

Audit Report

Global Standard for Consumer Products Issue 4: November 2016

General Merchandise Foundation level

1. Audit Summary			
Company name	Ningbo Sincere Leisure Products Co., Ltd.	BRC Site Code	3243630
Site name	Ningbo Sincere Leisure Products Co., Ltd.		
Audit Level	Foundation Level		
Scope of audit	Manufacture of pet products (such as pet feeders, pet fountains, pet toys) with injection moulding, pad printing, assembly and packing process.		
Exclusions from scope	Nil		
Justification for exclusion	NA		
Audit Finish Date	2020-08-03		
Re-audit due date	2021-08-03		

Voluntary modules included		
Modules	Result	Details
Choose a module	NA	Nil

2. Audit Results					
Audit result	Certificated	Audit grade	No Grade	Audit type	Announced
Previous audit grade	No Grade		Previous audit date	Select a date	

Number of non-conformities	Fundamental	0
	Critical	0
	Major	1
	Minor	9

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
CP413 – English CP Template GM Foundation V2	Page 1	Report No. CN/SAS-286	Auditor: Barry Shi

3.Site Details

Address	No. 8, Chunhui Road, Zhonghe Subdistrict, Yinzhou District, Ningbo City, Zhejiang Province, China/ 315000		
Country	China	Site Telephone Number	86 15099784266
Commercial representative Name	Thoms Qiu	Email	thoms.qiu@sincerepet.com
Technical representative Name	Roger Luo	Email	roger.luo@sincerepet.com

4.Site Profile

Plant size (metres square)	<10K sq.m	No. of employees	51-500	Key Processes	1-3
Subcontracted processes	No				
Other certificates held	ISO9001:2015				
Regions exported to	Europe North America Choose a region Choose a region				
Major changes since last BRC audit	NA				

Company Description

Ningbo Sincere Leisure Products Co., Ltd is a private company. It was established in 1998 and located at No. 8, Chunhui Road, Zhonghe Subdistrict, Yinzhou District, Ningbo City, Zhejiang Province, China/ 315000. There are one 2-storey and one 3-storey production building on site. The factory provided lease contract showed they rented the 1st floor and 3rd floor of one 3-storey building to Ningbo Guoyuan Construction and Development Co., Ltd. These rented areas are used for storefronts and warehouse. The total floor area of company is approx. 3,000 s.q. meters. The production area is approx 2,000 s.q. meters and the warehouse floor is approx 1,000 s.q. meters.

There are total 56 employees in the company. Two shifts for injection workers: 8:00-20:00; 20:00-8:00 One shift for others: 8:00-11:30; 12:30-17:00 and 6 days per week for all employees. The maximum monthly production capacity is about 26,000pcs for pet products.

The main products in the company is pet products (such as pet feeders, pet fountains, pet toys). The certificated product of the company is pet products for Europe and America markets.

The main production processes are Incoming material- Injection moulding- Pad printing- Assembly- Packing. The company has obtained the ISO9001:2015 certificate, which issued by QAIC on Jul. 11, 2019 and until Jul. 10, 2022, Certificate no.: QAIC/CN/195119.

5. Product Characteristics

Product categories	09 - Rubber & plastic products 15 - Electrical equipment, batteries Category Category
Product Technologies	A4 Rubber and Plastics
Product claims made	Pet products (such as pet feeders, pet fountains, pet toys)
Product recalls in last 12 Months	No
Products in production at the time of the audit	Pet feeders, pet fountains, pet toys

6. Audit Duration Details

On-site duration	8 man hours	Duration of production facility inspection	4 man hours
Reasons for deviation from typical or expected audit duration	NA		
Next audit type selected	Announced		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2020-08-03	09:00	18:30

	Auditor_(s) number(s)	Names and roles of others
Auditor Number	176726	Barry Shi/ Leader Auditor
Second Auditor Number	N/A	

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
CP413 – English CP Template GM Foundation V2	Page 3	Report No. CN/SAS-286	Auditor: Barry Shi

Present at audit				
Name / Job Title				
Luo Wenhui/ System Engineer	x	x	x	x
Qiu Qingya/ QA Manager	x	x	x	x
Chen Shaohui/ Production Manager	x		x	x

Non-Conformity Summary Sheet

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

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

Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by
1	3.9.1	<p>The traceability system could not trace back to key material batch number which related with safety regulation.</p> <p>1) In injection process, the worker did not record the batch number of used plastic materials on site.</p> <p>2) The worker did not record the batch number of used printing inks in pad printing process.</p> <p>Remark: The plastic materials and printing inks should be compliance with relevant safety regulation such as EN71-3 and RoHS requirements.</p>					

Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document,	Date reviewed	Reviewed by

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com

					photograph, visit/other		
1	3.2.1	It was noted that no document number, issuing date and version number for parameter specification posted in injection workshop.					
2	3.5.1.1	The approved supplier list was not complete and updated. The adapter supplier i.e. Shenzhen City Tengshun Power Technical Co., Ltd was not listed on it and no approved and assessment records were provided for review.					
3	3.6.1	The work instruction posted in injection workshop does not define the matching formula including pigment, plastic materials.					
4	3.9.5	The factory tested the traceability system once per year and the last one was conducted on Jul. 15, 2020, but they did not measure and record the exercise time.					
5	3.11.3	The documented product withdrawal and recall procedure does not define a list of key staff and their responsibilities.					
6	4.8.1	The factory established the pest control procedure and					

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com

		kept inspection records. However, no number was marked for mouse baits and fly-killing lamps on site. Besides, the factory did not establish the pest control facility location map indicates the number likewise.					
7	4.9.1	It was noted that one lot of PCBA stored in warehouse was not protected by anti-static packages.					
8	5.1.2	IPQC criterion defines the patrol inspection should be conducted once per two hours and sampled 32pcs to check per time. However, the IPQC records on Mar. 13, 2020 for order No S218033 showed the inspector only checked 12pcs per time.					
9	6.1.1.6	Sampled 2# injection machine, the soliquid pressure setting was 95, but the parameter specification defines it for 65. Besides, the factory did not monitor it regularly.					

Comments on non-conformities

Nil

Voluntary Modules Non-Conformity Summary Sheet

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

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com

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

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

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com

Detailed Audit Report

1.	Senior management commitment
1.1	Senior management commitment and continual improvement
	<p>The company has obtained the ISO9001:2015 certificate, which issued by QAIC on Jul. 11, 2019 and until Jul. 10, 2022, Certificate no.: QAIC/CN/195119. BRCGS Manual (Doc.: BRC-QM-01, Rev: A/1, issue date: Mar. 29, 2020), quality policy, quality objectives and relevant BRCGS CP issue 4 GM procedures were established and implemented. The company's senior management Mr. Wu demonstrated that they are fully committed to the implementation of the requirements of BRCGS CP issue 4 GM and ISO9001:2015.</p> <p>The company undertakes a management review annually and the last on Jun. 10, 2020 and all the senior management team were in attendance, including the General Manager, management representative, engineering manager, QA (quality assurance) manager, production manager, purchase manager, sales manager, maintenance manager and HR manager. The management review contents are covered the quality management system implementation, quality and products safety and customer performance indicators, complaints, and feedback; incidents, non-conforming products and corrective actions; developments in legal requirements or scientific information associated with the products in scope and resource requirements.</p> <p>The quality and safety objectives of 2020 are established, and these objectives are monitored monthly with achievement records such as product qualified rate is above 98%; the product delivery timely rate is above 96% etc. The company has an original copy of the BRCGS CP GM issue 4 standards.</p>
1.2	Organisational structure, responsibilities and management authority
	<p>The organization structure chart is defined clearly at factory. The System Engineer Mr. Luo was clearly defined as the management representative to be responsible for BRCGS CP GM and QMS management system implementation. The QA Manager Mr. Qiu was identified with responsibility and authority to stop production.</p>
Non-applicable clauses	Nil

2.	Product risk management
2.1	Legislation and safety requirements
	<p>The company had established the product hazard analysis and control procedure (Doc.: BRC-QP-02, Rev.: A/1, issue date: Mar. 29, 2020) which defines the legislation and regulation management issue.</p>

<p>SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com</p>			
CP413 – English CP Template GM Foundation V2	Page 12	Report No. CN/SAS-286	Auditor: Barry Shi

	<p>The company obtained the legislations/ standards from clients, vendor and the third-party laboratory. The legislations regarding the products produced at the company were available, such as: ASTM F963, RoHS 2011/65/EU, EN71 and REACH requirements, etc.</p> <p>And related legislative and safety requirements, such as copies of updated regulations, products standards and product safety issues etc. were collected, maintained and provided for related staffs.</p>
2.2	<p>Product risk assessment</p> <p>The HACCP (Hazard Analysis Critical Control Point) records for pet products were provided for review and which covers each production process and the risk sources such as chemical, foreign objectives and product functions.</p> <p>And the CCPs (critical control points) includes: CCP1: Plastic material such as PP, ABS and printing ink should be compliance with RoHS, EN71-3 heavy metal content and REACH requirements. CCP2: No sharp edge and point for all products from injection moulding process. CCP3: Noise test should be in line with 80 decibels.</p> <p>There is a control team in place which is detailed in the documented control plan and the team includes: Quality Manager, Production Manager, Purchase and sale manager and HR manager.</p>
2.3	<p>Product labelling and claims</p> <p>The product labelling was designed by client and the requirements were determined and approved by customers during the sample submit stage, which covered the internal and outer packing. And the internal packing was included the operation instruction, warning sign and use site requirements.</p>
2.4	<p>Packaging Materials</p> <p>The packaging was assessed for fitness for purpose during the sample making stage and got the approval from customers before mass production. The factory would test it in third-party lab such as drop test, carton bursting test.</p>
Non-applicable clauses	Nil

3	Product safety and quality management
3.1	<p>Product safety and quality management system</p> <p>The company has established and implemented the documented quality and products safety management system in place, which is appropriate to the size of business and risk associated with the products against BRCGS CP GM issue 4.</p> <p>The quality and products safety procedures were established in the company, such as Document management procedure (Doc.: BRC-QP-04, Rev.: A/1, issue date: Mar. 29, 2020), Records control procedure (Doc.: BRC-QP-08, Rev.: A/1, issue date: Mar. 29, 2020), Management review procedure (Doc.: BRC-QP-01, Rev.: A/1, issue date: Mar. 29,</p>

<p>SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com</p>			
CP413 – English CP Template GM Foundation V2	Page 13	Report No. CN/SAS-286	Auditor: Barry Shi

	<p>2020), Non-conformance product procedure (Doc.: BRC-QP-07, Rev.: A/1, issue date: Mar. 29, 2020), Internal audit procedure (Doc.: BRC-QP-03, Rev.: A/1, issue date: Mar. 29, 2020) etc.</p> <p>Written instruction/ standards for all production processes were established such as each production instructions.</p>
3.2	Documentation control
	<p>The company has established the document management procedure (Doc.: BRC-QP-04, Rev.: A/1, issue date: Mar. 29, 2020), which is defined that all documents should be identified with a document number, version number, approval personnel and issue date. The documents and records control list were provided for review during audit.</p> <p>However, it was noted that no document number, issuing date and version number for parameter specification posted in injection workshop. Minor CAR 1 of 9 was raised.</p>
3.3	Record completion and maintenance
	<p>The company has established the records control procedure (Doc.: BRC-QP-08, Rev.: A/1, issue date: Mar. 29, 2020), which was required to any alterations should be authorised and recorded the justification for alteration. The original production records/ inspection records/ PO requirements and etc were collected and kept at the factory for 3 years for traceability purpose.</p>
3.4	Internal audit
	<p>The company has established the internal audit procedure (Doc.: BRC-QP-03, Rev.: A/1, issue date: Mar. 29, 2020). The last time internal audit for BRCGS CP4 was conducted on Jun. 4, 2020 with relevant records. All BRC CP4 clauses were covered and 2 NCs (non-conformances) were found and closed in time.</p>
3.5	Supplier approval and performance monitoring
3.5.1	Management of suppliers of raw materials, components and packaging
	<p>The purchase and supplier management procedure (Doc.: BRC-QP-05, Rev.: A/1, issue date: Mar. 29, 2020) was established and implemented at the company. The approval suppliers list was provided to review. The factory monitored each supplier monthly with records such as material/ component qualified rate, delivery timely rate etc.</p> <p>The approved supplier list was not complete and updated. The adapter supplier i.e. Shenzhen City Tengshun Power Technical Co., Ltd was not listed on it and no approved and assessment records were provided for review. Minor CAR 2 of 9 was raised.</p>
3.5.2	Control and acceptance of incoming raw materials, components and packaging materials
	<p>The main materials were plastic materials such as PP, ABS and electronic components. The sample plan and incoming materials inspection standard for materials and components were defined in IQC criterion clearly. The materials and components were checked against the standard MIL-STD-105E, Level II, AQL (Acceptable Quality Limit) =0/1.0/2.5 for Critical/Major/Minor).</p>

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com

	The plastic materials and electronic components supplier should provide RoHS and REACH compliance test report once per year.
3.6	Specifications and technical files
	<p>The specification & technical information for product were documented and kept in files. Sampled the products such as pet feeder, the complete documents such as order sheet, specifications and IQC samples were provided to review. It was easily accessed by relevant staffs.</p> <p>However, the work instruction posted in injection workshop does not define the matching formula including pigment, plastic materials. Minor CAR 3 of 9 was raised.</p>
3.7	Corrective and preventive action
	The company established the corrective and preventive action procedure (Doc.: BRC-QP-16, Rev.: A/1, issue date: Mar. 29, 2020) in place covering non-conformities relating to issues including internal audits, internal product non-conformities. The relevant corrective and preventive action records were properly kept in files.
3.8	Control of non-conforming materials
	The non-conforming product control procedure (Doc.: BRC-QP-07, Rev.: A/1, issue date: Mar. 29, 2020) was established and implemented at the company. The rejected products and materials were segregated and stored in the rejected boxes or designated areas in the workshop with identification.
3.9	Traceability
	<p>Product identification and traceability procedure (Doc.: BRC-QP-09, Rev.: A/1, issue date: Mar. 29, 2020) was established at the company.</p> <p>The incoming materials such as steel, aluminum tubes, semi-finished goods and all finished goods were identified with the labels with products PO# (Purchase Order) and manufactured date. And relevant production and inspection records were also indicated with the product PO# and manufactured date, order number for traceability. The factory tested the traceability system once per year including raw-material receipt to finished product and finished product to raw-material, the last one was conducted on Jul. 15, 2020. The detail is below: Product: AFP pitching toy for pet with 2,400pcs. Order No.: Order No. SL18036 for raw-material receipt to finished product and finished product to raw-material. Supposed quality issue: Sharp edges on products would hurt body. The relevant traceable records such as purchase records, IQC records, production plan, daily output records, ERP (Enterprise Resource Planning) data and information etc. were collected accordingly.</p> <p>The traceability system could not trace back to key material batch number which related with safety regulation.</p> <ol style="list-style-type: none"> 1) In injection process, the worker did not record the batch number of used plastic materials on site. 2) The worker did not record the batch number of used printing inks in pad printing process.

	<p>Remark: The plastic materials and printing inks should be compliance with relevant safety regulation such as EN71-3 and RoHS requirements. Major CAR 1 of 1 was raised.</p> <p>The factory tested the traceability system once per year and the last one was conducted on Jul. 15, 2020, but they did not measure and record the exercise time. Minor CAR 4 of 9 was raised.</p>
3.10	Complaint handling
	<p>Customer communication and complaint procedure (Doc.: BRC-QP-21, Rev.: A/1, issue date: Mar. 29, 2020) was established and implemented at the company. It was handled by the sales/Quality/production Departments, all the customers' complaints were logged, and root cause was investigated. The corrective & preventive actions were carried and followed up. Below customer complaint case was sampled: Complaint Case: The height of indicator light is not enough for pet feeders SL18042-3196. Complaint date: Apr. 14, 2020. Product: Pet feeders SL18042-3196. Completion date of corrective & corrective actions: Apr. 22, 2020. Relevant records such as correction and prevention reports were reviewed.</p>
3.11	Management of incidents, product withdrawal and product recall
	<p>Product recall control procedure (Doc.: BRC-QP-07, Rev.: A/1, issue date: Mar. 29, 2020) was established and implemented at the company. Annual product recall system test was planned and implemented accordingly. Last time was conducted on May 6, 2020. Product: AFP pitching toy for pet and 150pcs. Order No.: SL3196 Supposed quality issue: Pitching distance is not in line with standard requirement. The relevant recall documents (such as the notification to client, recall meeting, recall products disposal records, recall summary reports, etc.) were available, and the traceable records were collected accordingly.</p> <p>However, the documented product withdrawal and recall procedure does not define a list of key staff and their responsibilities. Minor CAR 5 of 9 was raised.</p>
Non-applicable clauses	
	Nil

4	Site Standards
4.1	External standards
	There are one 2-storey and one 3-storey (2 nd floor is used by company) production buildings on site. The gate house, fencing was in good condition. They are clean and tidy by site observation.
4.2	Security
	Visitor and security management procedure is established and implemented at the company, the security guards at the gatehouse are monitored the visitors.

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
CP413 – English CP Template GM Foundation V2	Page 16	Report No. CN/SAS-286	Auditor: Barry Shi

	The register sheet for visitors and vehicles are kept in files, also the visitor badges were issued to unauthorized visitors.
4.3	Layout, product flow and segregation
	Layout is adequate and production flow is smooth and reasonable for preventing product contamination and damage based upon on site observation.
4.4	Building interiors
	The internal site, buildings, and facilities are suitable for the intended purpose. The site is clearly defined and separated from any other external premises by wall. The grounds are maintained in acceptable condition mostly. The adequate lighting is provided for the warehouse and workshops.
4.5	Staff facilities
	The toilets and designed smoking areas are provided in the company, these facilities were isolated from the production and storage area. Forbid smoking warning was posted in the production areas. The rest area with personal locker was provided in production areas.
4.6	Housekeeping and hygiene
	The hygiene and cleaning plan regulation and clean plan was established and implement the company, which was required that the equipment, production and storage areas should be maintained in a state of cleanliness and clean frequency such as daily for workshop after working, once per month cleaning for ceiling.
4.7	Waste and waste disposal
	The general wastes are disposed by waste treatment centre of local environmental sanitation per day. The hazardous waste such as waste oil and ink wastes were disposed by licensed vendor Ningbo Beilun Environmental Solid Waste Co., Ltd.
4.8	Pest control
	<p>The internal pest control was conducted by the company. The fly-killer lamps and mouse baits were equipped on site. The factory checked them once per week with records. There was no negative evidence found on site.</p> <p>The factory established the pest control procedure and kept inspection records. However, no number was marked for mouse baits and fly-killing lamps on site. Besides, the factory did not establish the pest control facility location map indicates the number likewise.</p> <p>Minor CAR 6 of 9 was raised.</p>
4.9	Product storage, dispatch and transport
	<p>The storage areas of incoming materials/WIP/finished goods are adequate and in clean condition. Mostly items were protected and stored in good condition.</p> <p>It was noted that one lot of PCBA stored in warehouse was not protected by anti-static packages.</p> <p>Minor CAR 7 of 9 was raised.</p>

Non-applicable clauses	Nil
------------------------	-----

5	Product Inspection and Testing
----------	---------------------------------------

5.1	Product inspection and laboratory testing
-----	---

There were 3 inspectors to conduct the IQC (incoming quality control) and IPQC (in-line product quality control) and FQC (final quality control). The inspection instruction and standards for IQC/IPQC/FQC and sample plan were documented, which included inspection item, defect classes, sample plan MIL-STD-105E, Level II, AQL= 0/1.0/2.5 for Critical/Major/Minor.

The quality control staffs were qualified and trained, and competent to their jobs. The training plan of 2019/2020 and training records showed that the QA workers and test workers were regularly trained by QA manager.

The incoming materials are inspected or tested by IQC according to IQC inspection instruction. The IQC inspection and test records are kept in files.

Inspections in processes are carried out via the first piece approval and patrol inspection according internal product control plan. Besides, 100% visual and function checking on assembly line before packing.

The basic test items such as rubber hardness, sharp edge, small part, hi-pot test for adapter could be conducted on site.

However, IPQC criterion defines the patrol inspection should be conducted once per two hours and sampled 32pcs to check per time. However, the IPQC records on Mar. 13, 2020 for order No S218033 showed the inspector only checked 12pcs per time.
Minor CAR 8 of 9 was raised.

5.2	Quantity control
-----	------------------

The company has operated a quantity control system which conforms to the legal requirements in the country where the product is sold and any additional customer requirements. First article approval and process patrol inspection and final inspection were planned and conducted to check the quantity.

5.3	Product sample control
-----	------------------------

The approved samples were registered and kept in the quality department at the company. Production retained samples are approved by QA department before retention and retained in samples room for at least 3 years. The packing wordings were provided by client and gathered accordance with the legal requirements in the country of sales.

Non-applicable clauses	Nil
------------------------	-----

6	Process Control
----------	------------------------

6.1	Control of operations
-----	-----------------------

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
CP413 – English CP Template GM Foundation V2	Page 18	Report No. CN/SAS-286	Auditor: Barry Shi

6.1.1	Process risk assessment
	<p>For process risk assessment, the company assessed them from each production process including material, manpower, operation and inspection process, machine and environment. The detail is: Injection moulding: Parameter specification control such as temperature, pressure. Sharp tool control such as trimming blade used on site. No edge point or edge on product surface. Pad printing: Colour evaluation and printing adhesion test by 3M tape. Assembly and packing: 100% appearance and function inspection on-line which including noise test for pet products.</p> <p>Sampled 2# injection machine, the soliquid pressure setting was 95, but the parameter specification defines it for 65. Besides, the factory did not monitor it regularly. Minor CAR 9 of 9 was raised.</p>
6.1.2	Line clearance and in-process checks
	<p>First article approval and patrol inspection were planned and conducted in place. The line clearance was required before the start of next production order such as change work instruction before changing product on-line.</p>
6.2	Equipment and equipment maintenance
	<p>The company has established the machine and equipment maintenance schedule and machines were adequate and suitable for products manufacturing. There were 2 maintenance technicians in the machine maintenance departments. The machines were correctly maintained with maintenance records.</p>
6.3	Product contamination control
6.3.1	Identification and prevention of risk of product contamination
	<p>For process risk assessment, the company assessed them from each production process including material, manpower, operation and inspection process, machine and environment. The detail is: Injection moulding: Parameter specification control such as temperature, pressure. Sharp tool control such as trimming blade used on site. No edge point or edge on product surface. Pad printing: Colour evaluation and printing adhesion test by 3M tape. Assembly and packing: 100% appearance and function inspection on-line which including noise test for pet products.</p>
6.3.2	Chemical and biological control
	<p>The main chemicals were lube oils and printing inks. The factory set specific chemical warehouse on site. The secondary containment and explosion proof lamp were equipped on site. MSDS (Material Safety Data Sheet) also was provided for reference.</p>
6.3.3	Metal control
	<p>The metal sharp tool control regulation (Doc.: BRC-WI-01, Rev.: A/1, issue date: Mar. 29, 2020) was established in the company. The snap-off blades were not allowed to use</p>

	on site. The factory kept sharp tool distributing and recall records. All sharp tools such as scissors and blades should be tied on site.
6.3.4	Glass, brittle plastics, ceramics, wood and similar materials control
	The company has established the glass article, brittle article, and metal foreign body control policy which are defined in the potential contaminant risk from glass, brittle plastic, ceramics, wood and similar materials, and how to control in different processes. No this risk was found during audit.
6.3.5	Foreign body detection and removal equipment
6.3.5.1	Filters and sieves
	One sieve with magnet was equipped in feeding barrel for injection moulding machine in order to filter foreign objectives. The workers checked it when changing products and materials to ensure in good condition.
6.3.5.2	Metal detectors and x-ray equipment
	Metal detectors and x-ray equipment were not applicative for the company.
6.3.5.3	Magnets and optical sorting equipment
	One sieve with magnet was equipped in feeding barrel for injection moulding machine in order to filter foreign objectives. The factory provided the magnet inspection records for review.
6.4	Calibration and control of measuring and monitoring devices
	The measurement and test equipment control procedure (Doc.: BRC-QP-13, Rev.: A/1, issue date: Mar. 29, 2020) and calibration plan list were established and implement at the factory, all the measurement and test equipment such as electronic balances, pull testers were calibrated by 3 rd party with reports.
6.5	Final product packing and control
	The packing sample was provided on site. The workers could operate the packing machine according to WI correctly.
6.6	Stock control and product release
	The materials and components such as metal parts were purchased according PO#; the warehouse could not distribute them before inspection. The finished products should be checked by FQC before shipment.
Non-applicable clauses	6.3.5.2

7	Personnel
7.1	Training and competency

SGS United Kingdom Limited 217-221 London Road, Camberley, GU15 3EY, Tel 01276 697854 E-mail globalbrc@sgs.com			
CP413 – English CP Template GM Foundation V2	Page 20	Report No. CN/SAS-286	Auditor: Barry Shi

	The training plan for 2020 was provided for review, internal and external training records were kept in files. Induction training was given to all new workers which includes quality, H&S and hygiene, this training is repeated annually.
7.2	Protective clothing
	No jewelry was permitted in production area. No protective clothing was required for all workers based on risk assessment reports review and site observation. The electrostatic ring was worn by workers who contacted PCBA.
7.3	Hygiene practices
	The washing facility was equipped in the toilet, and the workers could wash their hand before working. Smoking was not permitted throughout the production and warehouse buildings. Eating and drinking were permitted in rest area.
Non-applicable clauses	Nil