

**Audit Report Global Standard Food Safety Issue 9**

1. Audit Summary			
Company name	Explotaciones Agrícolas Samper S.C.L.	Site code	1408717
Site name	Explotaciones Agrícolas Samper S.C.L.		
Scope of audit	Sorting, washing (optional only for melon) grading and packing of leafy vegetables (eg. lettuce) in cardboard or plastic box, flow pack, plastic and cardboard trays; fruiting vegetables inedible peel (eg. melon) in cardboard, wooden or plastic boxes, with wooden chips, or cardboard tray liners; and fruiting vegetables (eg. pepper) in plastic bag, cardboard or plastic box, flow pack with cardboard or plastic trays. Selección, lavado opcional solo en melón, clasificación y envasado de lechuga en cajas de cartón o plástico, o flow pack y bandeja de plástico o cartón; de melón en cajas de cartón, madera o plástico, con viruta de madera, o con alveolos de cartón; y de pimienta en bolsa de plástico, cajas de cartón o de plástico, y en bandeja de cartón o plástico con flow pack.		
Exclusions from scope	None. Ninguna		
Justification for exclusion	None		
Audit start date	2026-01-26	Audit finish date	2026-01-28
Re-audit due date	2027-03-01	Head office	No

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

2. Audit Results					
Audit result	Certificated	Audit grade	A+	Audit programme	Unannounced – mandatory 1 in 3 years
Previous audit grade	A		Previous audit date	2025-02-05	
Certificate issue date	2026-02-25		Certificate expiry date	2027-04-12	

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2. Audit Results		
Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

3. Company Details			
Site address	Finca Lo Mazón s/n , Gea y Truyols, Murcia 30590		
Country	Spain	Site telephone number	34 968370309
Commercial representative name	José Luis Samper	Email	samper.joseluis@gmail.com
Technical representative name	José Luis Samper	Email	samper.joseluis@gmail.com

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3
Shift pattern	One shift (10:00-13:00; 15:00-20:00) 5 or 6 days a week depending on the season				
Seasonal site	No				
Seasonal opening times (Start/end date)	NA		NA		
Other certificates held	IFS Food, GlobalG.A.P. F&V, GRASP.				
Outsourced processes	No				
Outsourced process description	NA				

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**4. Company Profile**

Regions exported to	Europe
Company registration number	21.13243/MU
Major changes since last BRCGS audit	No investment last year

**Company Description**

Private and family company created in 2007. Important part of the production comes from the own farm, which is GLOBALG.A.P certified. (04-07-2025, GGN 4056XXXXX5196, broccoli, melon, pepper, lettuce, lemon) and purchase from Spanish farmers, Brazil (melon), Morocco (pepper), all GLOBALG.A.P. certified. The production of lemon and broccoli are sold from field – there is also olives on the farm, not under the GLOBLAG.A.P. certification, sold to olive oil producer. Lemon, broccoli and olives are not managed on the site. Plant constructed in 1995. New investment: No investment last year, some task for general maintenance. There is 1 line for each product (pepper, melon, lettuce). There is a line for citrus fruit, not used. The process is: sorting, grading, packing, pre-cooling (except melon). An optional washing can be performed for melon, but the company declares that washing has not been performed in the last three years. In case of imported melon from Brazil, the melon is purchased already calibrated, so the process is only sorting and repacking. No trading of products already processed. No Exclusions. No recall or withdrawal in last season. No outsourced process. Other site: there is an office in El Pilar (company declares it is only an office). The contact in case of emergency is José Luis Samper; 619117650, samper.joseluis@gmail.com. 31 operators, in one shift (10:00-13:00 // 15:00-20:00),31 employees (5 own employees all year and the other permanent discontinuous). The site is working is all year. The area is 10.000 m2 of which 2.800 m2 covered. Using the logo in invoice.Web site: www.kaine.es Schemes certified: BRCGS, IFS, GLOBALG.A.P., GRASP. In 2025, 6.233 mil Kg melon, 18,182 mill units lettuce, 56.789 Kg pepper were handling. 60% is exported to EU countries (France, Germany, Switzerland, Denmark) and UK. 40% is sold in Spain. 20% retailers brand (supermarket and intermediaries), 80% own brands: Kaine, El secreto de mi tierra, Mazonpil. Sanitary registration number: 21.13243/MU. Last sanitary inspection N°11490 17-06-2020. No sanctions

**5. Product Characteristics**

Product categories	05 - Fruits, vegetables and nuts
Finished product safety rationale	Low microbiological risk, whole fresh produce. Storage in chilled temperature for quality reason (<10°C). Short shelf life 20 days, pH: 7 (lettuce).



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**5. Product Characteristics**

High care	No	High risk	No	Ambient high care	No
Justification for area		Low risk as per BRCGS Food Appendix 2, whole fresh produce which does not support pathogenic growth under normal conditions.			
Allergens handled on site		None			
Product claims made e.g. IP, organic		GLOBALG.A.P. GGN			
Product recalls in last 12 months		No			
Products in production at the time of the audit		Lettuce flowpack.			

**6. Audit Duration Details**

Total audit duration	18 man hours	Duration of production facility inspection	9 man hours
Reasons for deviation from typical or expected audit duration	Combined with another GFSI - audit total time: 2.5 days.		
Combined audits	IFS		
Next audit type selected	Announced		

**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)

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Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
Jose Luis Samper	General manager	On-site			On-site
Jose Maria Buendia	Technical quality	On-site	On-site	On-site	On-site
Encarna García	Cleaning staff		On-site		
Josefa Villaescusa	Quality control		On-site		

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
03 FEB 2025	BRCGS Food Safety	Announced	PASS
28 FEB 2024	BRCGS Food Safety	Announced	PASS
21 FEB 2023	BRCGS Food Safety	Unannounced	PASS

Document control			
CB Report number	4469956 - C0739390		
Template name	F908 Food Safety Audit Report Template		
Standard issue	9	Template issue date	2022-12-16
Directory allocation	Food	Version	1.1



### Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
Clause	Detail	Critical or Major	Re-audit date

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1.1.2	A food safety culture plan MA-10 dated 15-07-2019 and updated on 02-01-2026 is implemented; however,	Indicators for the objectives are defined for monitoring within the Culture plan. Se definen indicadores de los objetivos para realizar su	Monitoring objectives based on defined indicators is a fixed item in monthly meetings. Se pone como punto fijo en	Monitoring has been based on objective assessments of the plan due to the lack of a defined mechanism for	2026-02-23	MNAVARRO

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Minor						
	no evidence of measurement or evaluation of the implementation of the culture plan is available. La empresa ha implantado un plan de cultura de seguridad alimentaria MA-10 de fecha 15-07-2019 actualizado el 02-01-2026; sin embargo, no se dispone de evidencia de medición o evaluación de la implantación del plan de cultura.	seguimiento en el plan de Cultura.	las reuniones mensuales realizar seguimiento de objetivos en base a indicadores definidos.	monitoring using indicators. Se ha venido haciendo un seguimiento basado en apreciaciones objetivas del plan por no tener el mecanismo definido para hacer seguimiento por indicadores.		
2.5.1	The melon process flow diagram dated 15-09-2025 does not include the melon washing step as an optional stage. El diagrama de flujo de melón de fecha 15-09-2025 no incluye la etapa de lavado de melón como etapa opcional.	The flowchart is being revised to clearly separate all phases and avoid confusion. Se cambia el diagrama de flujo separando bien todas las fases para que no haya confusión.	Training is being provided to the quality manager on creating flowcharts and preventing confusion. Se imparte formación al responsable de calidad sobre elaboración de diagramas de flujo y evitar confusiones.	The washing stage is shown in the flowchart alongside other phases (such as the brushing stage, which is always performed), leading to confusion about which phases are optional and which are not. La etapa de lavado está en Diagrama de flujo junto a otras fases (como la de	2026-02-23	MNAVARRO



Minor						
				cepillado que se hace siempre) lo que da lugar a confusión sobre cual es opcional y cual no.		
3.5.1.1	Packaging material specifications are reviewed at a maximum frequency of three years; however, the technical specification for Flow pack PP 30 microns shows the last review dated January 2021. La empresa dispone de fichas de especificación de material de envasado con una revisión máxima de tres años; sin embargo, la ficha técnica de Flow pack PP 30 micras presenta la última revisión en enero de 2021.	The supplier was asked to provide updated technical data sheets. Se solicita al proveedor las fichas técnicas actualizadas.	The quality manager received training on this requirement of the reference standards. The supplier approval procedure was updated to include the mandatory updating of material data sheets. Se imparte formación al responsable de calidad sobre este requisito de las normas de referencia. Se actualiza el procedimiento de homologación de proveedores incluyendo obligatoriedad de actualización de fichas técnicas de materiales.	The supplier approval procedure was followed as described, based on the quality manager's interpretation of these regulatory requirements. Se ha procedido tal como está descrito en el procedimiento de homologación de proveedores tal como ha interpretado el responsable de calidad estos requisitos normativos.	2026-02-23	MNAVARRO
4.7.1	The preventive maintenance plan APPCC.PL.03 Rev4 dated 04-03-2024	Unused machinery is removed from the maintenance plan. Se elimina la maquinaria que no	Training is provided to the quality manager to ensure the documents are up-to-date with	These items had not been removed from the maintenance plan in case they were used again. No	2026-02-23	MNAVARRO

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Minor						
	includes citrus calibrator and citrus packaging machine equipment which are currently not in use. This is a documental deviation. El plan de mantenimiento preventivo APPCC.PL.03 Rev4 de fecha 04-03-2024 incluye el calibrador de cítricos y la máquina envasadora de cítricos, maquinaria que actualmente no se utiliza. Es una desviación documental	se usa del plan de mantenimiento.	current conditions. Se imparte formacion al responsable de calidad para que tenga actualizados los documentos con la realidad.	se habian eliminado estos elementos del plan de mantenimiento por si se volvian a utilizar.		
4.7.5	Ice accumulation was observed on the condenser of the finished product cold room; no product risk was identified as no product was stored underneath. Se evidenció acumulación de hielo en el condensador de la	The ice accumulation is removed. Se quita la acumulacion de hielo.	The maintenance plan includes inspection of the unit and checking for ice accumulation. Se incluye en el plan de mantenimiento la revision del aparato y comprobacion de acumulacion de hielo.	The ice was caused by condensation and freezing of moisture from the air entering the chamber, resulting from frequent opening of the cold storage door (this is the finished product cold storage chamber, and it is necessary to move the finished pallets through	2026-02-23	MNAVARRO



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Minor							
	cámara de producto final; no se evidenció riesgo para el producto ya que no había producto almacenado debajo.				it). El hielo se ha producido por condensación y congelación de humedad del aire que entra al interior causado por aperturas frecuentes de la puerta de la cámara (se trata de la cámara de producto final y es necesario ir pasando los palets terminados).		
4.11.1	In general, facilities were in adequate cleaning conditions; however, a spider web was observed on the ceiling of the auxiliary material warehouse. En general, las instalaciones se encontraban en adecuadas condiciones de limpieza; sin embargo, se evidenció una telaraña en el techo del almacén de material auxiliar.	The pallets were moved, and the ceiling of the auxiliary materials storage area was cleaned. Se separan los palets y se limpia el techo del almacén de material auxiliar.	The monthly inspection verifies that the pallets are separated from the wall and that the cleaning plan is being followed. Se controla mediante la inspeccion mensual que los palets estén separados de la pared y que se cumple el plan de limpieza.	The packaging pallets were not sufficiently separated from the wall, and the cleaning supervisor could not access them. Los palets de envase no se encontraban lo suficientemente separados de la pared y la responsable de limpieza no ha podido acceder.	2026-02-23	MNAVARRO	

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Minor						
4.14.6	An insect light trap was observed switched off in the loading dock area. Se evidenció un insectocaptor apagado en la zona del muelle de carga.	The appliance was moved from the outlet that wasn't receiving power to another outlet so that it would receive power and remain on. Se cambia el aparato del enchufe al cual no le llegaba electricidad a otro para que le llegue electricidad y quede encendido.	The insect light traps are checked monthly to ensure they are functioning correctly. Se controla mediante la inspeccion mensual que los tubos de los insectocaptos se encuentran funcionando.	The lights have been inspected and found to be in perfect condition (the pest control company responsible replaced them on October 2025). After changing the plug and seeing that it worked, it was concluded that the problem was electrical. Se han revisado los tubos comprobandose que están en perfecto estado (la empresa de plagas que es responsable los cambió en Octubre del 25) y al cambiar el enchufe y ver que funciona, se concluye que es un fallo eléctrico.	2026-02-23	MNAVARRO
4.15.1	Pallets were observed stored directly against the wall in the auxiliary material warehouse. Se evidenciaron palets almacenados junto a la	The pallets will be kept away from the wall. Training will be provided to the warehouse manager to ensure the pallets remain separated. Se separaran los palets de la pared. Se imparte formacion	Monthly inspections will verify that the pallets remain separated from the wall. Se controla mediante la inspeccion mensual que los palets	This indicates a lack of awareness on the part of the warehouse manager regarding this requirement of the standard. Se trata de desconocimiento por	2026-02-23	MNAVARRO

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Minor						
	pared en el almacén de material auxiliar.	al responsable de almacén para que los palets permanezcan separados.	queden separados de la pared.	parte del responsable de almacén sobre este requisito de la norma.		
7.4.3	The hygiene rules for workers MA-02 V8 dated 01-02-2024 do not define how employees must bring their self-laundered uniforms to the facility in order to prevent contamination. Las normas de higiene para los trabajadores MA-02 V8 de fecha 01-02-2024 no definen cómo deben traer los trabajadores a las instalaciones el uniforme lavado por ellos, con el fin de prevenir riesgos de contaminación.	The hygiene regulations are being modified to include how workers should wear their uniforms. Se modifican las normas de higiene incluyendo como deben traer el uniforme los trabajadores.	Training is being provided to the quality manager on the content of the hygiene regulations. Se imparte formación al responsable de calidad sobre contenido de las normas de higiene.	It had not been considered necessary to include it in the hygiene regulations since it was described in a laundry instruction provided during training. No se había considerado necesario incluirlo en las normas de higiene ya que estaba descrito en una instrucción de lavado de ropa que se imparte en formación.	2026-02-23	MNAVARRO

Comments on non-conformities
None



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Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

**Audit team**

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Lead auditor		
Auditor number	First name	Second name
20196	Mar	Navarro Sarabia

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor Number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
Mar	Navarro	20196	Lead auditor	2026/01/26	09:00	17:30	Physical	
Mar	Navarro	20196	Lead auditor	2026/01/27	09:00	17:30	Physical	
Mar	Navarro	20196	Lead auditor	2026/01/28	09:00	13:00	Physical	

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**Detailed Audit Report**

**1. Senior management commitment**

The site's food safety & quality policy is signed by JLS the General manager dated on 2019-01-02 and is communicated to staff by training session and bulletin board at entrance. The policy includes the site's obligation to produce safe, legal, authentic, quality product and also its commitment to continually improve. Senior Management has defined a clear food safety and quality culture plan MA-10 dated 2019-07-15 updated on 2026-01-02. The level of site culture is identified by Sr. JLS through monthly meeting. The plan's defined activities are designed around communication, training, feedback from employees, and behaviors to maintain and improve the product safety process. Activities include: training session, job performance evaluation, rewards... The success of the food safety culture plan is measured by site checks, internal audit and interview by quality manager, and the timescales for completion are defined. The food safety culture plan is reviewed based on activity, weekly, monthly, quarterly and everything is reviewed on an annual basis. The last review was completed on 2025-01-31 on annual meeting. The site has defined and documented clear objectives to maintain and improve the safety, authenticity, legality and quality of products. The objectives and their targets for this campaign are set on 2025-01-31: Pesticide test on lettuce without residues, at least 50%. Complaints <8. -Authenticity varietal control. These objectives are monitored by general and quality manager on an annually basis. Last season surveillance (2024) only one achieve. Review meetings are held with senior management on a 2025-01-31, annually basis to evaluate site performance against the Standard and the objectives. The meeting is documented and includes the requirements of the Food Safety Standard clause. The date of the last management meeting was 2025-01-31 and was attended by general manager JLS, quality manager JMB, administration NCL, external assessor FNS. The minutes of the meeting are recorded in the document (pre-requisites, Internal and external audits, culture plan, training plan, food defense, authenticity, RASFF...) and actions for improvement are communicated to all staff by internal meeting. The site has a demonstrable meeting program to enable food safety, authenticity, legality and quality issues to be brought to general manager's attention. The meetings are held monthly. Meetings and discussions are recorded/documented on monthly meeting. Auditor verified meeting minutes dated: 2025-12-31 // 2025-11-28 (includes reviewed objectives) // 2025-10-31. The site has a confidential reporting system in place. It includes suggestion box and anonymous phone number. The site has had 0 reports in the last 12 months only internal interview with workers. The method or system in place to keep informed and to review scientific and technical developments, industry codes of practice, new risks to authenticity of materials, and relevant legislation is: external assessor and web site as AECOSAN. Law list PGC02.RC03 updated on 2026-01-08. The general manager participated in the opening and present in the closing meeting. Members of the senior team were available during the audit to discuss the effective implementation of the food safety and quality culture plan, and department managers were available when needed. Standard Logo is used on invoice in correct manner. The 6 NCs raised on the previous audit had all been effectively closed out. Root causes for the previous non-conformities were identified and preventive actions were implemented. The site maintains required legislative registrations with: AESAN, 2113243-MU. This audit was carried out without prior notification and the auditor was on the factory floor within 30 minutes of arrival on the site. See minor NC 1.1.2: A food safety culture plan MA-10 dated 15-07-2019 and updated on 02-01-2026 is implemented; however, no evidence of measurement or evaluation of the implementation of the culture plan is available. La empresa ha implantado un plan de cultura de seguridad alimentaria MA-10 de fecha 15-07-2019 actualizado el 02-01-2026; sin embargo, no se dispone de evidencia de medición o evaluación de la implantación del plan de cultura. There is a current organization chart last (HACCP manual Rev.23 point 2) updated 2024-10-15 that clearly defines responsibilities of management to ensure effective implementation of the food safety and quality management system as well as deputies in the absence of key members: General Manager JLS Quality manager JLS Quality aux. JMB General manager alternate: MASA External assessor: FNS Production manager JMB Quality control JVC Label manager: FMAJ Maintenance staff: JGF Cleaning staff: SR. Employees are aware of their responsibilities through training session and signed their job card. Employees interviewed demonstrated that work is carried out in

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accordance with documented site policies, procedures, and work instructions. Job description: PGC14.RC01 updated on 2023-03-07. Check for: - JVC as quality control 2023-10-16 – EGP as cleaning responsible signed on 2025-01-10. - JGF: signed on 2025-01-10. -MFA as label control signed on 2025-01-10. Employees also are aware of the need to report food safety and quality risks and non-conforming product to management. They report it directly to production manager. The site does use external expertise (external consultants) but day-to-day management of the food safety and QMS systems are the responsibility of the company/site by production manager and quality manager.

**Details of non-applicable clauses with justification**

Clause/Section Ref	Justification

**2. The Food Safety Plan – HACCP**

The HACCP team consists of 4 members and is led by JLS as general manager who has the following training: - Agricultural technical engineer. - Internal HACCP training on 2026-01-15 by external assessor. Other team members' training includes: - General manager (Team leader) JLS. - Admin. NCL - Production manager JMB - External assessor FNS. Ag. Tech. Ing. on 2010, HACCP training on Dec. 2011. 2024-02-05 HACCP training for all team by FNS, 8 H. HACCP in line Codex updated on Rev.25. 2025-01-10. The scope covers all the products and processes that are manufactured at this site summarized as follows: melon, lettuce and pepper. The Prerequisite programs (PRPs) detailed in the plan include programs such were appropriate for the facility and process types. Pre-requisites are documented in point 7 and include: Water control. Cleaning and Disinfection. Pest management. Maintenance Programmes for equipment & buildings. Personal hygiene requirements. Waste management Allergens management Staff training Supplier approval & purchasing. Flow diagram(s) are on file that included receipt of raw materials, packaging, storage and all relevant process steps. Significant process steps include: Melon: incoming, storage, dumper, brushing, optional washing, grading, packaging, storage (8-10°C) and expedition Pepper: incoming, storage, dumper, grading, packaging, storage (6-8°C) and expedition. Lettuce: incoming, storage, dumper, optional washing, grading, packaging, storage (3-5°C) and expedition. The accuracy of the flow diagram(s) is reviewed on an annual basis or when changes occur. The last review was by HACCP team completed on: Melon on 2025-09-15. Lettuce: 2025-09-22 Pepper on 2025-07-28. During the inspection, auditor confirmed that the process flow did accurately reflect the production process for lettuce and pepper. Product descriptions and information sources used to conduct the hazard analysis were available for review on point 9 into the HACCP. Melon: origin: Spain and Brazil pH 5,7-7,2 T<sup>a</sup> 8-10°C shelf life 20 days. °Brix 10-11. Pepper: origin: Spain and Morocco 6-8°C 10 days. Lettuce: Romana 3-5°C 15 days. and little gem. The intended use of the product is fresh consumption. The hazards identified in the study included: microbiological (detailed), physical (screws, jewellery), chemical (grease, cleaning product...), radiological, fraud, malicious contamination and allergens. The actual hazard analysis has considered the likelihood of occurrence, no detection and severity for each identified hazard to determine if it was significant. If the hazard is controlled by a current PRP or PC (preventive control), it is listed in the study and the PRP/PC is validated. >300 point identify as CP in this case used the decision tree. An example: List hazards controlled by PRP: cleaning product PC: chemical contamination by: pesticide There are no CCPs identified Verification and validation procedures for the entire HACCP or Food Safety Plan included a review of: annual meeting and internal audit .The last verification/validation was completed by general manager on 2025-01-31 and documented on annual meeting and internal audit 2025-01-

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CB Report No. 4469956 - C0739390

Auditor: Mar Navarro Sarabia



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31. Documentation and record keeping are sufficient to enable the site to verify that the HACCP and food safety controls, including controls managed by prerequisite programs, are in place and maintained. The HACCP or food safety team reviewed the entire HACCP or Food Safety plan including prerequisites or preventive controls on annual meeting. The plan also is reviewed when changes occur to raw material, suppliers of raw material, equipment, recipes, processing or processing conditions, emergence of a new risk, etc. Documentation and record keeping observed to be satisfactory during the site inspection and as part of the traceability test. See minor NC 2.5.1.: The melon process flow diagram dated 15-09-2025 does not include the melon washing step as an optional stage. El diagrama de flujo de melón de fecha 15-09-2025 no incluye la etapa de lavado de melón como etapa opcional.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
2.9.1	No CCP's have been identified.
2.9.2	No CCP's have been identified.
2.10.1	No CCP's have been identified.
2.10.2	No CCP's have been identified.



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**3. Food safety and quality management system**

**3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance**

The company have a mature quality system in place based on the BRCGS V9 requirements. A quality manual MC V.2 2014-02-04 is available in the Technical Managers office and available to all staff via the shared server. Food Safety and Quality manual appears to be fully implemented and relevant work instructions are available to all staff. All procedures and work instructions were clearly legible and available in Spanish and appeared to be understood by all relevant staff. The document control procedure (PGC01. V.0 2011-08-01) includes a list of controlled documents as well as the process for identification, version control, authorization, amendments and system to replace the former copy. List updated on PGC02.RC01. Edc.7. 2026-01-15. The system for electronic control of policies, procedures and work instructions includes: password protection / read only access (google drive). Electronic documents/procedures are backed up weekly to prevent loss. The following documents were cross checked in this audit: - E.g. Cleaning Plan PL.01, V9. 2025-02-18, handling area. They were all found to be the correct version. A record of the reason for change is retained, e.g. PGC02 V3. 2020-04-13. included external docs. The process for management of records is covered in PGC01. V.0 2011-08-01. Electronic records are stored securely, backed up, have limited/authorized access, and control of amendments by quality manager or production manager, and are password protected. Traza software visionfruit. The retention period for records is 5 years, based on quality office. The shelf life of products under the scope of this audit is 20 days. Records reviewed during this audit were all found to be in good order. All records reviewed during site inspection were current versions.

**3.4 Internal audits**

There is a schedule of internal audits of the Food Safety and Quality Management Systems that included, HACCP/Food Safety Plan, PRPs, Food Defense, Fraud and the written procedures to implement the Standard. The schedule is detailed in procedure PGC13. V.1 2019-01-02 and the plan PGC13.PL01 V0. 2024-03-01. Audits are scheduled throughout the year on at least four different dates. (April, July, October and January) Auditor reviewed internal audit records dated: - 2025-04-14(3-6) - 2025-07-16 (1-4) 1 minor NCs (4.5.2)- 2025-10-16 (2-5-7) - 2026-01-08&09 (all BRCGS chapter and IFS V8.) 3 NCs (3.11.3, 6.4.1, 6.4.2). The frequency at which each activity is audited is based on the risk associated with the activity and/or results from previous audits, as detailed in PGC13.RC02. V2 2021-02-26 updated on 2025-03-01. Each of the listed audits has a scope for the program being audited. There are 1 trained and competent auditor who are independent from the program being audited summarized as follows: - MAGF (external assessor), Ag. Tech. Ing. 2007, internal auditor training on 2012, BRCGS V9, 2023-01-16 by Kiwa and IFS V8 with Kiwa on 2024-01-23. These audit reports identified conformity, nonconformity and objective evidence of the findings. Results are reported to the responsible personnel by quality. Correctives and Preventives are managed through the site's CAR program PGC10.RC01 Edc.1, 2022-02-18 and corrective/preventive actions and the timescales of completion have been agreed and their completion verified. Closed check for: BRCGS 6.4.1 IFS 5.4.1., detailed: The metrological verification of quality control scale has not been available. Root cause analysis: Lack of knowledge of quality manager regarding of requirements for scale of quality control. Immediate action: A new scale with metrological control is purchased. Corrective: Training to quality manager. Closed verify on 2026-01-15 by internal auditor. Auditor verified that the corrective actions were reviewed in the management review meeting on meeting minutes dated 2025-01-31. There is an inspection program based on risk for hygiene/sanitation standards, building and equipment condition. The inspections are completed on a monthly basis. Results are recorded on PGC13.RC.01, V6, 2024-09-30, example. 2025-10-31. and the site use this inspection to check the job performance: training, cleaning staff to HA (Handler) by external assessor. Correctives actions and timescales for implantation are agreed and corrections in the case, not at the moment.



3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

PGC04. V14. 2025-02-09. packaging material and service. PGC05. V14, 2025-02-09. raw material. The company has a documented raw material & packaging risk assessment by (individual material or group) to identify potential risks to product safety, legality and quality. The risk assessment includes consideration of allergen content & contamination, foreign-body risk, microbiological contamination, chemical contamination, variety or species cross-contamination, substitution or fraud and any risks associated with raw materials which are subject to legislative control as well as customer requirements. The significance or impact of a raw material to the quality of the final product is also included. The risk assessment forms the basis for the raw material acceptance and testing procedure and is updated when there is a change in a raw material, supplier of a raw material, when a new risk emerges, following a recall or withdrawal, and at least every 3 years. The risk assessment for raw materials was reviewed for: 2025-02-09. The company has a risk-based supplier approval procedure, PGC04 & PGC05 title and date 2025-02-09. The approval procedure includes a valid certification to applicable BRCGS Standard or GFSI benchmark standard for the materials purchased, or supplier audits. Low risk suppliers can be approved initially by completion of a questionnaire that covers food safety, food security & food defence, (HACCP), traceability, and food fraud/authenticity. For raw material the site decided ask for Global G.A.P certificate. - Example: - NM raw material (broker) for pepper: CoC: 8437XXXXX1003 valid until 2026-05-19. Questionnaire: PGC05.RC03. V0, 2023-03-06, signed on 2023-02-23, traceability test performance on 2025-02-09. -E-A for melon, CoC 4063XXXXX1954, questionnaire signed on 2024-02-19, traceability test performed on 2025-02-09. -E.C. raw material lettuce, GGN 40499XXXXX524. PGC05.RC01 V5. approval supplier list for raw material: updated on 2026-01-15. For packaging material: RGSEAA, TDS, conformity declaration and migration test if necessary, GFSI certificate or traceability test every 3 years and questionnaire. The questionnaires are reviewed and approved by quality manager. - Example: EFR (broker) for flow and trays questionnaire (PGC04RC03 V3, 2023-02-09) on 2023-02-10, traza test: 2025-01-20. lot F16102024. Surveillance included on it for incident and comment in annual meeting. PGC04.RC02, V3, approval supplier list for packaging material and service: updated on 2025-02-09. Surveillance included on it for incident and comment in annual meeting. Site procedures also cover ongoing performance. The site is able to identify the last manufacturer/packer. Information is available as required per 3.5.1.1 and 3.5.1.2 to approve the supplier, or the agent/broker/wholesaler is GFSI Benchmark certified. Materials purchased from an agent/broker/wholesaler based on a questionnaire without a GFSI benchmark audit include a verification of traceability. Exceptions to the normal approval process are detailed in PGC04 & PGC05 The approval and acceptance of raw materials purchased by exception include: the same criteria. The site has purchased the following materials by exception: packaging material for one customer and respect the criteria. See minor NC 3.5.1.1: Packaging material specifications are reviewed at a maximum frequency of three years; however, the technical specification for Flow pack PP 30 microns shows the last review dated January 2021. La empresa dispone de fichas de especificación de material de envasado con una revisión máxima de tres años; sin embargo, la ficha técnica de Flow pack PP 30 micras presenta la última revisión en enero de 2021.



**3.5.2 Raw material and packaging acceptance, monitoring and management procedures**

The company has implemented the PGC05 for raw material check and PGC04 for packaging material procedure for the acceptance of raw material and packaging. The acceptance of raw materials and packaging is based on the following: - Raw material: sampling/testing/inspection in each incoming. Eg: product Melon 2025-09-08: Quality check at entrance: °Brix 15-11-14-10. weight check 3,3-2,7-3,9... defects: some one with brown spot. PGC05.RC01 V5. approval supplier list for raw material: updated on 2026-01-15. Surveillance included on it for incident and comment in annual meeting. - Packaging Materials: in each incoming the administration staff signed the delivery note. Example from traza test: Plastic film of the flow pack: delivery note 1012508SDH0047, 2025-08-21. PGC04.RC02, V3, approval supplier list for packaging material and service: updated on 2026-01-15. Surveillance included on it for incident and comment in annual meeting.

**3.5.3 Management of suppliers of services**

The approval and monitoring of Suppliers of Services is defined in PGC04. It is based on risk to the safety and quality of the products, legal compliance and risks to security identified in vulnerability and food defense assessments. The site has the following service supplier(s): - External pest control company. - Transport. - External waste manager - External labs. - Maintenance. Contracts or formal agreements were reviewed for: external pest company. Suppliers of services are approved and evaluated for ongoing performance based on the following criteria: - External pest control company. Authorization ROESBE / contract signed by season A-X. - Transport. RGSEAA / Contract. Example. Caliche. IFS coid 40467 valid until 2026-08-29. Contract signed on 2023-02-10. Example without GFSI: SC Contract signed on 2024-02-09. - External waste manager. Authorization. Solamur reciclados / Materiales reciclados / Hnos inglés. - External labs. ISO 17025 Kudam - Maintenance. Contract. Anfrixa contract signed: 2015-12-31 Records were reviewed for each of them.

**3.5.4 Management of Outsourced processing**

There is not any outsourced processing.



**3.6 Specifications**

PGC03, V.0, 2011-08-01. Customer specification. Specifications are available through (electronic system/online specification system or printed documents) for raw materials/packaging materials/ finished products and outsourced services to ensure compliance with relevant safety and legislative requirements. The specifications include defined limits for relevant attributes of the material which may affect the quality or safety of the final products. Examples included: (chemical, microbiological or physical standards). The specifications reviewed in this audit included: Final product on site: HACCP point 9, Rev.25. 2025-01-10. Melon: origin: Spain and Brazil pH 5,7-7,2 T<sup>a</sup> 8-10°C shelf life 20 days. °Brix 10-11. Pepper: origin: Spain and morocco 6-8°C 10 days. Lettuce: Romana 3-5°C 15 days. and little gem. PGC03.RC01 Rev. 1, 2024-03-04 Romaine lettuce own brand K. All specifications are reviewed periodically (at a minimum every 3 years) to ensure that the data is current by quality manager, and these reviews are documented. The specifications in this audit had last been reviewed on: Final product example form customer: Customer specification product Little gem lettuce, client A-P, 2025-09-29, GG product. Transport T<sup>a</sup> 3- 5°C and label info. Customer specification: A-P (E.), V01 2021-02-09. Green pepper variety padrón 5-25 g, 8-10 °C, packed in cardboard trays into flow pack film 200g, Cat. I. Check on site. Customer specification: S-O, C.: 2024-06-06, Rev 6 melon, variety yellow, cantaloup, galia, piel de sapo, T<sup>a</sup>2-25°C, 9,5-12°Brix Cat I. Example for TDS from packaging material: - Black plastic box: supplier I-O, delivery note 283535019, 2025-02-10, check hygienic condition by stamp, result okay. TDS code BLL4314, date 05/19. -Plastic film for flow pack: supplier S-A, BRCGS Packaging site 150XX24, validate 2026-11-07. Intake 2025-09-15, lot ABT25/01527, TDS PP 30 micras, January 2021. DC and migration test (simulant A and E), 2025-03-05. - Plastic tray (for 6 units): supplier E.F., questionnaire signed 2023-02-10, traceability test performance on 2025-01-20 lot F16102024, delivery note FAC25/01469 supplier lot ABT25/01527, 2025-09-15, TDS 2025-08-18, DC and migration test simulant A, B and D2) 2025-08-18. .

**3.7 Corrective and preventive actions**

The PGC11, V1, 2019-02-01 has been developed for handling and correcting failures identified in the food safety and quality management system. The procedure includes the completion of root cause analysis and implementation of preventive action. If the non-conformity places the safety, legality or quality of product at risk, an investigation is carried out that includes clear documentation, assessment of the consequence, immediate correction, root cause analysis, timescale for corrective action & preventive action, responsibility and verification. Example reviewed during this audit included: PGC10, RC01. Edc.1 Internal audit: Closed check for: Closed check for: BRCGS 6.4.1 IFS 5.4.1., detailed: The metrological verification of quality control scale has not been available. Root cause analysis: Lack of knowledge of quality manager regarding of requirements for scale of quality control. Immediate action: A new scale with metrological control is purchased. Corrective: Training to quality manager. Closed verify on 2026-01-15 by internal auditor. Auditor verified that the corrective actions were reviewed in the management review meeting on meeting minutes dated 2025-01-31. Complaint: 2025-04-01 customer A-P complain product pepper packed plastic flow, delivery note X25/01842. Reason: Rotten some units. Correction: Discount to the client. Root Cause Method & Determination of Cause: Failure to forecast purchases, which resulted in the product being stored for a long time at the facilities. Corrective: improve of the forecast purchase process. Responsible: purchase manager. Date of Verification: 2025-04-15 no more claims.. Records indicate the Corrective/Preventive Action program is effective in preventing recurrence of the root causes.

**3.8 Control of non-conforming product**

The procedure for control of non-conforming or out-of-specification product is PGC10. V6 updated on 2023-02-09. The process in place includes: reporting to quality manager, identification with out of use or red card, secure storage by segregation, quality manager have the responsibility and take the decision, and records including destruction for any food safety reason or repack. No NC product in last season. Product returned to the site is identify, segregated, re-sorting, re-packing or destroyer. The site had no non-conforming product in last season.

**3.9 Traceability**

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The site has a documented traceability procedure PGC06, V4 updated 2023-02-09 designed to maintain traceability throughout the site's processes, and where applicable the legal requirements of the country of sale or intended use. The procedure includes how the traceability system operates and the labelling and records required. Raw materials are traced by software named vision fruit: each incoming is identify with a code is like EN23/00165 save electronically and manually on pallet with label. Packaging material is tracked by: identify manually with the delivery note on pallet and into the software vision fruit. Finished products are traced by: the same software with a final pallet number assigned automatically linked to the entry code. The system for rework is controlled by: with a code is like EN23/00165 save electronically and manually on pallet with label. The site tests the traceability system across the range of product groups to ensure traceability can be determined from the supplier of raw material (including primary packaging) to the finished product and vice versa, including quantity check/mass balance that are carried out on time a year (summer and winter season). The last test was completed on: 2025-05-26 with lettuce (from raw material EN25/00333 to final customer, included mass balance) and 2025-05-26 with lettuce (from customer delivery note X25/02792 date 2025-05-20 to raw material, the label and product mass balance were included). Duration <4 hours. A vertical traceability test was conducted during the audit (<4 h) on lettuce and melon products selected by auditor: A) From raw material to final customer,pepper packed plastic film: EN25/00742 on 2025-09-18, 568 Kg net. Supplier: NDM. Different exits, eg: delivery note: X25/06158, truck R-0733-BYY, pallet 42 Kg net. Mass balance: 568 Kg incoming, 512 Kg exit. 56 Kg waste. B) From customer /final product to raw material: Delivery note: X25/06456 on 2025-10-06. Customer ANC. Order: 25/001319/1. Invoice: CX25/6420 Truck R2134BDS, 112 boxes of Little Gem lettuce packed film plastic and black plastic box, customer's brand B-T. 196 Kg net. Label customer's lot J06, n° palet P25/017387, origin Spain, RGSEA 21.13243/MU. Customer specification: 2025-09-29, Pallet N° P25/017387. Packed on 2025-10-06 Incoming product used: raw material: EN25/00769, 2025-09-30, 37.440 units from the supplier E.C. code 1073. Packaging material used: - Black plastic box: supplier I-O, delivery note 283535019, 2025-02-10, check hygienic condition by stamp, result okay. TDS code BLL4314, date 05/19. -Plastic film for flow pack: supplier S-A, BRCGS Packaging site 150XX24, validate 2026-11-07. Intake 2025-09-15, lot ABT25/01527, TDS PP 30 micras, January 2021. DC and migration test (simulant A and E), 2025-03-05. - Plastic tray (for 6 units): supplier E.F., questionnaire signed 2023-02-10, traceability test performance on 2025-01-20 lot F16102024, delivery note FAC25/01469 supplier lot ABT25/01527, 2025-09-15, TDS 2025-08-18, DC and migration test simulant A, B and D2) 2025-08-18. Mass balance: partida EN25/00769, intake 37440 units, exit 36788 units waste: 652 units. Parallels docs: Expedition doc: CX25/6420 on 2025-10-06. stamped: T<sup>a</sup> truck 4°C product 4°C, hygienic condition ok. Cleaning Log: APPCCRC08, Rev6. daily: conveyor belt, 2025-10-06 by EIGP and check by JMB Cleaning Log: APPCCRC08. Rev6. monthly: 2025-10-07, cold room, soil, door and wall by EIGP and check by JMB. Cleaning Log: APPCCRC08. Rev.6. annual 2025-08-03. field boxes. Maintenance: monthly: APPCCRC09. Rev3. 2025-10-07. Glass control Log: APPCC.RC13. V.0. 2025-10-06, Okay by JMB. Temperature in cold room: APPCC. RC01. V0. Cold room N°1: 2025-10-06, 4°C. verify the probe at the same time by JMB. Shelf life: PGC08.RC07.-. V2. 15 days for little gem lettuce from 2025-10-03 until 2025-10-18. batch 0769. without problem. 466-456 g (6 units). Knives: APPCC 02. Edc0 date 2025-10-06, start 33 knives end 33 knives.

### 3.10 Complaint-handling

Complaints are recorded and investigated according to PGC10. V6 2023-02-09 point 6.5. Actions appropriate to the seriousness and frequency of the problems identified are carried out promptly and effectively by appropriately trained staff. Complaint data is analyzed for significant trends. If there is an increase/trend or a serious complaint, root cause analysis is used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. Site declared: 2023: 3 complaints and 2024: 8 complaints 2025: 6 complaints (defects of quality). They declare that they have not received complaints for foreign bodies. Example reviewed during this audit included: PGC10, RC01. Edc.1 2025-04-01 customer A-P complain pepper packed plastic flow, delivery note X25/01842. Reason: Rotten some units. Correction: Discount to the client. Root Cause Method & Determination of Cause: Failure to forecast purchases, which resulted in the product being stored for a long time at the facilities. Corrective: improve

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of the forecast purchase process. Responsible: purchase manager. Date of Verification: 2025-04-15 no more claims. Significant trends have not occurred over the last 12 months.

**3.11 Management of incidents, product withdrawal and product recall**

The procedure for managing incidents and potential emergency situations that impact food safety, legality or quality is PGC10.V7 2025-02-17. Where products which have been shipped/released by an incident, consideration is given for the need to withdraw or recall products. The procedure for managing withdrawal and recall is PGC10.V7 2025-02-17. Contact person: José Luis Samper; 619117650, samper.joseluis@gmail.com Auditor has confirmed the procedure is adequate for this type of facility/business and meets all the requirements of this clause. The recall procedure is tested at least annually. The last test was conducted on 2025-09-16 with mistake label (number of lot no correct) product Romaine lettuce packed flow pack delivery note X25/05932 date 2025-09-15. The results on file included the total duration (from 09:15-11:25), key activity/timings and a summary that was reviewed by quality manager to make sure that the procedure is appropriate. The recall part of the procedure included the requirement to notify the CB (NSF) within 3-days. There have been 0 of recalls or significant incidents in the past 12 months.

**Details of non-applicable clauses with justification**

Clause/Section Ref	Justification
3.5.4	No outsourced processes.
3.5.4.1	No outsourced processes.
3.5.4.2	No outsourced processes.
3.5.4.3	No outsourced processes.
3.5.4.4	No outsourced processes.
3.5.4.5	No outsourced processes.
3.5.4.6	No outsourced processes.



**4. Site standards**

**4.1 External standards**

The site is suitably sized, located, constructed, and maintained to reduce the risk of contamination and facilitate the production of safe and legal finished products. The facility is located in rural area. Local activities include farm production, olive and lettuce. Grass or planted areas are suitably maintained. Building fabric is maintained to reduce the risk of contamination, ingress of water and pests. External storage areas and are: protected (field boxes). The area is good maintained and locked to prevent contamination. Site Security includes: (partial perimeter fence, CCTV) Employees access the site through only one security gate security. Visitors and contractors must sign in at the entrance (medical questionnaire) location and be supervised while on site.

**4.2 Site security and food defence**

PGC18. V0. 2012-09-12. The company conducted a documented risk assessment (internal and external threat assessment) on 2025-11-11 that considered all of the potential risks to products from any deliberate attempt to inflict contamination or damage. The output was documented in a threat assessment plan that is reviewed annually, last reviewed on 2025-11-24. The same date for alert system test. The responsible team member completing the threat assessment and defense plan have the appropriate knowledge and training: quality manager on 2024-01-08. There is not a legal requirement for training. The plan also is reviewed whenever a new risk emerges or following an incident where product security of food defense is implicated. "no new risks". All materials, products and areas has been considered. Controls included: secure gate, CCTV... Only authorized personnel have access to packinghouse, and everybody is controlled by office staff or quality manager.

**4.3 Layout, product flow and segregation**

The factory layout, flow of processes and movement of personnel is sufficient to prevent the risk of product contamination and to comply with relevant legislation. All is low risk area. The site has the following layout: Raw material and final product // Staff // Packaging material // Waste: 2024-02-01// Water: 2025-07-17. Contractors and visitors, including drivers, are made aware of all procedures for access to premises and the requirements of the areas they are visiting. Contractors who work in product processing or storage areas are controlled by a nominated person – quality manager. The movement of personnel and also process flow did not appear to add risk the safety or contamination of product. There was sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions. The risk of cross-contamination between raw material and finished product is minimal, fresh vegetables.

**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 purpose. There is a main warehouse with the handling area, auxiliary material storage area (film, trays...), 2 cold rooms for finished product. There are 2 cold rooms for raw material located in front, the transfer to the handling area is done in a roofed area and therefore properly protected. There is a warehouse for auxiliary material: cardboard boxes of infrequent use and obsolete material. The canteen is located in another building (a former dwelling) across the street from the personnel entrance. The walls were made from brick blocks finished in smooth painted concrete and designed hygienically. The floors were made from troweled concrete and maintained in suitable condition. Drainage well protected. Ceilings not present any contamination risk. Suspended ceilings were no present. There are not elevated walkways, mezzanines or platforms. The risk of contamination was controlled by production or quality manager. Doors (internal and external) were maintained in good order, and external doors were suitably proofed to prevent pest ingress. Strip curtains were located in incoming area of raw material areas and were well maintained or replaced when damaged

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and kept clean. The standard of lighting was adequate in all areas that included storage, process, packing areas to allow inspection of product and monitor results of cleaning. Adequate ventilation and extraction were also provided in key areas.

**4.5 Utilities – water, ice, air and other gases**

The water comes from the public network (Supplier Aguas de Murcia Contract 6572526, 2025-10-22, invoice XX81636. 140 m3.), direct use without intermediate tank. No purify. No product washing is performed in general (optional washing in melon). Water control plan in point 7.1 of the HACCP: an annual self-monitoring analysis and weekly chlorine controls. The frequency of testing is annually by an approved accredited laboratory Kudam (324/LE1053, ref. 844321, 2024-02-21. Cl 0.28 ppm, micro okay. Control of chlorine and organoleptic quality of water, water points is controlled weekly. APPCC.RC.03 V.2 2023-03-07. Ex. 2025-10-03 point N° 6: 0,4 ppm. and 7 pH by JMB. SINAC 2026-01-07 complete, control test by supplier. 2025-07-17 plan is available with identification of clean water and waste water circuits. Recycled water: none. Compressed air in contact with the product: none. Air as an ingredient or in contact with the product: - none.

**4.6 Equipment**

All the food-processing and food-handling equipment is suitable for the intended purpose and is used to minimize the risk of contamination of product. it was constructed of appropriate materials, as well as designed and located to allow for effective cleaning and maintenance. Line for peppers, a line for lettuce (divided into three lines with a flow pack machine), and a sizing and packaging line for melons. The equipment is typical of the sector, therefore suitable as it is mostly made of stainless steel. The following equipment was in contact with the product: - Conveyor belt. DC: NOVAK 1301 y NOVAK 12G2F. The following purchase specifications were verified for new equipment: Procedure for new equipment in place: APPCC. IT.09, V0. 2023-02-09. New equipment in last 12 months. Second hand equipment on the 2024 season auto weigh machine for pepper plastic bag model Vixo 390 (IRTA M14-YH) (inox steel). acquired on Dec. 2022. Constructed on 2009, there is a report on 2023-02-17, start 2023 March and change the final location on Oct 2023. The procedure for moving static equipment to ensure equipment integrity and product safety. Equipment that is not in use is stored: protected with plastic cover, cleaned and checked before use. Mobile equipment and battery-operated handling and battery charging equipment are managed to prevent product contamination, stored away from open products.

**4.7 Maintenance**

There is a maintenance programme in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns. APPCC. PL03. Rev4. 2024-05-04. The planned maintenance program is managed through documentation system. It includes a schedule of work and a condition monitoring system (inspection of equipment where there is a risk of product contamination) that includes all plant and processing equipment, and material handling equipment. The maintenance requirements are defined when commissioning new equipment or based on history. Planned preventive maintenance is completed by: in house staff. Condition monitoring inspections occur monthly and are completed by production manager. Any damaged equipment is reported in record. The preventive maintenance and condition monitoring inspections are reviewed by: production or quality manager Temporary repairs were not observed. Food grease used: NSF H1 161039 into the workstation, TDS 2025-02-14, absence allergen certificate date 2025-05-05, the site is building a new workshop out site. The following records were reviewed: Example of: External maintenance: A-A delivery note 3571, 2025-10-07, record PGC.07.RC.01 hygienic condition after maintenance task ok. coldroom maintenance Internal maintenance: monthly and annual. example: doing by JGF and check by JMB: monthly: APPCCRC09.

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Rev3. 2025-10-21. See minor NC 4.7.1: The preventive maintenance plan APPCC.PL.03 Rev4 dated 04-03-2024 includes citrus calibrator and citrus packaging machine equipment which are currently not in use. This is a documental deviation. El plan de mantenimiento preventivo APPCC.PL.03 Rev4 de fecha 04-03-2024 incluye el calibrador de cítricos y la máquina envasadora de cítricos, maquinaria que actualmente no se utiliza. Es una desviación documental. Minor NC 4.7.5.: Ice accumulation was observed on the condenser of the finished product cold room; no product risk was identified as no product was stored underneath. Se evidenció acumulación de hielo en el condensador de la cámara de producto final; no se evidenció riesgo para el producto ya que no había producto almacenado debajo.

**4.8 Staff facilities**

Changing facilities for factory personnel included: lockers and hanger. These was sited to allow direct access to the production, packing or storage areas without recourse to any external area. Where this is not possible, a risk assessment would be carried out and procedures implemented accordingly. Segregation of outdoor clothing was achieved by: lockers and hanger. Hand washing stations were located foot-operated toilets and changing rooms and included: - advisory signs to prompt hand washing. - water at adequate temperature - soap (allergen free) - paper. Restrooms were located in the following areas: external house. They did not present any hazard, and had adequate handwashing stations. They also had signs to remind people to wash their hands prior to leaving the area. No catering, yes food vending areas are located onsite in the following areas: entrance near to office. These areas are controlled to prevent potential microbiological and allergen contamination hazards by: training sessions and visual inspection by production or quality manager.

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

**4.9.1 Chemical control**

Processes are in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These included: • availability of material safety data sheets and specifications • confirmation of suitability for use in a food-processing environment • avoidance of strongly scented products • the labeling and/or identification of containers of chemicals at all times • a designated storage area with restricted access to authorized personnel Chemicals reviewed in this audit included: Bleach la salud. Procedures for the safe, legal disposal or return of obsolete or out-of-date chemicals and empty chemical containers has been implemented and included, waste procedure.

**4.9.2 Metal control**

There is a documented policy/procedure for the controlled use and storage of sharp metal implements including knives on equipment, needles and wires. Items are inspected for damage at least daily by production or quality manager. The policies and procedures also prevent the use of snap off blades, push pins, paper clips, etc., in open product areas. The following records of inspection were reviewed: APPCC.02 V0. Knives: APPCC.02. Edc0. example: 2025-10-03, start 33 knives end 33 knives. Knives cleaning instruction: APPCC.PL01. The metal spatula for remove label has been included in APPCC.AN02.

**4.9.3 Glass, brittle plastic, ceramics and similar materials**

The use of glass or other brittle materials is detailed in APPCC.IT02. V0 2011-08-01. List APPCC.AN02. V.1, 2024-02-01. pens included, tablet, mobile equipment, updated on 2024-02-01. The procedure includes the required elements of the Standard. Inspections are completed at least: weekly. There is a

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register that includes glass and other brittle plastics (other than product packaging) in areas where product is at risk if breakage occurs. The register was last updated on APPCC.RC13, V0 2024-02-01. There is a breakage procedure that included all of the requirements. APPCC.IT02. V0 2011-08-01. There has not been a breakage in the last 12 months. Glass windows were located in the following areas where there was open product: storage and packaging areas. They were visual check to reduce any risk. The lights in the facility were protected with plastic cover. Records and inspections reviewed included: example: Glass control Log: APPCC.RC13. V.0. 2025-10-06, Okay by JMB.

**4.9.4 Products packed into glass or other brittle containers**

No product packed into glass or other brittle containers.

**4.9.5 Wood**

The use/condition of wood is covered in the PGC13 site check and internal audit procedure. Wood is used in the following processing areas or applications: pallets in and melon packaging and storage. The controls in place to ensure appropriate suitability, cleanliness and condition included: PGC13.RC.01V.6 2024-03-18, Example of monthly check 2025-10-31. No issues of concern were noted during this audit.

**4.9.6 Other physical contaminants**

APPCC.IT.06 Rev 0, 2011-08-01, knives management. APPCC. IT. 10 REV. 0 2019-03-14 procedure in place to prevent the risk of physical contaminants included: - deboxing - pens used in open product areas - other portable hand held equipment. The APPCC.IT 10 & MA-06 V5. 2024-02-01 procedure has been implemented based on risk to minimize other types of foreign-body contamination. The procedure included questionnaire and interview. No issues of concern were noted during this audit.

**4.10 Foreign-body detection and removal equipment**

**4.10.1 Selection and operation of foreign-body detection and removal equipment**

According to HACCP, detection equipment is not necessary.

**4.10.2 Filters and sieves**

According to HACCP, detection equipment is not necessary.

**4.10.3 Metal detectors and X-ray equipment**

According to HACCP, detection equipment is not necessary.

**4.10.4 Magnets**

According to HACCP, detection equipment is not necessary.

**4.10.5 Optical sorting equipment**

According to HACCP, detection equipment is not necessary.

**4.10.6 Container cleanliness – glass jars, cans and other rigid containers**

According to HACCP, detection equipment is not necessary.

**4.10.7 Other foreign-body detection and removal equipment**



According to HACCP, detection equipment is not necessary.

**4.11 Housekeeping and hygiene**

2 cleaning plans, one for handling areas and the other for common areas. For each area or piece of equipment, the utensils, process by means of pictograms, product and dosage, frequency and person in charge are identified. HACCP handling area cleaning plan. PL.01, V9. 2025-02-18, handling area. For example, knives are disinfected daily with food-grade bleach at a dosage of 100ml/10L of water; the cold rooms are cleaned and disinfected monthly with degreaser and food-grade bleach. All machinery (bodies, casing and structures) are thoroughly cleaned annually with degreaser and food-grade bleach. HACCP cleaning plan for common areas. PL02, V4. 2023-02-09, common areas. APPCC.RC.08 records are kept in which daily, monthly and annual cleanings are recorded. Each form has a reminder at the bottom of the page of the area/equipment, frequency, operating mode, product and dosage. Cleaning Log: APPCCRC08, Rev6. daily: conveyor belt, 2025-10-06. by EIGP and check by JMB Cleaning Log: APPCCRC08. Rev6. monthly: 2025-10-07, cold room, soil, door and wall by EIGP and check by JMB. Cleaning Log: APPCCRC08. Rev.6. annual 2025-10-31. field boxes. The use of utensils is properly defined to avoid cross-contamination risks: dark blue wipes for men's toilets, red wipes for women's toilets, green wipes for lockers, and light blue for lines. The utensils are correctly stored in a cupboard; there is a specific cupboard for utensils and products with dispensers. These cabinets are padlocked and the AGS cleaning manager is interviewed. FT and SDS present in the cleaning products cabinet are verified for La salud brand food grade bleach and SGRASS SG20+ degreaser (alkaline, undiluted spray, professional use, for kitchens, 18-20/04020HA). Cleaning employee EIGP last training session 2025-01-09, cleaning plan, record, ppe and job card. 1,5 h by external consultant PNS. Cleaning efficiency is verified with analysis: APPCC.RC.11 Rev2. 2025-12-19, annual analysis of knife surface, line and wall of a cold room is established (enterobacteria <5UFC/25cm2, molds and yeasts <50ufc/25cm2, TVC <75ufc/25cm2), 1 annual analysis of cold room environment (mesophilic aerobes <20ufc/100l, and molds and yeasts <3 ufc/100l). A guide provided by the laboratory is used to define the limits. If the limits are exceeded, the cleaning frequency is increased. - Knives: by Kudam: 1054059, 2026-01-12, TVC, enteros, mould and yeast. Okay. - Ambient cold room Kudam ref. 1054057, 2026-01-12, mesophiles 8 UFC/plate (<15ufc(plate) molds and yeasts 28 ufc/plate (<30 ufc/plate). - Conveyor belt: kudam. ref. 1054060, 2026-01-12, entero<5UFC/100cm2, molds and yeasts < 5UFC/25cm2 and TVC 9 ufc/25 cm2. Okay by external assessor. - Clothes ref. 1054058 date 2026-01-12, TVC 7 ufc/25cm2, entero <5UFC/100cm2 , molds and yeasts < 5UFC/25cm2. The site was observed to be in maintained in a sanitary condition. See minor NC 4.11.1: In general, facilities were in adequate cleaning conditions; however, a spider web was observed on the ceiling of the auxiliary material warehouse. En general, las instalaciones se encontraban en adecuadas condiciones de limpieza; sin embargo, se evidenció una telaraña en el techo del almacén de material auxiliar.

**4.11.7 Cleaning in place (CIP)**

No CIP on site.

**4.11.8 Environmental monitoring**

There is a risk based environmental monitoring program in place for pathogens or spoilage organisms. APPCC.RC.11 Rev2. 2025-02-19, The risk assessment was completed or last reviewed on annual basis. The Environmental monitoring procedure and program includes: Areas sampled Frequency of testing Number of samples per test. Limits per organism. The corrective actions for results over the defined limits include increase cleaning frequency. Annual analysis of knife surface, line and wall of a cold room is established (enterobacteria <5UFC/25cm2, molds and yeasts <50ufc/25cm2), 1 Annual analysis of cold

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room environment (mesophilic aerobes <20ufc/100l, and molds and yeasts <3 ufc/100l). A guide provided by the laboratory is used to define the limits. If the limits are exceeded, the cleaning frequency is increased. Results and any trends are monitored and reviewed by external assessor and quality manager annually. The procedure is reviewed at least annually by QM and whenever there are changes to processing conditions, new developments in scientific information, product testing failures, failures of program to identify a specific hazard and when only consistently negative results are found. Examples: - Knives: by Kudam: 1054059, 2026-01-12, TVC, enteros, mould and yeast. Okay. - Ambient cold room Kudam ref. 1054057, 2026-01-12, mesophiles 8 UFC/plate (<15ufc(plate) molds and yeasts 28 ufc/plate (<30 ufc/plate). - Conveyor belt: kudam. ref. 1054060, 2026-01-12, entero<5UFC/100cm2, molds and yeasts < 5UFC/25cm2 and TVC 9 ufc/25 cm2. Okay by external assessor. - Clothes ref. 1054058 date 2026-01-12, TVC 7 ufc/25cm2, entero <5UFC/100cm2 , molds and yeasts < 5UFC/25cm2.

**4.12 Waste and waste disposal**

PGC19. V.0, 2011-08-01. Waste disposal plan. Waste disposal is managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests. Waste containers observed during this audit (internal and external) were being managed to minimize risk. Controls for removal in open product areas (all low risk) included, covered bins, etc. - External company: Materiales reciclados (GDI20141050), 2025-12-12 cardboard waste.

**4.13 Management of surplus food and products for animal feed**

Processes are in place to ensure the safety and legality of by-products from the site. The process for customer branded products (surplus and/or out of specification down grade) included on PGC19. The site is able to trace products sold to employees or donated to organizations by traceability procedure but not in last season. The following materials are sent to animal feed: organic waste. Products sent to animal feed were suitably segregated and protected from contamination during storage and managed according to legislative requirements. - Example: Animal feed N°REGA ES300371340033. Contract signed on 2025-05-22

**4.14 Pest management**

The site has an effective preventive pest management program in place to minimize the risk of infestation that also complies with applicable legislation. APPCC point 7, included pest control. The pest control program is operated by an approved third-party pest control company (named: Quipons/Anticimex) ROESBE 1185-MUR-T09 contract N° 3606-2024., 6 inspection/year for rodents and crawling insect, 4 inspection for EFK. The pest control program is managed in-house by a suitably trained employee and is detailed in APPCC point 7 procedure. Last visits: 2026-01-12 rodents, crawling and EFK: no detection, non-incident, disinfection is performed with Ox virin 15/20 40-90-02518. 2025-11-25: no detection rodents, crawling and change adhesive film on EFK, no detection. 2025-10-13: change light in EFK. Bait site map: 2025-01-31, 4 EFK. E.x. N° 5 incoming door. Trend analysis: form Jan to dec 2025. levels of: low rodents, low crawling, low fliers. 2026-01-09. Visit annual diagnosis/ Pest survey: 2026-01-09, no recommendations. All employees have been training in detect the signs of pest activity on 2026-01-09, duration 2 hours by external consultant FNS check: ABG, ACC. See minor NC 4.14.6: An insect light trap was observed switched off in the loading dock area. Se evidenció un insectocaptor apagado en la zona del muelle de carga.



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**4.15 Storage facilities**

The facilities used for the storage of raw materials, packaging, in-process products and finished products were deemed to be suitable for purpose. There is a main warehouse with the handling area, auxiliary material storage area (film, trays...), 2 cold rooms for finished product. There are 2 cold rooms for raw material located in front, the transfer to the handling area is done in a roofed area and therefore properly protected. There is a warehouse for auxiliary material: infrequently used cardboard boxes of obsolete material. Field boxes are stored outdoors and returnable plastic crates for use in finished product are stored in a covered area and properly protected with plastic covers. Procedures to maintain product safety and quality during storage included: • managing chilled and frozen product transfer between temperature-controlled areas • segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) • storing materials off the floor and away from walls • specific handling or stacking requirements to prevent product damage. Temperature control was required for all products. The site facilitates correct stock rotation of raw materials, intermediate products and finished products in storage and ensures that materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life. Records reviewed included: examples Temperature in cold room: APPCC. RC01. V0. Cold room N°1: 2025-10-06, 4°C. verify the probe at the same time by JMB. See minor NC 4.15.1: Pallets were observed stored directly against the wall in the auxiliary material warehouse. Se evidenciaron palets almacenados junto a la pared en el almacén de material auxiliar.

**4.16 Dispatch and transport**

PGC08.V01 2011-08-01, quality control. Procedure is in place to ensure that the management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety, security or quality of the products. These included: • controlling temperature of vehicles • the use of covered bays for vehicle loading or unloading • inspection of loads prior to dispatch. • mixed load restrictions • requirements for the security of products during transit, particularly when vehicles are parked and unattended • clear instructions in the case of vehicle breakdown, accident or failure of refrigeration systems Vehicles used for the transport of raw materials and the dispatch of products are inspected for: • in a clean condition • free from strong odors which may cause taint to products • in a suitable condition to prevent damage to products during transit • equipped to ensure any temperature requirements can be maintained throughout transportation. Records of these inspections are maintained, ones reviewed during this audit included: Expedition doc: CX25/6420 on 2025-10-06. stamped: T<sup>a</sup> truck 4°C product 4°C. cleaning. Transport is managed by approved third-party contractors. There were contracts or terms and conditions available for review that included the requirements or the company was certified to a recognized GFSI Distribution Standard. An example reviewed included: Example. Caliche. IFS Logistic Coid 40XX7 valid until 2026-08-29. Contract signed on 2023-02-10. Example without GFSI: LG Contract signed on 2024-02-20.

**Details of non-applicable clauses with justification**

Clause/Section Ref	Justification
4.4.5	No suspended ceilings were noted.
4.4.6	No elevated walkways, access steps or mezzanine floors.
4.5.3	Air control is not required (fresh product), other gases are not used. No controlled or modified atmosphere on site. No compresses air is in direct contact with product.



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4.6.1	No raw materials requiring debagging or deboxing.
4.6.6	No mobile equipment used from external areal to the packing area. All low risks area.
4.8.6	Smoking is not permitted onsite.
4.9.1.2	No strongly scented or taint forming materials used onsite.
4.9.4.1	Products are not packed into glass or other brittle containers.
4.9.4.2	Products are not packed into glass or other brittle containers.
4.9.4.3	Products are not packed into glass or other brittle containers.
4.10.1.2	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh). No Foreign body detection devices
4.10.1.3	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh). No Foreign body detection devices
4.10.1.4	HACCP has determined that is not necessary, evaluating the risk and the type of produce (whole, fresh). No Foreign body detection devices
4.10.2.1	There are no filters or sieves in the production area for foreign body detection.
4.10.2.2	There are no filters or sieves in the production area for foreign body detection.
4.10.3.2	No metal detectors or X Rays in use as determined by risk assessment.
4.10.3.3	No metal detectors or X Rays in use as determined by risk assessment.
4.10.3.4	No metal detectors or X Rays in use as determined by risk assessment.
4.10.3.5	No metal detectors or X Rays in use as determined by risk assessment.
4.10.4.1	No magnets are used
4.10.5.1	No optical sorting equipment is used.
4.10.6.1	No glass jars or cans containers are used.
4.10.6.2	No glass jars or cans containers are used.
4.10.7.1	No other foreign body detection and removal equipment is used on site.
4.11.7.1	There are no CIP operations on site.
4.11.7.2	There are no CIP operations on site.
4.11.7.3	There are no CIP operations on site.
4.11.7.4	There are no CIP operations on site.
4.12.4	No unsafe products or substandard trademarked materials transferred to a third party for destruction or disposal.



4.13.1	No surplus of customer branded products, no customer requirements.
4.13.2	No customer branded products given to staff or charities.
4.14.3	External pest control company used, including all areas of the site and specifies preventative measures. The site does not undertake its own pest control.
4.15.4	No controlled atmosphere or degreening is required.

<b>5. Product control</b>	
<b>5.1 Product design/development</b>	
<p>APPCC. IT05. Rev.0, 2012-02-21. The site has a product design and development procedure that details the required actions for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced. It also includes guidelines on any restrictions to the scope of new product developments to control the introduction of hazards that are unacceptable to the site or customers (E.g. the introduction of allergens, glass packaging or microbiological risks). No product design is performed on whole fresh fruits and vegetables. No changes in the process, products, packaging or labeling. Validation of expiration dates is not required. Shelf life controls are recorded in PGC.08.RC.07. A sample of finished product representative of each batch of raw material is retained daily. PGC08.RC07. V.2 of 2020-07-10. Shelf life: PGC08.RC07.-. V2. 15 days for lettuce from 2025-10-03 until 2025-10-18. Batch 0769.without problem. 466-456 g. No weigh on label, 1 unit.</p>	
<b>5.2 Product labelling</b>	
<p>The process for product labeling is documented in the PGC08.IT. example 03 for melon procedure / 05 for lettuce / 06 pepper. Label of unit and box are keep, the rule for print label is 2% more. It details how legal requirements are met in the country of manufacture and in the country of sale. Labels not need to be designed to include information to enable the safe handling, display, storage and preparation of the product throughout the entire food supply chain, fresh vegetables. Labeling information is reviewed whenever changes occur to the product recipe, raw materials, the supplier of raw materials, the country of origin of raw materials or legislation. When customers or nominated third parties are responsible for label design and artwork, the company provides information to enable the label to be accurately created and/or whenever a change occurs which may affect the label information. Example: Mail customer A. confirmation label check: 2025-09-29, Little gem lettuce Cat I, 6 pieces. The following claims are made if customer required it: GGN. No cooking instruction on label.</p>	
<b>5.3 Management of allergens</b>	
<p>The site has a system for the management of allergenic materials that minimizes the risk of allergen contamination of products and meets legal requirements for labeling in the country of sale. The site conducted a risk assessment of raw materials to establish the presence and likelihood of contamination by allergens on HACCP in line Codex updated on Rev.25, 2025-01-10, No allergens handled on site. Procedures are in place to prevent allergen cross-contamination (cross-contact) of products not containing the allergen. These include: • Hand washing, clothes change. • restrictions on food brought onto site by staff, visitors and contractors and for catering purposes.</p>	

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**5.4 Product authenticity, claims and chain of custody**

The following systems are in place to minimize the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions and claims are legal, accurate and verified: PGC06.IT01. V4 updated 2024-02-09. included risk assessment. PGC06. RC04, product raw material and packaging. PGC06.RC03 supplier raw material, packaging material and services. updated 2024-02-09, reviewed annually by QM and external assessor. RASFF and AECOSAN alerts are verified monthly (recorded in monthly meetings).The QM and external assessor position completing the assessments demonstrated the appropriate knowledge and/or training. This included: agricultural engineer. Level 6-7 EQF. The following materials had been reviewed: GlobalG.A.P certified product. Risk mitigation controls included: check GGN on database. The following claims are made on finished products pack labels: assured status (e.g. Global G.A.P.) Confidence values are taken into account based on business history, direct sales or sales through intermediaries, EU or non-EU origin, accessibility of supplier information. Specifically, the danger of substitution of the raw material by another variety (low risk), raw materials with active ingredients above the MRL or not authorized (low risk), product not certified in GLOBALG.A.P. (low risk), mislabeled product (low risk) are evaluated. For packaging material (differentiating cardboard, wood, film, flowpack, plastic boxes) the risk of substitution by non-food use material, mislabeled product, lower grammage than requested, product of lower quality than requested (low risk for all cases) is also evaluated. The control measures identified are supplier approval, reception process (not accepted if there are signs of having been manipulated, operator with experience in receiving materials). Claims: They state that they have no special varieties or denomination of origin. Controls to substantiate the claims included, certifications, mass balances etc). GG mass balance: from Jan to Dec. 2025: 100% incoming product are GG certified. Ex. lettuce: incoming GG 18.182.253 units GG 17.158.842 units waste 1.023.411 Kg. The process flows for these products were documented and potential areas for contamination or loss of identity were identified.

**5.5 Product packaging**

Packaging used: cardboard boxes, plastic and wooden (melon), flow pack, plastic or cardboard tray with flow pack and cardboard tray liners. The melon can be packed with wood chips and plastic. The company requests the technical data sheets and certificates of conformity from the suppliers of packaging and packaging materials. Product packaging is appropriate for the intended use and was being stored under conditions to prevent contamination and minimize deterioration. The specifications that included the characteristics of the food type and other packaging used on the product were on file. The ones for the following were reviewed in this audit: summarize Example for TDS from packaging material: Example for TDS from packaging material: - Black plastic box: supplier I-O, delivery note 283535019, 2025-02-10, check hygienic condition by stamp, result okay. TDS code BLL4314, date 05/19. -Plastic film for flow pack: supplier S-A, BRCGS Packaging site 150XX24, validate 2026-11-07. Intake 2025-09-15, lot ABT25/01527, TDS PP 30 micras, January 2021. DC and migration test (simulant A and E), 2025-03-05. - Plastic tray (for 6 units): supplier E.F., questionnaire signed 2023-02-10, traceability test performance on 2025-01-20 lot F16102024, delivery note FAC25/01469 supplier lot ABT25/01527, 2025-09-15, TDS 2025-08-18, DC and migration test simulant A, B and D2) 2025-08-18.The specifications included statements of FDA compliance and CoCs were held on file for each delivery. Product liners and bags purchased by the company for use in direct contact with ingredients, or work in process, were coloured blue and resistant to tearing to prevent accidental contamination. The procedure to manage obsolete packaging (including labels) included mechanisms to prevent accidental use of obsolete packaging, control and disposal of obsolete packaging, appropriate procedures for the disposal of obsolete printed materials (e.g. rendering trademarked materials unusable).



**5.6 Product inspection, on-site product testing and laboratory analysis**

Inspection and analysis critical to confirm product safety, legality, integrity and quality are conducted in house & subcontracted to an approved laboratory that use appropriate procedures, facilities and standards. APPCC.RC07. Rev7, 2025-12-19. test plan Nitrate on lettuce 2/year, chlorate perchlorate/year/product pesticide: monthly/product. Heavy metals/year and product. Examples check: - Nitrate on lettuce: ref. 985276, 2025-06-10, 490 mg/Kg. Limit 4000. - Chlorate: lettuce. ref. 1054065, 2026-01-08, <0,1 mg/Kg chlorates & <0,1 mg/Kg perchlorate. Melon. Ref: 1054064, 2026-01-08 <0,1 mg/Kg chlorates & <0,1 mg/Kg perchlorate.- Heavy metal: melon ref. 1054051, 2026-01-08, Pb, Cd, Ni. lettuce ref. 1054050, 2026-01-08, Pb, Cd, Ni. Okay - Pesticides: lettuce: ref. 995148, 2025-07-03, detection: difenoconazol 0,013 MRL 4 mg/Kg, acetamiprid 0,031 mg/kg, MRL 1,5 mg/kg. Okay. - Pesticides: pepper bell: ref. 956533, 2025-03-04, trifloxistrobina 0,020 MRL 0,90 mg/kg, sulfoaflor 0,11 mg/kg, MRL 0,40 mg/kg. - Pesticides: pepper: ref. 937251, 2025-01-07, detection fenpiroximato 0,018 MRL 0,30 mg/Kg. Okay. Trend test: excel sheet: example melon from March 2025 until date: pesticide 9 test performed on lettuce, acetamiprin 4 test and difenoconazol in 4 test result below MRL. No in house test. The routine product testing laboratory also had suitable design and controls. The subcontracted testing was carried out by an approved laboratory was accredited. Kudam: (324/LE670) The analysis critical to product safety or legality use test methods that are accredited or operate in accordance with the requirements and principles of ISO/IEC 17025. Reliability of laboratory results, other than those critical to safety and legality: • use of recognised test methods The significance of laboratory results are reviewed by QM position, and actions are taken to address any unsatisfactory results or trends including violation of any legal limits. Auditor reviewed an out of specification or limit result for the following; no one test out of specification on site. The analysis critical to product safety or legality use test methods that are accredited or operate in accordance with the requirements and principles of ISO/IEC 17025. The subcontracted testing was carried out by an approved laboratory was accredited. Kudam: (324/LE670).

**5.7 Product release**

No need for release analysis, controlled release. Daily product controls are performed.

**5.8 Pet food and animal feed**

No pet food or animal feed produced on facility.

**5.9 Animal primary conversion**

No animal primary conversion undertaken.

**Details of non-applicable clauses with justification**

Clause/Section Ref	Justification
5.1.3	Since the last audit no new process, packaging, storage or distribution developments have been made. No trials as established process and no deviation possible, single raw material.



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5.2.4	No cooking instructions are provided.
5.3.5	There are no allergens handled on this site.
5.3.6	There are no allergens handled on this site.
5.3.7	There are no allergens handled on this site.
5.3.8	There are no allergens handled on this site.
5.4.6	No claims about production methods are made (e.g. Organic).
5.4.7	There are no product claims made (e.g. Nutritional info, allergen free).
5.6.5	There is no laboratory on site.
5.6.7	Accredited laboratories are used. No laboratory testing on site.
5.8	No pet food or animal feed produced on facility.
5.8.1	No pet food or animal feed produced on facility.
5.8.2	No pet food or animal feed produced on facility.
5.8.3	No pet food or animal feed produced on facility.
5.8.4	No pet food or animal feed produced on facility.
5.9	No animal primary conversion undertaken.
5.9.1	No animal primary conversion undertaken.
5.9.2	No animal primary conversion undertaken.
5.9.3	No animal primary conversion undertaken.
5.9.4	No animal primary conversion undertaken.

## 6. Process control

### 6.1 Control of operations

The site has procedures and/or work instructions to ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan. Documents available included process specifications and work instructions/procedures for the key processes that included: • equipment process settings • cooling times and temperatures • labeling instructions The sorting, sizing and packaging processes are controlled by the quality control of the finished product. Necessary process controls are carried out: cold room temperature control, water chlorine control, etc. Verified for packaging. Okay labeling control. Weight control. Temperature control of cold rooms APPCC.RC.01: the temperature of each cold room is recorded daily. Control of chlorine and organoleptic quality of water APPCC.RC.03. There is no change of products in line, each line is exclusive of one product. There had been 0 cases or equipment failure or deviation from the process specification in

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the last 12 months. By products or materials outside or excluded from the scope of the audit are not handled on site.

**6.2 Labelling and pack control**

There appeared to be adequate management control of product labelling activities to ensure that products are correctly labeled and coded. The process for the allocation, monitoring, verification, and reconciliation of label use is as follows: labels are controlled by production manager and reconciled by office staff who printed it. Production manager carry out checks of the production line prior to starting production. These checks ensure that lines have been suitably cleared and are ready for production, and packaging from the previous production have been removed from the line. These checks are recorded on PGC.08.RC.05 Auditor was unable to witness a labeling change over on line because no change was made. The auditor check some labels on site: example lettuce L-501. Checks are completed by quality manager to make sure that products are packed into the correct packaging as follows: • during the packing run The checks shall also include verification of any printing carried out at the packing stage including: • batch coding There is not inline verification equipment (bar code scanners) used to check product labels and printing. Label check: PGC.08RC11 V0. 2023-03-07. example: 2026-01-26, printed 82 units for units 80. the not used label have been eliminated. During the audit were checked the next change of label performed on 2026-01-26: From label of product little gem lettuce 6 units packed plastic flow, lot A-27, client A-P. to label of product Romaine lettuce 2units packed plastic flow lot L501, client F.V..

**6.3 Quantity, weight, volume and number control**

Lettuces and melon are sold by number of pieces according to size. Peppers in bags or in trays with flowpack are sold by weight. The company doesn't use the "e". The site operates to the following quantity control system; sampling. PGC08.IT.05 lettuce. PGC.08.IT06 pepper 2 box/order PGC.08.IT.03 melon 2 box/order Weight and defect tolerances are specified in the instructions. In the case of lettuce, it is sold by number of pieces (in trays or flowpacks). Weights are checked to validate that the size corresponds to the size requested by the customer. Sales units of at least 2 boxes are verified for each package. The same process is used for melons, which are sold by number of pieces according to size. Peppers in bags or in trays with flowpack are sold by weight. The operators fill each bag or tray on a 2-pan scale, comparing it with a verified sample. Another operator rechecks the weight on an internally verified scale with accredited standard masses (at least one out of 10 units), this online check is not recorded. The quality controller rechecks all sales units of at least one box in each package. The records reviewed during this audit were all found to be in good order and complied with the relevant legislation. Quality control: PGC.08.RC05. rev.2. 2025-10-06. by JVC. without defect. 4°C. weight: 54 units: 425-478 g (no weigh on label). The ones reviewed during this audit appeared to be in good order and met the customer expectations. Online check weighers were not used.

**6.4 Calibration and control of measuring and monitoring devices**

The site has processes in place to make sure that measuring equipment is sufficiently accurate and reliable to provide confidence in measurement results. Procedure PGC-09, V.0 of 01-08-2011. The site procedure included: • a documented list of equipment • an identification code and calibration due date List of equipment PGC.09.PL.01 updated on 2026-01-15. The site has identified the following measuring equipment used to monitor product safety, legality and quality that needed to be calibrated: Melon calibrated scale: internal verification on 2025-10-11. In cold room temperature control APPCC.RC.01, once a week comparison with digital thermometer - performed on 2025-10-11. Thermometer T1 supco ST09 external calibration 2023-01-20 (every 5 years). Thermometer T2 laser expedition: verification 2024-11-02. Annual verification of line scales (4): 2025-11-03. MOBBA pallet weighing performed on 2025-11-19. every two years. The set of standard masses (200 and 1000g) verified calibration certificate by Metrología del sureste (ENAC 150/LC403) of 2012-02-28. Cleaning dispensers 2023-11-02. internal

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verification. The quality control scale metrological verification by Giropes, serial number 5211210125, 2026-01-09. The procedure also referenced the need for reference measuring equipment also be calibrated and traceable to a recognized national or international standard and records maintained. The procedure also detailed actions to be taken when the prescribed measuring devices are found not to be operating within specified limits and action taken to ensure at-risk product is not offered for sale. This had occurred 0 times in the last 12 months.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.1.4	No in line monitoring devices are used to control process parameters or product quality (e.g. optical sorter or gauge).
6.1.6	No risk to product safety through equipment failure.
6.1.7	No by-products (outside of scope or not food use) are handled on site.
6.2.4	No online vision equipment is used to check product label (e.g. bar code scanners).
6.3.3	No online check weighers are used.

<b>7. Personnel</b>
<b>7.1 Training: raw material handling, preparation, processing, packing and storage areas</b>
The company has systems in place to ensure that all personnel who perform work that affects product safety, legality and quality are competent to carry out that activity, through training, work experience or qualification. Procedure training PGC.14. V.0, 01-08-2011. All relevant personnel, (agency-supplied staff used), temporary staff and contractors, receive the following training: PGC.14.PL.01, V8, updated 2026-01-09. 2025: training: food contamination, preventive measures and hygiene standards, mandatory standards for food handlers, HACCP, allergens, Food Defense, pest detection, job responsibilities and development, quality policy, food fraud, packaging and labeling, latest version of hygiene standards, suggestion box, instructions in case of plastic loss or knife breakage, fraud in January, PRL, first aid, performed on 2026-01-09, 4 hours by external advisor FNS. Refresher training is completed at least Annually last on 2026-01-09. Employees who were interviewed during the inspection demonstrated the appropriate skills and knowledge. Examples of employees interviewed included: JV. Training records reviewed included the appropriate information and were complete. The process for reviewing competency of staff included: site check, coaching, mentoring or on-the-job experience Revised training VBG given on 2026-01-09, by FNS verified effectiveness with the site check.
<b>7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas</b>
The site's personal hygiene standards have been developed to minimize the risk of product contamination from personnel and are appropriate to the products produced. All personnel are required to follow these rules when in the production areas of the facility. The requirements for personal hygiene are documented in MA-02. V. 8, 2024-02-01 and include the requirements as noted in the Standard. The site monitors

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compliance with requirements on a daily frequency basis. Auditor observed employees to be compliant and observant of GMP/Hygiene rules. (VMG quality control / MAGA handler) Hand-washing is performed on entry to the production areas. No violation was observed during this audit. Plaster with different color were used. The rules also cover the control of medicines with no issues of concern were noted.

**7.3 Medical screening**

The company has procedures in place to ensure that employees, contractors or visitors are not a source of transmission of food-borne diseases to products. Procedure MA-02. V. 8, 2024-02-01 requires notification by employees, including temporary employees, to report symptoms, infection, disease or condition with which could present a risk to product safety. Visitors and contractors are required to sign MA-08, v1 2020-04-23 that covers the hygiene rules and also reporting of any illness or disease that could be a risk to the product. Plaster log: 2024-05-07: to A. 11:00 and check on 18:00. blue color. There is a legal requirement for employees to be subjected to medical screening. When screening occurs, this is managed by: OTP 12 of March 2026 for this session, last one in March 2025.

**7.4 Protective clothing: employees or visitors to production areas**

There was a risk assessment HACCP in line Codex updated on Rev.25. 2025-10-01 that states protective clothing (excluding head coverings) is not required in the following areas; the GMP procedure MA-02. V. 8, 2024-02-01, did have details stating that normal clothing shall not present a risk to product (such as no buttons, top pockets, not fraying, etc.). Protective clothing is worn by employees in specified work areas: all except offices and outdoors. Visitors and contractors are required to wear protective clothing when entering packinghouse areas. Protective clothing: • is provided in numbers to allow sufficient changes when soiled • is of suitable design to prevent contamination of the product • fully contains all scalp hair to prevent product contamination • includes snoods for beards and mustaches, where required, to prevent product contamination. No violation was observed during this audit. The laundering of protective clothing is carried out by staff at home. MA.09 Rev. 1. 2022-01-31: weekly, >60°C, soap according to manufacturer's dosage. Protective clothing that is home laundered is used to protect the employee from processing materials in low-risk areas only (fresh and vegetables guide line). Examples of home laundered PPE included: gown and cap. Nitrile gloves in use were colored blue and did not pose a risk. They were changed at appropriate frequencies and when soiled or damaged. No issues of concern were noted during this audit. See minor NC 7.4.3.: The hygiene rules for workers MA-02 V8 dated 01-02-2024 do not define how employees must bring their self-laundered uniforms to the facility in order to prevent contamination. Las normas de higiene para los trabajadores MA-02 V8 de fecha 01-02-2024 no definen cómo deben traer los trabajadores a las instalaciones el uniforme lavado por ellos, con el fin de prevenir riesgos de contaminación.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
7.2.4	Metal detection equipment is not used onsite.
7.4.6	Items of personal protective clothing are suitable for laundering. Single-use gloves.



<b>8. Production risk zones – high risk, high care and ambient high care production risk zones</b>
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not Applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Equipment and maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
8.1	No risk area
8.1.1	No risk area
8.1.2	No risk area



8.1.3	No risk area
8.1.4	No risk area
8.2.1	No risk area
8.2.2	No risk area
8.2.3	No risk area
8.3.1	No risk area
8.3.2	No risk area
8.3.3	No risk area
8.4.1	No risk area
8.5.1	No risk area
8.5.2	No risk area
8.5.3	No risk area
8.5.4	No risk area
8.6.1	No risk area
8.7.1	No risk area
8.7.2	No risk area
8.7.3	No risk area

<b>9. Requirements for traded products</b>
<b>9.1 The food safety plan - HACCP</b>
Not Applicable
<b>9.2 Approval and performance monitoring of manufacturers/packers of traded food products</b>
Not applicable
<b>9.3 Specifications</b>
Not applicable



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9.4 Product inspection and laboratory testing
Not applicable
9.5 Product legality
Not applicable
9.6 Traceability
Not applicable

<b>14.1 Additional Specifier Requirements</b>
14.1 Traceability
Not applicable
14.2 Environmental Monitoring
Not applicable.
14.3 Product inspection and laboratory testing
Not applicable.
14.4 Protective clothing: Employees or visitors to production areas
Not applicable.

