owned business. Communication lines are very short and the Managing Director is present on the work floor every day. Before, quality management was done by the Managing Director. The company has also an consultant for performing internal audits, changes in legislation. The organisation chart is dated 04/10/2014, reviewed and still valid, Chapter 5. Substitutes have been appointed in a separate document. Responsibilities are known and understood.

The most important work instructions are hanging out in the refectory or at other assembly points, but all quality documentation can be consulted if necessary. Verified work instructions: WI HYG PP1.

Details of non-applicable clauses with justification

Clause/Section reference	Justification
/	

2 The Food Safety Plan – HACCP

The food safety plan is based on the Codex Alimentarius HACCP principles. It is rather complicated, but fully implemented. It is based on relevant information. Adequate knowledge is available and preventive measures are in place.

The scope of the HACCP study is clearly stated in the document Chapter 1 Scope dd 5/1/2015: the scope is determined as storage, sorting, packing, purchase, sales and transport of fruit and vegetables. References to standards and supplier (certification) requirements are documented in the Chapter 5 'characteristics of the product'. Last review on 3-12-2018, verified report of HACCP verification, date 3-12-2018. In this report the PRP is reviewed, version 3-12-2018. The necessary prerequisites have been implemented (and documented) to enable safe and legal production.

The HACCP study for reception, sorting and packing and storage of apples and pears and vegetables is reviewed and latest version is 03/12/19. Idem for the flow concerning packing of strawberries, that for expedition of apples and pears and that for transport of fruit and vegetables. Changes made according to the risks in temperature. Two CCP's has changed into CP's, related to temperature intake en temperature storage. All related HACCP study documents have changed according to this, version 03/12/19.

A floor plan is available. Areas are all packed product areas / low risk. Flowcharts verified during the audit were up-to-date (verified e.g. flow of cooling dated 10-12-2018).

All functions are present in the HACCP-multidisciplinary team. The HACCP team leader is agricultural engineer. He is involved in federations, export groups, collaboration with food authorities, and can show up-to-date knowledge and experience. HACCP team meetings verified; 04-1-2020, 4-04-2020, 25/4/20



The 12 steps plan has been followed to make the hazard analysis. Chance and severity have been determined. In chapter 3 of the HACCP manual, reference is made to the Codex Alimentarius.

The HACCP study resulted in no CCP's. The HACCP plan is appropriate for the type of products produced. A matrix is in place with preventive measures, frequency of verification. The following CP's have been determined:

Fast cooling (too slow chilling so ripening process is started - t°)

Storage under ULO regime (spoilage - t° / O2 / CO2)

ULO : t° /CO2/O2 : This follow-up is also done through the computer system. A failure alert is in place on these parameters. The alarm is checked (AB Cool Control in July 2019).

Chemical contamination (LCP – patuline and heavy metals).

Manual manipulations (QCP - contamination by staff, damage of product)

Monitoring activities on temperature control could be demonstrated, seen for the period April 2020.

Temperature (fast) cooling: Cooling cells are controlled with an alarm. Two times per day the temperature is being printed and verified. The alarm is checked (AB Cool Control in July 2019).

A validation / verification meeting was performed 20-12-2019. Flows have been verified during this meeting. There were no changes to be made to the HACCP system, last version 03-12-2019. There have been no FAVV audits since last audit.

There is no subcontracted work and/or rework. No SLA or audits needs to be performed in this. Fruit that is not appropriate (according to UNECE, Class I) for retail/wholesale is sold to the Fruit-juice industry. Fruit that is not suitable as industry fruit (mainly rotten fruit) is removed as bio waste for sustainable solutions.

Details of non-applicable clauses with justification

Clause/Section reference	Justification
/	

3. Food safety and quality management system

3.1 Food safety and quality manual

Main Quality Management System, last verification during the internal audit dd 18/11/19 with department specific work instruction manuals available on the company database and in hard copy. Records kept for min 2 years as a minimum year.

3.2 Document Control

An index of all procedure covered by the Quality Manual is available: "Beleidshandboek - Inhoudsopgave BRC-IFS" version 14-1-20. For the work instructions a separate index is present.

3.3 Record completion and maintenance

Adequate records (both paper and computer) are available and are archived for a relevant time. All records we asked could be easily provided.



3.4 Internal audits

The hazard analysis to define audit scope and frequency has been performed in the management review, where it has been decided that every process needs to be audited once a year.

The audit plan has been updated (2019-1-19): audits are spread throughout the year and is based upon the IFS checklist. Seen reports: Management responsibility dd 12/11/19: Management review first quarter, Food Safety and HR, planning and production, measurements and food defence. The external consultant and the general managers are the auditors, based upon the IFS checklist.

A number of remarks have been made, that have been adequately documented in a central action list. Positive and negative remarks have been recorded in the checklist. Seen for the changing of the organisational chart – removing Quality Assistant.

Factory inspections are being performed monthly. Verified records 2019. An annual infrastructure inspection report is planned. (see 8PR018 dd. 2016-04-14). The latest report is dated 5-9-19 and 12-12-19. No special remarks.

Verified Chapter 20, site hygiene inspection e.g. 4-1-2020, 7-12-2019, 14-11-2019. At random control GMP rounds on e.g. transport, process, storage areas, machines, locations, personal hygiene, cleaning hands, hygiene ULO, site terrain inspections. All records filed and communicated to responsible persons. Results are seen to score from excellent to good.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Raw material suppliers are a local cooperation of growers (1/3) and the Belgian auctions (2/3). Growers are global GAP certified and are enrolled in the system of integrated cultivation techniques.

There is a detailed follow-up of suppliers of fruit, especially for the apples and pears. Weather stations are provided, spraying schemes are made up, there is insect monitoring.

Actions are taken to limit pesticide residue and number. Monitoring programs are in place, residue free pears can be provided (to a certain date).

The raw material hazard assessment has been integrated in the HACCP study. The risk of fraud/substitution has been considered low, as apples come only from local Belgium growers, certified for GlobalGap and are received after harvesting and stored in locked ULO cells. Also the products are processed as whole fruits/vegetables so substitution risks would be detected visually.

Supplier evaluation of all fruit suppliers could be shown. Supplier approval of several suppliers 2019 dated 27-1-2020: subjects experience past year, price, delivery performance, claims, service, quality, general result. Seen for supplier of pears NT (20/1/20). Suppliers of packaging material have also been evaluated.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

All incoming raw materials are checked upon arrival. Procedures and work instructions are in place (e.g. 7 PRO 030 "Ontvangst fruit door externe aankoop", WI PROD 01: "Ontvangst appelen en peren na oogst".

Parameters checked are: Brix, colour, size, shape, peel, freshness, hardness.

3.5.3 Management of suppliers of services

The supplier approval procedure 7 PRO 010 (2018-10-31) also describes management of suppliers of services. Verified e.g. contract with AB Cool maintenance cooling cells and ULO cells (20/1/20), pest controller Cleaning masters (20/1/20) and transporter B (20/1/20) and Argro Trans (20/1/20). Seen list approved suppliers 2019, reviewed on performances and criteria in. It was discussed that the performance of the pest controller had to be monitored more closely and for transport T, cooperation has been stopped



due to price differences.

3.5.4 Management of Out sourced processing

No production outsourced process.

3.6 Specifications

Product descriptions have been made per group of products. More detailed specifications of products are available in the form of European trade specifications. Storage conditions have been documented separately. Seen : specifications of apples, pears, cherries, tomatoes, strawberries. Finished products specifications include criteria against contaminants where applicable (microbiological, allergens). Data sheets provided in company format for finished product specifications. These are reviewed at least every 3 years.

Finished products:

Specific specifications have been agreed with customers. Verified e.g. "Pears Conference" 1 kg, 10 x 1 kg, 12,5 kg, 7 kg, 12 kg.

Packing material:

Tray in pp and punnet in pp: declaration of conformity: dd 04/2018

Coversheets: declaration of conformity: dd 15/11/2019

Bottom: declaration of conformity: dd 21/05/2018

Stickers: declaration of conformity: dd 10/2011

Paper bottom: dd 12/05/2017 for VO 1935/2004

Nets: declaration of conformity: dd 21/12/17

Other specifications (e.g. chemical products):

cleaning agent: Grasset: specification and MSDS (7/11/2017) are also available. Verified list of chemicals.

Specifications are being reviewed during the internal audits. All specifications were up-to-date.

All suppliers of packaging material and supplier of lubricant or chemicals are evaluated 27-1-2020.

3.7 Corrective and preventive actions

There is a central actions list where all corrective and preventive actions are being recorded and followed up. In 2019 in total 3 corrective actions are formulated: one concerning the official warning of the FAVV (2018), one concerning a missing label at end of the packaging line, one concerning the IFS Food Check which demonstrated a closer monitoring of cleaning masters. For 2020 2 corrective actions are formulated: one about a customer complaint wherefor it's investigated with VCBT to perform analysis on the sweet/sour content of fruit and one concerning COVID 19.

3.8 Control of non-conforming product

Products are sorted in function of the different specifications of customers. Products that cannot be used for a customer (because of quality problems) are clearly identified, labelled and quarantined. They are evacuated as industry fruit or as waste (depending on the issue). No hazard for mix up: the recipients are different and are always at the same place near the production line. Products that would be packed incorrectly would be identified according to clear procedures. No examples could be shown. Corrective measures are being taken and documented in case of non-conformities. Products can be realised by the Managing Director, The Production Manager.

3.9 Traceability

There is a clear traceability system for products and packaging materials. Traceability is very detailed and



is in real time. Data can easily be retrieved. Recipients containing products are barcoded on the field and are scanned and traced in production. Packaging material is also labelled and is active as soon as it enters production. It is also scanned when used. Pallets can receive a destination per end customer if necessary. This can be followed-up through the loading order, which is scanned.

Internal traceability test (date 5-08-2019) has been performed, including cleaning data, temperature requirements, pesticide data, customer order, temperature records, purchased at 26-30 may of 2019 strawberries and cherries. Conclusion mass balance strawberries: 116 kg less due to sorting, mass balance cherries: 100%.

Conclusion is recorded and found compliance to the BRC standard, legislation, and with the companies procedure 8 PR008.

During this audit a traceability test has been performed, present products from own grower in cell ulo 11. Sorting order date SO277720, packing date 11-4 until 17 april 2020. 3550 kg was found as non conform and was destined as waste.

Control on labelling: via Gamma the label will be made, before production, on SO277720. Records of checks are available on document, the document is 017, date 11-4-2020, signed by Elina. Feed back on label by client. Two types of label, controlled on date 11-3-2019.

Raw materials (pears) are from Grower NT, global gap certified, valid until: 20/10/20.

Used packing material is trayliners and EPS plastic crates.

Monitorings program is risk based, based on the requirements MRL of the client. Then there is made a selection from the pears, apples and cherries in stock. Verified list of products raw material, of every grower, supplier the product will be analysed. The product is analysed on pesticides LC and GC method, verified sample code AQS, analyses pears date 6-9-2019, complies to the EU legislation 396. Lab is Eurofins, L201. Analyses on heavy metals 2 times a year, verified analyses dd 07/04/2020 – 20/01/20.

The product is Quality Controlled during grading on SO277720. Results are clearly documented in Gamma, e.g. brix is 14,06 (norm 10-15), pressure 5,85 kg/cm2. Refractor meter V303 is calibrated ABcool, date certificate July 2019. Penetrometer is calibrated by ABcool, date July 2019. The product is internal graded on Line 1, Aweta 6 spoor, from grading order SO277720, date 11-4-2020. Product quality is conform the product specification Class I.

Stored in frigo 11 and 12, climate system ABcool controlled, temperature equipment is calibrated by ABcool July 2019 (pre-season). Supplier is reviewed on jan 2020. Alarm test performed ABcool after cleaning cells..

The products were stored, temperature recordings, specification of the bags used for a retailer, certificate of the supplier, product in stock and product sold. Good traceability. Mass balance was found clear, the test took 2 hours.

3.10 Complaint-handling

The corrective action is made by management and complies to the procedure 8. PR 005, version 31-10-2003. No food safety or product quality or product legality complaints last year. In 2020 only one complaint was addressed: balance between sweet and sour wasn't as the client expected. The corrective action is made by management and complies to the procedure 8. PR 005, version 31-10-2003.

3.11 Management of incidents, product withdrawal and product recall

Procedure 8 PR 008 dd 10/12/2019 concerning incident management is in place. The procedure is complete. Different scenarios have been described. It has been clearly identified what constitutes an incident (seen separate list). The list has been completed with security issues. The company also has taken into account the risk of a power break down, which is relevant in Belgium at the moment. The



above mentioned procedure also describes recall of non-conforming products. A recall test has been performed, in combination with the traceability test (see chapter 3.9), date 5/8/2019. As products are only produced upon customer order, all customer data can easily be retrieved. Since the last audit there have not been any recalls.

Details of non-applicable clauses with justification

Clause/Section reference	Justification
3.5.4	No outsourced processes and packing.

4. Site standards

4.1 External standards

The plant is located in an agricultural area that is free from chemical or industrial contaminants. The site is very well maintained and is conforming to the requirements of this standard. External areas are in good order. Drainage is adequate and well maintained. External traffic routes are paved. The site is very well maintained. The facility is maintained to minimise potential for product contamination.

4.2 Site security and food defence

A risk assessment with regards to security measures has been documented in chapter 11 of the manual (Food Defence), dated 20/12/2019. Different measures to prevent access to unauthorised persons are in place: There is a gate, the site is inhabited ("hotel" for foreign employees), doors are protected with a code. Other access points of the building (main entrance) are adequately controlled and a visitor reporting system is in place. Personnel is trained on security measures. The company has installed 19 cameras on critical locations. Attention has been given to potential security risks caused by personnel. Recently the gate used by the drivers is permanently closed. The drivers have to pass by the office before the gate is opened. Cameras are in place: in the office the gate is permanently watched by an employee. The site is registered by the authorities : AER/LIM/002764 - Vestigingsnummer : 2.066.000.030. Verified several challenge tests with mystery guest in practise, to test the measures related to Food Defence on date 25-2-2019. Conclusion is given in MR 4-1-2020.

4.3 Layout, product flow and segregation

The processing halls are designed to process the product in accordance with the relevant legislation. Food safety procedures for employees, visitors, drivers and contractors are implemented to control the risk of product contamination. Segregation of materials, products and personnel is adequate. Only low risk activities. Floor plan is updated after the renovation of the storage building (location of doors has changed). Access, hygiene and other rules are clearly communicated to all entering the company. The necessary actions have been taken to prevent product contamination. All relevant items (e.g. production flow, location of staff facilities including routes, access points, waste) are included in the site plan. Movement of personnel is by simple, logical routes. This is verified during the audit. All areas are low risk. Working space is sufficient and also storage capacity. No temporary constructions were noticed during the audit.



4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

The fabrication of the site, buildings and facilities is suitable for the intended purposes. Walls are concrete with washable plastic covers. Floors are concrete. The walls and the floors are appropriate for this line of activities. The ceilings are in line with the requirements. (Sliding) doors are kept closed. Drainage is adequate. Water is used at the sorting lines, the cherry cooling line and for cleaning. It is adequately analysed (e.g. 24/1/2020 – 21/02/2020 on TPC 22°C, TPC 37°C, E. Coli, Enterococci, Pseudomonas aeruginosa, nitrite). Adequate lighting is provided. The company has started a project to replace all lamps with LED lamps: this is more sustainable and more light is generated. Bulbs and strip lights and electric fly catchers are adequately protected.

NA clauses: In the production areas there are no false ceilings. There are no high-risk or high-care areas on the site. No dust extraction is applicable (no generation of dust).

4.5 Utilities – water, ice, air and other gases

Fresh city water is used for sorting apples and pears, for rinsing and for cooling cherries. Water is stored in a tank and distributed to the points of use. The water plan is dated 24/01/2011. There is well water on site but this is only used in the primary process of growing and harvesting. Water analyses of the storage tank are performed monthly. Analyses (TPC, 22°C, 37°C, E. Coli, Enterococci, Pseudomonas Aeruginosa, and Nitrite) are subcontracted to Lavetan (accredited). Water sampling every month, verified several analyse reports, e.g. 24/1/2020 – 21/02/2020. All results were OK and signed by management. An annual complete trend analysis is performed in behalf of “De Watergroep”. Frequencies have been determined as required by Belgian Law. Ambient air (also used for drying) is not a risk. Compressed air is used to sticker the fruit, very low risk. Verified analysis report on compressed air dated 24-2-2020: L. Monocytogenes, E. Coli, TPC: no issues. Active carbon filters (CO2 scrubbers) are used to adsorb CO and to regulate CO2 (add oxygen) in the ULO cells. Tests of the air tightness of the ULO cells (through over pressure and under pressure) are being performed in 13-9-2019.

4.6 Equipment

Equipment is suitable for the intended purpose. Specifications of all food contact areas, including machine parts, could be demonstrated. Main equipment: conveyor belts.

4.7 Maintenance

There is one internal maintenance employee. An overview of all preventive maintenance is in place. It contains forklifts, trucks, packing installations, cooling cells, trucks, sorting installations. All important tasks are being subcontracted – e.g. : maintenance of cooling equipment has been subcontracted to AB Cool. Pre-operational checks are being performed also to release the installation after maintenance operations. Verified records 2018. Verified preventive maintenance plan 2019, including line 5 Sorma Pears. Verified: validation and test report new packaging line dd 6/1/20. Seen list of lubricants dated 02/02/2013, including identifying consisting allergens. Verified specification of OKS 476 used in production, MSDS dated 29/07/2015. The procedure 7PR026 describes the organisation of corrective maintenance. A form "Melding technische panne" is being used. The workshop is in a completely separated building. Monthly plant inspections are in place. During the audit visit we saw a high maintenance status of buildings and equipment.



4.8 Staff facilities

Staff facilities are suitable for use and are very well maintained. The staff facilities were clean and well equipped. There is an adequate system with designated cleaning personnel. Changing facilities allow direct access. They include hand wash facilities before entering production areas.

There are sufficient locker rooms for personal belongings. Outdoor clothing and other personal items are stored separately from work wear. Hand-washing facilities are sufficient and conform to BRC requirements. Water taps are equipped with hand-free operation and hand-disinfection is in place where appropriate. Toilets are adequately segregated and are equipped as required. Smoking is only allowed outside, in a designated area. The canteen is adequately equipped. Employees are allowed to bring food, except from food containing nuts. This is stated in the company house rules, which are also communicated to the visitors and contractors.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

A chemical control procedure is in place which manages the use, storage and handling of non-food chemicals: Chemical and physical contamination risks are adequately prevented. A good level of implementation was observed during the audit. All cleaning chemicals are stored separately with restricted access to authorised personnel and are properly labelled. MSDS are present for all cleaning agents and all products are suitable for use in a food processing environment. Use of the products is by trained personnel only. All glass and brittle materials present are protected against breakage. A procedure for handling glass and other brittle materials is in place and implemented. A detailed glass/hard plastic register is present. Verified monitoring glass and hard plastic items on daily, weekly and monthly level, depends on level risks to contamination after breakage.

4.9.2 Metal control

All necessary steps are taken to minimise the risk of metal or other foreign body contamination. Sharp objects are being used in a controlled way (little use). Snap-off blade knives are not being used. Staples are present in some packaging material: labels are attached to wooden crates. This is common in the fruit and vegetable industry.

Metal detection is not in place. The risk has been evaluated in the HACCP study. This is acceptable because the final products are unprocessed fruit and vegetables.

4.9.3 Glass, brittle plastic, ceramics and similar materials

All glass and hard plastic is protected and controlled in inspections done by the technical department. Procedure 7 PR 028 describes the scope and frequency; checks are recorded on checklist doc005. Three risk levels have been identified for the glass checklist: daily, weekly, monthly. All records of 2019 - 2020 could be presented. There were no recent problems.

4.9.4 Products packed into glass or other brittle containers

No products are packed into glass or other brittle containers.

4.9.5 Wood

No wood allowed in the production area, only in the packed product areas.

4.9.6 Other physical contaminants



Based on the risk analysis and what is common in this part of the food industry not applicable
4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
All necessary steps are taken to minimise the risk of metal or other foreign body contamination. Visual inspection is in place. Taking into account the nature of the product and the processes, it has been decided that no metal or other foreign body detection is needed. This seems to be a correct evaluation of risks, which is common in the sector.
4.10.2 Filters and sieves
No filters and sieves are used into the process.
4.10.3 Metal detectors and X-ray equipment
Based on the risk analysis and what is common in this part of the food industry metal detection or X-ray is not applicable
4.10.4 Magnets
No magnets are used into the process
4.10.5 Optical sorting equipment
Optical sorting equipment is in use. A sorting machine that removes apples with stains and other defects is in place. It is checked every day.
4.10.6 Container cleanliness – glass jars, cans and other rigid containers
No containers are in use.
4.11 Housekeeping and hygiene
Cleaning plans are in place. Cleaning is done with water and soap. Seen records 2019 :
<ul style="list-style-type: none"> o Hygiene plan ULO cells : weekly (if possible) o Hygiene plan walls warehouse : annually o Hygiene plan packing areas
Specifications are available of products used, e.g. cleaning agent : Grasset : specification and MSDS (7/11/2017) available. Hygiene is verified every day by the Quality Manager - monthly recordings are made. 6 times per year swabs are taken and analysed for TPC by an accredited lab. Seen: reports 2019-2020. Cells, production conveyors, cooling cells and hands are swabbed every six months. Results were all OK. During this audit we could see that hygiene and housekeeping in this company are very efficient. The daily pre-operational inspection is being recorded as planned. Seen : records of 2019-20.
4.11.7 Cleaning in place (CIP)
No cleaning in place.



4.11.8 Environmental monitoring

Verification air: 24/2/20 op Listeria E Coli, TAK 37°C

4.12 Waste

Waste is handled in a good way; it is regularly removed from production. Adequately identified containers are in place. Damaged products are being evacuated as compost. Adequate systems for the collection, collation and disposal of waste material are in place. Segregated waste collection is in place. Waste is removed by licensed contractors: Gielen and Van Gansewinkel.

4.13 Management of surplus food and products for animal feed

No surplus food or products for animal feed.

4.14 Pest management

The most important preventive measure in the company, is keeping doors closed. Adequately closing doors are in place to enable this. A second important action is incoming inspection. This is known and understood by relevant personnel. Pest control is subcontracted to Cleaning Masters. The existing contract covers all areas of the company, and is in place for rodents (6 times per year) as well as for flying insects (2 times per year). There are no toxic baits in production. Baits and EFK are checked. Traces are found occasionally, but mostly outside and mainly in winter. Therefore, it has been decided to do monthly inspections in winter. Inspections verified: 30/1/20 - 28/2/20 – 30/3/20 – 15/5/20..

Products are being identified in the pest control file. Verified specification/MSDS dated 07/05/2014 of e.g Tomcat blocks used outside (6298 B). The last quarterly detailed analysis (trend) was performed 15/5/20 – 30/1/20 – 3/9/19 - 17/6/2019 – 14/10/19 - 30/1/19. All records of the past period have been evaluated. Last determination and analysis of flying insects 15/05/20 – 14/10/2019. No specific remarks. Employees Dimityr Struys, is trained to report pest activity valid.

4.15 Storage facilities

Storage temperature of products generally is 1°C, less for pears. Storage temperature is adequately monitored (see earlier). Records per ULO Coolcel are available of CO2, O2 and temperature - verification if results are staying stable. Data is recorded 5x/h and printed two times per day. Quarterly, the quality of products in the ULO cells is verified manually (through an inspection window).

4.16 Dispatch and transport

Transport is mainly performed by the customers and is occasionally subcontracted. There are three own trucks (with four trailers) that are mainly used for transport to the UK. Temperature requirements during transport are determined in function of the product. Cooled transport is provided. Own trucks are equipped with data loggers. Trucks are verified before loading. A hygiene stamp has been provided.

Own trucks are cleaned weekly, together with cleaning of the loading docks. Verified records 2017-2018. Actions to be taken in case of incidents are clear. Transport companies are mostly contracted by the



customer. If transport is contracted here, a contract with the subcontractor is in place.

- Ekotrax: transport agreement dated 14-1-2020, IFS logistics certified valid till 21/07/2020. Evaluation during management review.

Details of non-applicable clauses with justification

Clause/section reference	Justification
4.4.6	No elevated walkways
4.9.3.4	No packaging of products into glass or other brittle material.
4.10.3	No metal detector or X-ray in use
4.10.4	No magnets in use
4.10.5	No Optical sorting equipment in use
4.10.6	No container cleanliness in use
4.11.7	No CIP installation on location
4.13	No surplus food or products for animal feed
4.15.5	No storage outside.

5. Product control

5.1 Product design/development

In 2019 there were no new products. A new packaging machine has been installed to eliminate plastic cover filming of apples or pears. It has been changed to a cardboard packaging machine. Validation is done – seen report dd 06/01/2020 – Sorma packaging line dd 03/07/2019.

5.2 Product labelling



Product labelling is in line with the legal requirements. Communication with customer regarding complaints is recorded. Pre-printed data are demonstrably approved before printing. One person is responsible for the variable information like GGN and dates. Before printing the labels are checked by at least one other person (quality or sales).

5.3 Management of allergens

There are no products that contain allergens on site. An allergen risk assessment is part of the HACCP study of the company. The necessary procedures are in place to ensure that this remains the case. It is forbidden to bring nuts to the company. This is also stated in the visitor hygiene policy and has been repeated in the yearly training.

5.4 Product authenticity, claims and chain of custody

7 PR 040 dd 24/01/17, last verification: 4/1/20. Risk has been defined as the duplication of vulnerability and severity. It's a 4x 4 matrix. Scores of 5,6 and 7 demand more attention concerning vulnerability.

The country or origin is mentioned on the label, as required by law. The raw material hazard assessment has been integrated in the HACCP study. The risk of fraud/substitution has been considered low. This seems logical because the products are processed as whole fruits/vegetables so this would be detected visually. Verified control on labelling: via Gamma the label will be made, before production, on SO277720. Records of checks are available on document TN, the document is 017, date 11-4-2020, signed by Elina.

Raw materials (pears) are from grower NT, global gap certified, valid till 20-10-2020. Pears free from residue are being produced, but no claim is made on this product.

Non-conformity: there is no link between the work method of the procedure and the VACCP questionnaire.

5.5 Product packaging

Consumer packaging is only applicable for export in Europe. Customer requirements are being respected.

The packaging material used conforms to customer and regulatory requirements. Packaging material is stored in a separate storing area. Some packaging material is provided by the customers.

Packaging materials do not pose a product safety risk. Packaging specifications and certificates of compliance are in place.

Seen :

Tray in pp and punnet in pp: declaration of conformity: dd 04/2018
 Coversheets: declaration of conformity: dd 15/11/2019
 Bottom: declaration of conformity: dd 21/05/2018
 Stickers: declaration of conformity: dd 10/2011
 Paper bottom: dd 12/05/2017 for VO 1935/2004
 Nets: declaration of conformity: dd 21/12/17

Plastic bags supplier A.: CoC dated 07/12/2015, specification dated 18/12/2015 and migration test. Cover sheets supplier W: CoC dated 02/02/2015.

Supplier of carton scales: Declaration of Conformity of supplier LC Packaging, BRC IoP certificated BRC site code 9865026, valid till 21-1-2018. Supplier reviewed on 6-1-2017.



Supplier of film: Declaration of Conformity of supplier Varia Pack, BRC IoP certificated BRC site code 5849086, valid till 10-11-2017. Supplier of label: Declaration of Conformity 20-1-2017 of supplier Label pack, label is tested on 10/2011, food contact statement for adhesive S445N. Supplier reviewed on 6-1-2017.

Storage and handling of packaging materials were found to be adequate. Used packaging material is covered after opening the package or box.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Quality verification of fruit in ULO is done four times per year, a sample is present at small window so the cells mustn't be opened.
 For each lot, samples are taken for shelf life analysis. Documentation on shelf life testing is available.
 For own growers, samples are being analysed upon arrival in the company. Results are being used as input to advise own growers.
 Verified analysis plan 2019 per season.

5.6.2 Laboratory testing

Products are tested for pesticide residue by the company. Accredited laboratories are used for this (e.g. lab Zeeuws Vlaanderen/ Eurofins - primoris). Seen : monitoring report pears/apples season 2019. – sample date of 20/1/20 and 7/4/20.
 Verified e.g. Monitorings program is risk based, of every grower, supplier the product will be analysed conform legality, and client protocols. The product is analysed on pesticides LC and GC method. Analyses on heavy metals 2 times a year: once for apples dd 7/4/20 and once for pears dd 20/1/20.

5.7 Product release

The approval/release procedure is clear and well implemented throughout the company (8 PR 010). There is a one on one inspection of each single product that is packed manually (i.e. all except industry products).

5.8 Pet Food

Not applicable.

Details of non-applicable clauses with justification

Clause/section reference	Justification
5.3.3	No allergens are handled on the site.



5.3.5	No allergens are handled on the site.
5.3.6	No allergens are handled on the site.
5.3.8	No allergens are handled on the site.
5.4.5	No claim about the method of production.
5.5.2	No product liners and bags for intermediate products.
5.6.2.2	No laboratory on location

6. Process control

6.1 Control of operations

Production lines have been clearly identified. Line 1 (water sorting line), line 3 (flowpack - 500 g, kg, ...), line 2 (netpack), line 4 (bags), line 5 (check-weigher).

The process for apples and pears: reception, precooling, cooling, ULO storage, water transport, sorting, drying, calibrating, packing. Production (packing) is planned in function of customer demand.

In the harvesting season, products are picked up regularly to be able to cool them as soon as possible. Products are discharged, scanned, pre-cooled to 3 to 4°C during 24h in different cooling cells, quality controlled (in September : hardness, sugar, colour) and sorted to different storage cells (<1% oxygen) in function of their destination.

Since 2014 there is also a cooling process for cherries: cooling is done with water of about 2°C for 10-12 minutes. Sorting and packing of cherries and strawberries is done in the cooling cell to not rupture the cold chain. Each cooling cell is provided with an active carbon filter to filter the air that is poor in oxygen. For ULO : temperature, CO2 and O2 are continually measured and monitored. From the first storage, there is a bimonthly quality check per crop.

A daily production meeting is in place. In function of orders, it is decided to open a storage cell. Sorting orders tell personnel which sizes have to be sorted for which packaging. Specific instructions are in place for the different tasks in production. A pre-operational check is being performed and documented to release the production lines.

6.2 Labelling and pack control

Product in crates is weighed during packing.

Weighing equipment is calibrated annually (external calibration) and monthly by own personnel. There is a daily verification before start-up. A check weigher is in place on the manual packing line where products are counted. Manual weighing equipment is also in place. The software from the packaging line for pears has been improved since a customer complaint.

Apples and pears are sorted per calibre. A certain calibre guarantees a certain weight. If the weight is not OK, calibres are adjusted.

Calibrated weighing equipment is being used. Verified calibration records: 07/02/20 – 20/02/20



Verified: Control on labelling: via Gamma the label will be made, before production. Records of checks are available on document 017. Date 11-4-2019, signed by Elina..
Raw materials (pears) are from grower TN, certified global gap, valid until 20/10/2020.

Verification of the traceability of packaging material:

Supplier of punnets INFIA: Declaration of Conformity of supplier INFIA, BRC IoP certificated BRC site code 8013558, valid till 10-11-2020. Supplier reviewed on januari 20.

Supplier of film: PolyProp, C30, rol 6, produced 13-6-2017, Declaration of Conformity of supplier Varia Pack, BRC IoP certificated BRC site code 5849086, valid till 10-11-20. Supplier reviewed on januari 20.

Supplier of label: Declaration of Conformity 20-1-2017 of supplier Label pack, label is tested on 10/2011, food contact statement for adhesive S445N. Supplier reviewed on januari 20.

The product is Quality Controled during grading on SO23008, 11-4-2020. Results are clearly documented in Gamma, e.g. brix is (norm 10-15), pressure, refractor meter V303 is kalibrated ABcool. Penetrometer is calibrated by ABcool. The product is internal graded on Line 1, from grading order SO2777002, date 11-4-20. Product quality is conform the product specification Class I.

Procedure for packing and labelling is controlled by software system. Standard packaging material is in use. Products are packed into crates, foil and carton. Labels are printed out of the system, only one time (at start) the lot code must filled in. all other information is already into the system.

The pre-operational inspection form has been adapted and communicated and trained to the sorting responsible. All checks pre and during sorting operations must be performed according the customer specifications and stated on the form 17 and correlated on doc 082 (pre-operational inspection)- one document for each line. Document 017 for managing labels and customer specifications is adapted to the points that the line responsible has to register his/her intermediate checks. The correlations between these two documents is made on SO level and production date through the Gamma Global ERP system. The intermediaries checks (during) - and post (clear away old labels) production will be registered on doc 17 to. The customer specifications checks are contained also on this document 17. This checking's were executed bud not precepted that way before. This document 17 is correlated to the SO lot number. Document 082 is adapted for the correlation checks with doc 17 to make sure that customer specifications are in place. Document 082 is correlated to the production date. The intercorrelation ship of the 2 documents gives a two dimension confidence to insure Customer labels and specifications are fully executed as required.

6.3 Quantity, weight, volume and number control

Packed to minimum weight only. Every packaging is weight during production. The scale is linked with the system.

The product is Quality Controled during grading on SO277720, 11-4-2019. Results are clearly documented in Gamma, e.g. brix, pressure, penetrometer.

6.4 Calibration and control of measuring and monitoring devices

An inventory of measuring equipment is in place. The list mentions place of use / user of the equipment. Seen calibration of temperature probes: Stored in ULO 11, climate system ABcool controlled, temperature equipment is calibrated by ABcool from July 2019(low season). Supplier is reviewed on January 2020017, pressure test date Septembre 2019. Alarm testperformed ABcool after cleaning ULO11.

Refractometer, Penetrometer and Oxygen and CO2-meter have also been calibrated as planned. Refractometer V303 is kalibrated ABcool, date certificate July 2019. Penetrometer is calibrated by ABcool, date July 2019. W48, dated 07/02/20 (rowetech). Thermometers of quality controllers: 09/12/19.

Non-conformity: the oven for rodac plates isn't included in the calibration scheme.



Details of non-applicable clauses with justification

Clause/section reference	Justification
6.2.3	No labels for consumers.

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

A plan for training has been approved by the CEO dd 10/1/20. Training of new personnel and refresher trainings are being given by management, as always. Management G.D. has been trained in the new version 8 of the BRC Food Standard. A signed copy has been distributed and the policy has been reminded to all personnel in the last training and 3-2-2020, general training HACCP. Effectiveness of meeting is monitored, immediately after the training by means of an oral examination, procedure monitoring effectiveness of training according to Procedure 6.PR003, date 31-10-2003. Conclusion is reported in MR.

Verified Training records of Ali Ferdun, Mustafa Sequn, Ismael Gynyar, Osman Tughov, Veli Nezife
 Verified training content traffic date 03-02-2020, duration 2 hours.

In the general HACCP training, the following content: Food defence, allergens, food safety culture, cleaning, CP's temperature control. Verified list of trainees.

Training related to production (label, orders, QC) are trained on the job. In MR is concluded the training is effective. A knowledge matrix is made for all relevant tasks. The knowledge matrix has been updated on in the Manage review. New people received one day training, also given by management. Due to covid 19, the company had to source local people to perform the packaging orders. These people received also a training before commencing. Records assessed during the audit.

Team leaders are Polish or Romanian, but speak Dutch or English very well. Communication is not a problem. Training is given in collaboration with the production supervisors.

Training documents and general information (e.g. on incident control) are hanging out in the canteen.

Allergen awareness is part of the refresher training. In the visitor policy it is also stated that nuts are forbidden in the company.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Personal hygiene rules are documented in the House rules which have been updated 05/01/2014. House rules are hanging out in relevant areas. During this audit we could see that they are respected. Hand swabs are being taken, results are always OK (see internal audits). Hands are also visually inspected. Verified records 2016. First aid procedures are in place. Personal medicines are not allowed in the production area.



7.3 Medical screening

Medical screening is performed annually. A follow-up list is made separately for the own personnel and for the polish workers. New personnel starts only after having received a HACCP training in his own language (with test) and a medical exam. Visitors have to declare that they do not suffer from disease before entering the production area.

7.4 Protective clothing: employees or visitors to production areas

Clothing conforms to the requirements of this standard. Hairnets are generally worn perfectly. Coats are being removed before eating or going to the toilet. Single use gloves are used when manipulating naked product. Washing of company clothing is performed in-company. Clothes are washed above 65°C.

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones

8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones

No high-risk, no high-care nor ambient high-care production risk zone

8.2 Building fabric in high-risk and high-care zones

No high-risk, no high-care nor ambient high-care production risk zone

8.3 Maintenance in high-risk and high-care zones

No high-risk, no high-care nor ambient high-care production risk zone

8.4 Staff facilities for high-risk and high-care zones

No high-risk, no high-care nor ambient high-care production risk zone

8.5 Housekeeping and hygiene in the high-risk high-care zones

No high-risk, no high-care nor ambient high-care production risk zone

8.6 Waste/Waste disposal in high risk, high care zones

No high-risk, no high-care nor ambient high-care production risk zone

8.7 Protective clothing in the high-risk high-care zones

No high-risk, no high-care nor ambient high-care production risk zone



Details of non-applicable clauses with justification

Clause/section reference	Justification
All	No high-risk, no high-care nor ambient high-care production risk zone

