

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

| 1. Audit Summary            |   |                   |           |
|-----------------------------|---|-------------------|-----------|
| Company name                | Rukhm Industries Limited  | Site code         | 10019753  |
| Site name                   | RUKHM INDUSTRIES LIMITE   |                   |           |
| Scope of audit              | Processing (cleaning, sorting, de-husking, grinding, winnowing, blending, metal separation) of Psyllium seed, psyllium husk and psyllium powder; packing in Paper bag and PP bag. |                   |           |
| Exclusions from scope       | None  |                   |           |
| Justification for exclusion | NA  |                   |           |
| Audit start date            | 6/12/2025   | Audit finish date | 6/13/2025 |
| Re-audit due date           | 6/12/2026   | Head office       | No        |

| Additional modules included |        |       |                       |
|-----------------------------|--------|-------|-----------------------|
| Modules                     | Result | Scope | Exclusions from Scope |
|                             |        |       |                       |

| 2. Audit Results           |              |             |                         |                 |           |
|----------------------------|--------------|-------------|-------------------------|-----------------|-----------|
| Audit result               | Certificated | Audit grade | A                       | Audit programme | Announced |
| Previous audit grade       |              |             | Previous audit date     |                 |           |
| Certificate issue date     | 7/24/2025    |             | Certificate expiry date | 7/24/2026       |           |
| Number of non-conformities |              |             | Fundamental             | 0               |           |

|                        |               |              |          |              |  |
|------------------------|---------------|--------------|----------|--------------|--|
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| 2. Audit Results |          |   |
|------------------|----------|---|
|                  | Critical | 0 |
|                  | Major    | 0 |
|                  | Minor    | 8 |

| 3. Company Details             |   |                       |                            |
|--------------------------------|---|-----------------------|----------------------------|
| Site address                   | VILL BHOJO KI BAP, CHAK NO. 2,, K.N. 25/13, 25/15, 25/24, 25/22 KUL RAKBA<br>43.00 BIGHA<br><br>JODHPUR<br><br>342307 |                       |                            |
| Country                        | INDIA   | Site telephone number | +91 9004608833             |
| Commercial representative name | Gopal Bhatler   | Email                 | rukhimindustries@gmail.com |
| Technical representative name  | Gopal Bhatler   | Email                 | rukhimindustries@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              | General (9.00-18.00) |                  |      |                    |     |
| Seasonal site              | No                   |                  |      |                    |     |

|                        |               |              |          |              |
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**4. Company Profile**

|   |   |  |
|---|---|--|
| Seasonal opening times (Start/end date) |   |  |
| Other certificates held                 | Kosher & Halal  |  |
| Outsourced processes                    | No  |  |
| Outsourced process description          | NA  |  |
| Regions exported to                     | Asia  |  |
| Company registration number             | FSSAI: 12224032000194, central license for the scope of manufacture - valid till dtd. 03.04.2029. |  |
| Major changes since last BRCGS audit    | NA-This is the first audit.   |  |

**Company Description**

M/s Rukhm Industries Limited is a Psyllium products processing company. It is a typical Agro Commodities company in its segment from 2024 onwards. Audited unit is located at the BAP in state of Rajasthan, India.

Key process are Processing (cleaning, sorting, de-husking, grinding, winnowing, blending, metal separation) of Psyllium seed, psyllium husk and psyllium powder; packing in Paper bag and PP bag.

The present staff strength is 16 members and working in the general shift – as required.

Unit is constructed approx. 3500 mt. sq. Organisation follows the applicable legal requirements.

Organization follows applicable legal requirement:

- Factory Registration:- UDYAM registration: UDYAM-MH-19-0081971, dtd. 08.12.2024.
- FSSAI: 12224032000194, central license for the scope of manufacture - valid till dtd. 03.04.2029.
- Import and export code:- AALCR1539F, dtd. 11.03.2024.
- W&M legal metrology - certificate # 2549359/RAJ/2025/01 – valid till dtd. 12.04.2026 for weighing scale.

**5. Product Characteristics**

|                        |               |              |          |              |
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| 5. Product Characteristics                      |    |  |    |                   |    |
|---|----|--|----|-------------------|----|
| Product categories                              |    | 15 - Dried food and ingredients  |    |                   |    |
| Finished product safety rationale               |    | Products are agro based dried products with long shelf life of 36 months due to specified low moisture level; kept as less than 12% maximum as depending on product variety. No addition of any other chemical or ingredient in this.  |    |                   |    |
| High care                                       | No | High risk  | No | Ambient high care | No |
| Justification for area                          |    | The finished product used as ingredient in food industry. Products are long shelf life due to specified maximum moisture level depending on product variety. Product stored at ambient temperature. Only low risk principles & enclosed area are applicable as per product type & processing methods for area. |    |                   |    |
| Allergens handled on site                       |    | None   |    |                   |    |
| Product claims made e.g. IP, organic            |    | HALAL, KOSHER  |    |                   |    |
| Product recalls in last 12 months               |    | No   |    |                   |    |
| Products in production at the time of the audit |    | Psyllium husk 85% Batch no. 23/016.  |    |                   |    |

| 6. Audit Duration Details                                     |      |  |   |
|---|------|--|---|
| Total audit duration  | 18   | Duration of production facility inspection | 9 |
| Reasons for deviation from typical or expected audit duration | NONE |  |   |
| Combined audits   | None |  |   |

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**6. Audit Duration Details**

|                          |           |
|--------------------------|-----------|
| 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)

| Name            | Job title          | Opening meeting | Site inspection | Procedure review | Closing meeting |
|-----------------|--------------------|-----------------|-----------------|------------------|-----------------|
| Bhamraj Bhatler | Managing Director  | X               |                 |                  | X               |
| Gopal Bhatler   | FSTL/Director      | X               | X               | X                | X               |
| Monika Bhatler  | Production Manager | X               | X               | X                | X               |
| Sonia Bhatler   | QC Incharge        | X               | X               | X                | X               |
| Tarsemlal       | Maintenance        | X               |                 |                  | X               |

**GFSI Post Farm Gate Audit History**

| Date      | Scheme/Standard                | Announced/Unannounced | Pass/Fail |
|-----------|--------------------------------|-----------------------|-----------|
| 6/12/2025 | BRCGS Global Food Standard 9.0 | Announced             | Pass      |

**Document control**

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| Certification Body     |  |                     |            |
|------------------------|--|---------------------|------------|
| ALCUMUS ISOQAR Limited |  |                     |            |
| 1 Blackmore Road       |  |                     |            |
| UNITED KINGDOM         |  |                     |            |
| CB Report number       | BRF-25950-01                           |                     |            |
| Template Name          | F908 Food Safety Audit Report Template |                     |            |
| Standard Issue         | 9                                      | Template issue date | 12/16/2022 |
| Directory allocation   |  | Version             |            |

|                        |               |              |                       |
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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 |
|--------|--------|------------|---------------------------------|---------------------|---------------|-------------|
|        |        |            |                                 |                     |               |             |

|                        |               |              |          |              |  |
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| Minor  |  |   |  |   |               |              |
|--------|--|---|--|---|---------------|--------------|
| Clause | Detail   | Correction  | Proposed preventive action plan  | Root cause analysis   | Date reviewed | Reviewed by  |
| 1.1.2  | During interviews it was observed that 03 staff members were not found aware about current food safety & quality culture plan & targets. | Training for Food safety & Quality control plan is provided to staff. | We will again provide training for the Food safety and Quality control plan to staff members to avoid such in future   | Although training for the same is already provided but due to lack of awareness and lack of training to the changing staff it happened. | 7/10/2025     | Prachi Patel |
| 2.1.1  | HACCP knowledge found not up to the mark for dispatch section staff.   | Training for Haccp Knowledge is provided to staff.                    | We will again provide training for the Haccp Knowledge to staff members to avoid such in future  | Although training for the same is already provided but due to lack of awareness and intimation from the key members it happened.        | 7/10/2025     | Prachi Patel |
| 3.9.2  | Identification of the semifinished goods found missing a few areas.  | Identification is now placed on the lot.                              | Identification label for Semi-finished goods is placed back on the lot and instruction are provided to the cleaning staff to no remove the label at the time of cleaning | Although identification mark is placed on the lot but it was accidently removed at the time of cleaning by cleaning staff               | 7/10/2025     | Prachi Patel |

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| Minor  |   |   |   |   |           |              |
|--------|---|---|---|---|-----------|--------------|
| 4.4.8  | Door gap observed at the dispatch section.  | Proper sealing is now done of the at door.  | We will fill the gap of the door at the dispatch Section to avoid contamination.  | As it was under planning for fixing the gap but due to excessive work load it was not completed on time.  | 7/10/2025 | Prachi Patel |
| 4.7.3  | Temporary cello taping used on piping section.  | Temporary maintenance on the pipes is immediately removed. And permanent maintenance work is been carried out | Instructions are provided to the maintenance team to immediately remove the plastic tape from the elevator pipes and to not repeat the same in future; Also we will have some extra parts in spare to avoid such in future. | As some maintenance work was required and parts were not available from the supplier so temporary maintenance has been carried out to avoid further failure in machine, so it happened. | 7/10/2025 | Prachi Patel |
| 4.12.2 | It was found that bags for rejection/wastage are not found of different colour or type from product packaging bags. | Yellow colour bags is been purchased and is in use. Photograph is attached.                                   | Instructions are provided to our purchase team to immediately avail the Yellow colour bags as waste bags from supplier.   | As colour coding for bags is already carried out with yellow colour bags for waste material but due to unavailability of the required amount of bags from the supplier it happened.     | 7/10/2025 | Prachi Patel |
| 4.15.1 | Some of packing material found kept on the floor  | All the packing material is placed on stand staff is trained through the BRC                                  | we will remove all the packing material kept on floor and will place it in a proper way, away from the  | Due to excess amount of the material it happened.   | 7/10/2025 | Prachi Patel |

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| Minor |  |   |  |   |           |              |
|-------|--|---|--|---|-----------|--------------|
|       |  | NCR closure training. Photograph is attached  | walls as per the standard and will train our staff for the same  |   |           |              |
| 7.2.1 | Jewellery control not found effectively practiced as one of the staff members found with the hand jewellery. | Instructions is been provided to the staff members also jewellery is immediately removed and training is provided through BRC NCR closure training. | It was immediately removed and instruction is been provided to the staff member to not to repeat the same. | It was happened unknowingly by the staff member , Lack of awareness , frequent trainings and supervision. | 7/10/2025 | Prachi Patel |

| Comments on non-conformities |
|------------------------------|
|                              |

|                             |               |              |          |              |
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| 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 |
|        |        |            |                                 |                     |               |             |

|                        |               |              |          |              |  |
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| Lead auditor   |              |             |
|----------------|--------------|-------------|
| Auditor number | First name   | Second name |
| 37460          | Prachi Patel | Patel       |

| Audit team |             |                |              | Attendance<br>(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 |
| Prachi     | Patel       | 37460          | Lead Auditor | 2025-06-12                           | 08:45      | 18:45    | Physical           | 37460                           |
| Prachi     | Patel       | 37460          | Lead Auditor | 2025-06-13                           | 09:33      | 18:30    | Physical           | 37460                           |

|                        |               |              |          |              |
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## Detailed Audit Report

### 1. Senior management commitment

Food safety policy & Quality policy is documented as PS/01/F & PS/01/Q respectively dated 01.01.2025. Policy shows management commitment to meet legal & customer requirements. Interviewed Mr. Bhomraj Bhattar (MD), Mr. Gopal Bhattar (Unit Head / FSTL) for their understanding of the system & it was good.

Food Safety & Quality culture plan is documented in line Food safety & Quality Culture Policy dated 01.01.2025. Reviewed annually as per risk assesment. It is designed for FY 2025 at present. Key performance indicator/targets are defined with responsibilities of dept. as- PS/16 dated 01.01.2025. Monitoring record is evident as per frequency 03 monthly. Last status was checked on date 22.05.2025.

- Surveys are carried out as per survey report- PS/16. Last done in month of May-2025 for all employees individually. It was done on date 14.05.2025. Total questions in surveys were 15 in number. Score rating is given as 1 to 7 for each question, 7 as highest rating & 1 is least. Action plan is documented. Food safety trend analysis is evident- PS/17 is evident. Analysis & food safety culture calculation record is evident. Food safety culture training was given on date 19.06.2025 for 02 Hrs to Workers & Staff member by External Consultant.

Quality objectives have been defined in line with the Quality & Food safety as FSR/MNG/04 period of objective 01.01.2025 to 31.12.2025. In Total 03 objectives are established for Quality & food safety. Objectives are reviewed on monthly basis in team meetings. Last reviewed on 29.03.2025 E.g.

- Number of Customer complaints for Food safety & Quality related- Nil in a year. Status- Nil.
- Training for food Safety & Hygiene- Target 800 man Hours. Status- 390 Man Hours given.
- Zero Breaches in Hygiene Practice- Status- Nil.

Ref. Monitoring record- FSR/MNG/04.

Management review is carried out on 06 monthly frequencies. Agenda points are 11 in number & covered all the requirements given in BRC standard- FSR/MNG/02. Management review covers agenda which includes internal, second party and third party audits; previous management review points, action plans and time frames; customer performance indicators; complaints and feedback; Process performance, Incidents & Product recall, corrective actions, out-of- specification results and non-conforming materials; process performance and deviation from defined parameters; reviews of the HACCP-base system and reporting it to the Top management. Last management review was done on 25.05.2025. Management review was headed by Top management & all Sr. Managers participated in the meeting. Meeting attendance sheet is evident. Management output is recorded. Ref. Minutes of meeting- FSR/MNG/03.

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Monthly meeting record format is available as- FSR/MNG/03A. Monthly meeting was done on dtd. 23.05.2025, 19.03.2025, 22.02.2025, 18.01.2025.

However, Minor NCR – 1 is raised in this audit as [1.1.2]: During interviews it was observed that 03 staff members were not found aware about current food safety & quality culture plan & targets.

•Confidential reporting system is in place to report concerns relating to product safety, integrity, quality and legality- Whistle blower Policy- PS/01WH dated 01.01.2025. It was checked during course of audit. Verified on display one land line telephone number for office. Suggestion box is provided for any anonymous complained & monitoring record is evident as- FSR/PRD/41. Checked for May – June 2025 as on date. Confidential reporting training was given on date 18.06.2025 for 02 Hrs to Workers & Staff member by External Consultant.

Resources are provide as per industrial practices & requirements for this type of product manufacturing units. M/s Rukhm Industries Limited is a Psyllium products processing company. It is a typical Agro Commodities company in its segment from 2024 onwards. Audited unit is located at the BAP in state of Rajasthan, India.

Key process are Processing (cleaning, sorting, de-husking, grinding, winnowing, blending, metal separation) of Psyllium seed, psyllium husk and psyllium powder; packing in Paper bag and PP bag.

The present staff strength is 16 members and working in the general shift – as required.

Unit is constructed approx. 3500 mt. sq. Organisation follows the applicable legal requirements.

Organization follows applicable legal requirement:

- Factory Registration:- UDYAM registration: UDYAM-MH-19-0081971, dtd. 08.12.2024.
- FSSAI: 12224032000194, central license for the scope of manufacture - valid till dtd. 03.04.2029.
- Import and export code:- AALCR1539F, dtd. 11.03.2024.
- W&M legal metrology - certificate # 2549359/RAJ/2025/01 – valid till dtd. 12.04.2026 for weighing scale.

Other certificate:- N/A

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Key High-lights for COVID-19 Threats: Ref. SOP for handling COVID-19 issue is documented as- SP/31 dated 01.01.2025. Resumption of Work Plan & actions are supported by Work Instructions, displays on COVID-19 control instructions. Action plan is developed & established as per submitted documents.

Senior Management receives mails & communication from all these boards on regular intervals related with the food safety, legality & quality related issues. Company has hired external services from external Consultant for providing any information related with Quality & Food safety issues.

Company has an original copy of BRC Food issue 9.0 standards.

This is first BRCGS audit for this site.

Unit Head & Senior managers attended both opening and closing meeting. Departmental Managers from Quality, Production & Maintenance were also available during round of facility and auditing and attended opening & closing meeting.

Logo is used in emails only as per guidelines.

Organization structure chart is evident- Annexure 01, dated 01.01.2025. Team is headed by the Top management Mr. Bhomraj Bhattar (MD) & Mr. Midut Golcha (Unit Head-FSTL), Mr. Harish Chandak (QC/D-FSTL) reporting to him.

Job specifications & descriptions are defined in the BRC manual as- FSR/MNG/12 dated 01.01.2025. Verified R&A for Plant Head, FSTL, Purchase In-charge, Marketing In-charge, Store In-charge, Production In- charge, Production Head, Packing & Dispatch in-charge, QA In-charge.

Authority Absence arrangements are done & recorded in the documents.

Employees are found aware of their responsibilities. Responsibility matrix & skill matrix is evident as FSR/HR/02 dated 01.01.2025.

| Details of non-applicable clauses with justification |  |
|--|--|
| Clause/Section Ref                                   | Justification  |
| 1.1.10   | This is First certification for the company against BRC food standard 9.0. |

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|        |  |
|--------|--|
| 1.1.12 | This is First certification for the company against BRC food standard 9.0.                   |
| 1.1.13 | LOGO is not used. This is First certification for the company against BRC food standard 9.0. |

| 2. The Food Safety Plan – HACCP  |  |
|--|--|
| <p>HACCP studies are carried out &amp; documented. HACCP system is fully implemented and effective food safety plan based on Codex Alimentarius HACCP principles.</p> <p>01 HACCP studies are carried out &amp; documented for single products. HACCP plans are there</p> <ul style="list-style-type: none"> <li>•For psyllium seeds, Psyllium Husk and Psyllium husk powder.</li> </ul> <p>Scope is defined in BRC Manual Ref. no. SM/BRC/01 dated 01.01.2025 i.e. Processing (cleaning, sorting, de-husking, grinding, winnowing, blending, metal separation) of Psyllium seed, psyllium husk and psyllium powder; packing in Paper bag and PP bag.</p> <p>Last review was done on date 01.01.2025.</p> <p>HACCP team is established. PS/02 dated 01.01.2025. Team is consisted of 07 members. Qualification &amp; experience of the team is defined. This is a multidimensional team. FSTL is Mr. Gopal Bhattar- is Graduate with 04 years' experience. He has good in same industry. He is reporting to Top management.</p> <p>Training records are available for team members for BRC Awareness/HACCP.</p> <ul style="list-style-type: none"> <li>•BRCGS &amp; HACCP training was given on date 11.01.2025 &amp; 02.04.2025 for 06 &amp; 04 Hrs respectively to FST &amp; Staff member by External Consultant.</li> </ul> <p>However, Minor NCR – 2 is raised in this audit as [2.1.1] HACCP knowledge found not up to the mark for dispatch section staff.</p> <p>Responsibility matrix &amp; skill matrix is evident as FSR/HR/02 dated 01.01.2025.</p> <p>Product Description evident Ref. PS/03 dated 01.01.2025. Verified for psyllium products.</p> |  |

|                        |               |              |          |              |
|------------------------|---------------|--------------|----------|--------------|
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Finished product specification in product data sheet / product description: the data specifications are maintained and the copies are shown during the audit. All products as raw material and packing material is being handled.

- Checked for the same for the product and packing material during the HACCP and traceability study.

It covers the requirement as organoleptic / Gn. Characteristics, chemical and microbial etc. - as per the product requirement and buyer requirement.

Annual review and update done on the same – specification Product Data Sheet / product description: review in HACCP as on dtd. 19.04.2025.

- Product Description evident Ref. PS/03 dated 01.01.2025. Verified for Psyllium seed, psyllium husk and psyllium powder.

F/G specification PS-03: [For All products -etc.]

- Shelf life = 24 years for all products.
- Pack = primary pack = Paper bag and PP bag - as required.
- Intended use = use for food ingredient – as food for human consumption.

RM specification: PS/03-RM [all Raw material] – covering the Gn. Characteristics.

Specification for P/M – as PS-03- Paper bag and PP bag – as per the customer requirement

Full description of the products is developed including detail of ingredients and their origin, packaging and delivery methods, packaging material configurations, finished goods specifications, storage requirements, shelf life, preparation requirements before use, distribution control, labelling requirements and acceptance criteria.

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The raw material specifications have been documented, which mentions the physical conditions of the raw material like odour, texture, Microbiological standards, etc. Micro parameters like TPC, Coliform, Salmonella. Company has defined product description for all groups of the products.

Shelf life of the all products is 24 months, storage condition is ambient, and primary packing material is Paper bags and PP bags. Method of preservation is maintaining moisture level.

Intended uses of product have been identified & properly described. The product is to be used as ingredient, as a food supplement, as a dietary fiber and as ingredient in Nutraceutical industries as per customer requirements. Intended for General consumer of all age group.

No allergen is processed in this site as per company policy now. No claim for product suitability for consumer target groups or vulnerable groups of population.

Products are not allergic for specific groups as per documented information. No allergen handled in RM or in Finished products at this site as per management policy.

Flow diagram was available for all process and was found proper- PS/04. Process flow diagram is verified by HACCP team yearly or during any change, record was verified dated 01.01.2025. Site has not completed the on-site process flow diagram verification for packing line process as per annual frequency. Last on-site verification was done dated 19.04.2025.

Company is procuring raw materials from approved and selected suppliers from domestic market as well as overseas supplier. Raw material further subjected for processing which includes for Cleaning, Sorting, Grinding/ De husking, Gravity separator, Winnowing, Blending, Metal Detection, packing & dispatch as per specification required and used for further processing. The major processes involved are established.

No vacuum packing is done presently.

Hazard analysis is documented on date 01.01.2025 as- PS/05. Last review was done on date 19.04.2025. The company ensures that the HACCP study is based on comprehensive information, which is referenced and available.

All relevant information needed to conduct the hazard analysis is collected, maintained, documented and updated. The company ensures that the HACCP plan is based on comprehensive information sources, which are referenced and available. This includes the latest scientific literature, historical and known hazards associated, recognised guidelines & regulations as USFDA, EU regulations, Competent Authority guidelines, food safety legislation of products in destination countries and customer requirements.

Probability of hazards occurrence & Severity was calculated through means of evaluation by 1-5 rating scale.

POC: High Probability of Occurrence means- 5 or 4, Medium- 3, Low- 2 or 1.

Severity: Critical means- 5, Serious severity means- 4, Major-3, Minor- 2 or 1.

Risk is calculated by means of multiply (POC\*Severity). RPN no. =>9 for significant hazards.

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Hazards considered were biological, chemical, physical & Allergens.

If equal or more than 09 then hazard was considered as significant & Significant hazards are assessed again as per CCP decision tree on 05 questions.

HACCP decision tree is also used to check for significance & decision for CCPs. It is done as Codex Alimentarius guidelines for HACCP. Control measures are established, evaluated & documented in Hazard analysis study. For each hazard that requires control, control points are reviewed to identify those that are critical. This is based on a logical approach and is facilitated by use of a decision tree. Details of application of CCP decision tree on identified significant hazards were there in place.

01 CCP is identified through hazard analysis- Ref. HACCP Plan PS/08 dated 01.01.2025.

- CCP -1: Metal detector / separator [P] for all products: CL = Fe: 2.5 mm, N-Fe = 3.0 mm, SS = 4.0 mm, Monitoring frequency is to check the same before, during and after every lot – by operator. Corrective action as – check the proper calibration and reject the material if found deviated.
- Rec. FSR-PRD-08 for product Psyllium Husk Powder, dtd. 18.05.2025, batch # PP/E18/25 mentioned in the record – verified the same in the system as for Psyllium Husk powder.
- No CCP related deviation reported as on.

Validation:

The HACCP food safety team has conducted validation for the CCP- Validation reports- PS/09.

- Validation and Calibration test done by manufacturer for Metal Detectors & metal probes pieces evident as provided by PTCC/2504/016 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- Magnet on-line. Certificate no. PTCC/2504/015 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- Sieve Calibration - PTCC/2504/012 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- Moisture meter - PTCC/2504/013 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- W&M legal metrology - certificate # 2549359/RAJ/2025/01 – valid till dtd. 12.04.2026 for weighing scale.

The monitoring procedure is established for CCP and monitoring system is capable of detection of deviations and provides information to take corrective action. CCP deviation check record for every batch

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is evident and reviewed by HACCP team on monthly basis. No deviation is observed in the CCP since last one year as per company records.

Corrective action plan are established as: HACCP Plan- PS/08 dated 01.01.2025. E.g.

CCP-01- Immediate actions- Re-process & pass the material though metal detector again. Discard final rejection. Preventive- Effective cleaning/Calibration of Metal detector.

Procedures of verification is established to confirm that the HACCP plan is effective in the form of internal audits, frequency is at an interval of 06 months), review of CCP records on a daily basis, review of customer feedbacks including complaints. Documentation and record keeping is sufficient to assist the company to verify that the HACCP controls are in place and maintained. HACCP Review frequency is at least once in a year. The HACCP plan was reviewed last on 19.04.2025 having frequency once in a year or any changes. No changes since last review. The HACCP flow diagram is verified on yearly basis or if any changes happens.

| Details of non-applicable clauses with justification |               |
|--|---------------|
| Clause/Section Ref                                   | Justification |
| None   |               |

### 3. Food safety and quality management system

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

BRC Manual & documentation is with HACCP plan as evident in BRCGS manual SM/BRC/01 Issue 9.0 rev.00 date 01.01.2025. Last changes were made to incorporate new BRCGS standard 9.0 requirements in the BRCGS manual & HACCP plan manual was revised on date 01.01.2025.

Manual is approved by Top management. It is prepared by FSTL. Other documents including Level 2 SOPs. List of procedures includes SOPs & SSOPs. Level 3 are work instructions & Level 4 are formats/ records. SOPs are distributed to related departments. Work instructions are displayed at relevant locations. There are displays of various procedures, do's & don'ts in pictorial & written forms in English and local language / Gujarati at various locations of the production area, walk ways, laboratory.

Procedure for document control- SP/01 dated 01.01.2025 is addressed in BRCGS manual Issue 9.0 date dated 01.01.2025 as per Control & distribution system for documents is given in master list of documents. Key documents are BRCGS manual, Quality/Food safety Procedures, Quality plan, External standards documents, Formats, Work Instructions, Specification sheets, Reference documents, Customer related

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documents. Company will review the latest version of the documents once in a year or as & when required.

List of Quality & safety procedure- FSR/MNG/01. Updated 2025.

Master copy stamp is evident on Master document controlled by FSTL. Change note is recorded in BRC manual as "REVISION HISTORY".

Change/amendment control is defined in documents. Ref. Document change & request form- FSR/MNG/14. Last changes were made to incorporate new products in the BRC manual & HACCP plan manual was revised on date 01.01.2025.

An updated master list of all documents & formats is available.

Records are legible and detailed in English language. Records are available, maintained in good conditions & retrievable as per Procedure for Document Control SP-02 issue 00 rev00 dated 01.01.2025. Records are legible and detailed in English language. Records are retained as per defined retention time. Quality record retention time is 05 years min.

### 3.4 Internal audits

Procedure for Internal audit- SP/03 issue 00 dated 01.01.2025 is evident. The frequency of the Internal audit is once in 03 months. The internal audits are conducted by Internal approved auditors.

Internal audit frequency is on monthly basis as divided in for whole year 2025 on department/activities basis. All activities and areas like Production, RM store, General Store, Dispatch section, quality control, Maintenance, PRPs, HACCP, management Commitment are covered. The scope of the internal audit programme covers HACCP/Food safety plan, PRPs, Food defence & Food fraud prevention plan & process implementation etc.

I/A risk assessment is to be done on the 4 attributes as legal requirement, industry requirement, customer requirement, non-conformity raised in previous requirement. Scale 1 to 5. Justification note: for the frequency-

- 1 to 10 = annually
- 11 to 15 = twice in a year
- 16 to 20 = thrice in a year

Risk assessment for year 2025 is available & audits completed as per risk assessment result & plan.

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A documented Internal audit yearly plan is available- FSR/MNG/06 for year 2025.

I/A audit plan MNG/09: Last Internal audits were performed on dates 05.02.2025, 06.02.2025, 06.03.2025, 03.04.2025, 10.04.2025, 06.05.2025, 03.06.2025.

Auditors are independent & trained. Record evident as- FSR/MNG/14.

Internal audit summary report- FSR/MNG/07 is evident. Internal audit non- conformance report is evident- All the compliance and non-compliance included in the audit FSR/MNG/08. Root cause, corrective action, verification processes are recorded in the format. Total of 04 Non-conformances were raised in the last Internal audits for year 2024 as on date.

Hygiene Audits/Inspections to be carried out on daily/monthly basis in respective areas. Verified the GMP checklists and records to be perform on monthly basis: Monthly GMP audit was performed on date 26.07.2024, 28.06.2024, 30.05.2024 as per record no. FSR/MNG/09.

Cleaning performance is checked before starting production in each shift by supervisor and verified by QC in charge. FSTL & QC persons are authorised to verify the cleaning status & checks on daily basis.

Daily Plant Cleaning Record- FSR/PRD/18

Daily Machine cleaning- FSR/PRD/17.

Magnet Cleaning record- FSR/PRD/36.

Daily Glass Items check record- FSR/PRD/37.

Glass Breakage checks record- FSR/PRD/38.

Lux intensity checks record- FSR/PRD/50.

Machine Hygiene checks & clearance record- FSR/PRD/15.

Regular Plant sanitation audits are performed by HACCP team & checked as recorded.

Limits of acceptable levels of cleaning are defined. Product is under low category risk type.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

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Documented risk management system is evident. Last risk assessment was done as in HACCP studies & Allergen risk assessment- PS/15 dated 01.01.2025 (Last was reviewed on date 01.01.2025- No changes).

VACCP– PS/13 dated 01.01.2025 is also documented. Last was reviewed on date 01.01.2025. Vulnerability risk assessment is evident in PS/13 rev. 00, dtd. 01.01.2025 for raw material. Risk is identified as threat A as unacceptable risk – new control required, B as moderate risk – further risk reduction investigation needed, C as insignificant risk – new control Optional. The same is resulted as C. Conclusion as no additional controls required, periodical review as annually need to be performed or as and when required.

It was observed that Organization Top management is into this business from long time. These are typical agriculture-based product controlled by Regulatory Bodies. No such substitution or adulteration/fraud issue was observed by the Senior management in this organization in recent years. On the basis of risk from raw material assessment- Low risk were identified. Risk covered were- Allergen contamination, Foreign body, Microbiological contamination, Chemical contamination, Aflatoxin, Vulnerability & Fraud. Marking is given from 01 to 10 as per experience of Sr. Management & risk associated with the Raw material. In-house checks are always performed before unloading of the raw material especially for foreign matters & Moisture% for every lot.

Documented supplier assessment, selection, approved criteria is also documented in SOP for purchase- SP/09 rev. 00 dated 01.01.2025. Supplier selection based on Past experience, Evaluation & review of questionnaire, sample approval, market reputation etc.

Approved supplier list ref. FSR/PUR/01, REV.00, DTD. 01.01.2025. Purchase is made through direct manufacturers and traders, auction wise. Packaging material suppliers are approved by the company on the basis of Past experience, market reputations and on-site audits.

Vendor assessment is done. Suppliers are existing form initial of the business.

Suppliers audit & assessment FSR-PUR-04 & 02 and performance evaluation – register – FSR-PUR-03:

For R/M & P/M suppliers:

- Local Agriculture market – Bulk commodities – for all Psyllium Seeds, - assessment dtd. 12.03.2025, evaluation grade – A.

In-house Lab checks: FSR/PRD/02

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•Packaging material (PP Bags)- M/s Moondra packaging. Checked for Dated:- 27.04.2025, Total quantity:- 1000 Qty, Invoice number:- 10597.

•Packaging Material (PP Bags)- From M/s Aadinath Polymers. Checked for Date:- 02.05.2025, Total quantity received:- 317 kgs Qty, Invoice number:-AP/2025-26/089.

Checked for PM External inspection

•PP Bags: Migration form External TMC laboratory Report Number:- TMC/25/04/161, dtd. 14.04.2025.

Paper Bags: Migration form External TMC laboratory Report Number:- TMC/25/04/162, dtd. 14.04.2025.

Exceptions to the supplier approval processes are documented in the procedure for selection & approval approach.

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

SOP Procedure for inspection and testing- SP/20 issue 00 date 01.01.2025 is evident. Only Quality inspections, purity & moisture checks are performed by in-house QC team. There is no chemical or microbiological Lab as in-house laboratory. These testing are performed with the external lab only.

Raw material & packaging material acceptance & monitoring plan is documented & established. Raw material is also get checked from external laboratories. Packaging material is accepted on the basis of test reports/COA from Vendors:

Checked for RM incoming check record no. FSR/PRD/01:

RM qnty = 36450 kg, Raw material batch number:- PS/D29/25.

•Wastage & Other By-Products = 25950 kg process waste and loss

•Final qnty. = 10500 kg

•Dispatch qnty = 10500 kg

•Stock = NIL.

Checked for PM- packing Material Inspection record FSR/PRD/02:

PM supplied from – M/s. Moondra Packaging – for pp Bags, Invoice number 10597, qnty = 1000 Bags ,dtd. 27.04.2025 – running stock maintained.

### 3.5.3 Management of suppliers of services

Procedure for Approval & monitoring of suppliers of services is documented in the SOP for Purchase in BRC manual.

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- Suppliers of Services included the following: Pest Control, Calibration, waste management, laundry services, testing lab services, food safety consultant and container fumigation.
- The service providers are evaluated by Material Identification and Supplier Control Committee A number were reviewed through contracts. The procedure for control of service provider SP/11. Service provider risk assessment is done in Document FSR/PUR/04.
- Service suppliers are approved based on the ability to provide services as per defined contract or agreements. The performance of service suppliers is evaluated when contract is awarded and upon completion of job.
- Waste control: agreement with M/s. Shree Durga enterprise - dtd. 01.01.2025 to 31.12.2025.
- Laundry- Laundry contract with M/s- Krishna Laundry, contract dated 01.01.2025 till 31.12.2025 for washing aprons. Laundry was audited by QC In charge on 06.04.2025 as per record no. FSR/MNG/13. Monitoring record- FSR/PRD/38 of the effective cleaning of the protective clothing at the time of receiving from laundry
- Pest control:- M/s Elite Service, Contract dated 01.01.2025 & validity for 01 year. Services are defined in the pest control records.

### 3.5.4 Management of Outsourced processing

NA. There is no outsourced process

### 3.6 Specifications

The facility is having documented specification for the finished products, raw material and packaging material.

Finished product specification in product data sheet / product description: the data specifications are maintained and the copies are shown during the audit. All products as raw material and packing material is being handled.

- Checked for the same for the product and packing material during the HACCP and traceability study.

It covers the requirement as organoleptic / Gn. Characteristics, chemical and microbial etc. - as per the product requirement and buyer requirement.

Annual review and update done on the same – specification Product Data Sheet / product description: review in HACCP as on dtd. 09.01.2023

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•Product Description evident Ref. PS/03 dated 01.01.2025. Verified for Psyllium seed, psyllium husk and psyllium powder.

F/G specification PS-03: [For All products -etc.]

- Shelf life = 36 years for all products.
- Pack = primary pack = Paper bag and PP bag - as required.
- Intended use = use for food ingredient – as food for human consumption.

RM specification: PS/03-RM [all Raw material] – covering the Gn. Characteristics.

Specification for P/M – as PS-03- Paper bag and PP bag – as per the customer requirement.

As per company procedure, the specifications will be reviewed once in a year unless any changes to be done. The specifications are agreed with the suppliers & customers. Last review was done on 01.01.2025. All specifications are reviewed once in six months or whenever there is any change in specification of regulatory or legal requirements.

### 3.7 Corrective and preventive actions

System is available in the operation to identify the non-conformances, investigate the cause of any non-conformances against specifications, standards, procedures and requirements and correction & corrective action to be taken with the time scale. Ref SOP of Corrective Action SP/05 & 06 rev 00 dated 01.01.2025. Corrective actions were recorded in CAR reports & customer compliant details & maintained. The corrective action plan & responsibility is documented for internal & external audit, product NC, customer complaint, regulatory incompliance etc. Verified the corrective action record for last internal audit NCs & found appropriate. No deviation in CCP & no Non-conforming product in last six months.

### 3.8 Control of non-conforming product

Control of non-conforming as per SP/04 rev.00 dated 01.01.2025. The corrective action plan & responsibility is documented for internal & external audit, product NC, customer complaint, regulatory incompliance etc. Non-conformity product are identify as verified during site round.

Raw material & packing materials are sampled & to be checked before intake. Sample if failed then it is rejected & not purchased as per QC manager.

Checked for daily Non-conforming product/rejection record.

No deviation in CCP & no Non-conforming product in last six months.

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3.9 Traceability

The company has a system of identification and trace the products with Batch Number / Item code / Lot number. It is verified. Ref. Documented procedure for Traceability- SP/13 issue date 01.01.2025. In-house traceability check is performed by the company on yearly basis.

Last backward traceability/mock recall was performed along with mock recall exercise on date 18.09.2023 for product- Psyllium Husk batch no. PH/E06/25, packed in 25 Kgs x 406 PP Bags, total quality- 10150Kgs, dispatched on date 13.05.2025 in vehicle no. GJ12BX1589, Invoice number:- RIL/2025-26/04 to customer in India.

Total time taken in traceability check was 02.20 Hours. Mass balance is done & recorded in the traceability summary sheet.

Mass balance checked and verified.

Production, packing, CCP records maintained and test report checked.

Traceability meeting the requirement. Production, quality, CCP, labelling, storage & dispatch product release data maintained.

//////////

Traceability Challenge by Auditor:- - within 4 hrs.

It was done for Product: Psyllium Husk - lot / batch: PP/E18/25. Packing size: 25 Kg Bags, total dispatched qty. = 10500 kg

Tractability summary – verified

Production & packing: 18.05.2025.

Dispatch : 22.05.2025.

Consignee in Gujarat, India– Domestic.

Container/ vehicle : RJ19GK0730, INV. – RIL/2025-26/05

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PM supplied from – M/s. Moondra Packaging – for pp Bags, Invoice number 10597, qty = 1000 Bags ,dtd. 27.04.2025 – running stock maintained.

Mass balance checked

RM received of raw Psyllium seeds from- 1. 17370 kgs from Shourabh Traders – dtd. 29.04.2025

2. 19080 kgs from Mittal Enterprises – dtd. 29.04.2025

RM qty = 36450 kg, Raw material batch number:- PS/D29/25.

- Wastage & Other By-Products = 25950 kg process waste and loss

- Final qty. = 10500 kg

- Dispatch qty = 10500 kg

- Stock = NIL.

Production, packing, quality, CCP, labelling, storage & dispatch product release related data maintained.

Mass balance conducted as above.

Traceability meeting the requirement as forward and backward vis-a versa.

Traceability checks were complete & successful.

There is no such re-working system here.

However, Minor NCR – 3 is raised in this audit as [3.9.2]: Identification of the semifinished goods found missing at few areas.

### 3.10 Complaint-handling

The procedure is there for the complaint handling having document number SP/17 dated 01.01.2025. It covers Investigation history, Possible root cause, Corrective & preventive actions records.

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There is no customer complaint received related to food safety and quality in year 2025 and as checked with records & interview of senior management.

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

The organization has documented procedures for Emergency Preparedness Response- SOP no. SP/10 rev 00 dated 01.01.2025. Procedure includes emergency situations like Fire, Explosions, and Major spillage, occupational Emergencies / Accidents fire, flood or natural disaster, malicious contamination or sabotage. Disruption to key services such as water, energy, transport, staff availability and communications. Mock drills are done for product recall as per annual frequency.

SOP for Product recall/withdrawal- SP/13 rev 00 dated 01.01.2025.

Recall team is identified and 03 people are members of the team. The Partner is Team leader and recall coordinator.

Contact details of recall team are available in the mock recall report and are displayed in various locations in the factory.

List of agencies and certification body to be informed in case of product re-call is evident. List of agencies and certification body to be informed in case of product re-call is maintained. Information of the Legal & regulatory boards are mentioned in the SOP. So far no real product recall has taken place in year 2025.

Emergency recall team member contact numbers are mentioned in procedure.

Last backward traceability/mock recall was performed along with mock recall exercise on date 18.09.2023 for product- Psyllium Husk batch no. PH/E06/25, packed in 25 Kgs x 406 PP Bags, total quality- 10150Kgs, dispatched on date 13.05.2025 in vehicle no. GJ12BX1589, Invoice number:- RIL/2025-26/04 to customer in India.

Total time taken in traceability check was 02.20 Hours. Mass balance is done & recorded in the traceability summary sheet.

Mass balance checked and verified.

Production, packing, CCP records maintained and test report checked.

Traceability meeting the requirement. Production, quality, CCP, labelling, storage & dispatch product release data maintained.

Records found maintained. Ref. Record no. FSR-PRD-44. Total time taken for mock drill was 03.30 Hours. All the events were recorded including customer communication & mails there in file for mock recall. Organisation has made the provision in the procedure but so far no real product recall has taken place

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There is no incident of Actual product recall in year 2025 till date as per checking of records & interview of staff.

| Details of non-applicable clauses with justification |   |
|--|---|
| Clause/Section Ref                                   | Justification   |
| 3.5.4  | There is no outsourced process.   |
| 3.9.4  | There is no re-working system. Reworking is not allowed as per the company norms. |

#### 4. Site standards

##### 4.1 External standards

Unit is located within a premise where product is made. External areas including planted area are well maintained and a gap between the boundary and planted area is maintained. The building fabric is maintained to minimise potential for product contamination as per the industry norm.

Monthly cleaning is performed as per the company management.

Vegetation crop observed in the plant during the audit and was maintained well away from the production building.

Pest control arrangements are observed in all the external areas especially for rodents.

Procedure for security is available:- SP/19 dated 01.01.2025 divided broadly in external security & internal security etc. Boundary walls are provided and guarded by security personnel round the clock. No unauthorised access is allowed. Security is strictly maintained.

Visitors reporting program is in place. External personnel are to be accompanied by the company's staff while entering in the production facilities. Visitor entry register is evident and found practiced during the audit.

Boundary wall is found secured and guarded by security person round the clock. Visitors pass are issued at the main gate

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Total of 2 security members are available as per the shift – as required. Interviewed security person about roles and requirement.

Inward control is made on man movement and material movement & registers are maintained for same.

Emergency contact numbers are available at security gate. Quick Response Team is formed for emergency situations.

The documented security assessment checklist is verified as PS/12 dated 11.05.2025 The external & internal area is covered. Also manpower, visitors are covered during the assessment. Interviewed security guard & found aware about security protocol & visitor control.

Minimum 08 CCTV cameras are in place in all corners of the site.

**4.2 Site security and food defence**

Procedure for security is available-: SP/19 dated 01.01.2025 divided broadly in external security & internal security etc. Boundary walls are provided and guarded by security personnel round the clock. No unauthorised access is allowed. Security is strictly maintained.

Visitors reporting program is in place. External personnel are to be accompanied by the company’s staff while entering in the production facilities. Visitor entry register is evident and found practiced during the audit.

Boundary wall is found secured and guarded by security person round the clock. Visitors pass are issued at the main gate

Total of 2 security members are available as per the shift – as required. Interviewed security person about roles and requirement.

Inward control is made on man movement and material movement & registers are maintained for same.

Emergency contact numbers are available at security gate. Quick Response Team is formed for emergency situations.

The documented security assessment checklist is verified as PS/12 dated 11.05.2025 The external & internal area is covered. Also manpower, visitors are covered during the assessment. Interviewed security guard & found aware about security protocol & visitor control.

Minimum 08 CCTV cameras are in place in all corners of the site.

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TACCP:

The TACCP – PS/14, Rev. 00, dtd. 01.01.2025 as the risk assessment is done. It is based on likelihood of occurrence and likelihood of detection. Likelihood of occurrence is divided from 1-5 as unlikely to happen, may happen, some chance, high chance, very high chance, and for the Impact of the same is 1 -5 as minor, some, significant, major and catastrophic.

**4.3 Layout, product flow and segregation**

Plant lay out evident in the Site Master File under the control of the management and displayed at the plant entry, evident during the audit. The product and industry is the low risk categorisation.

The access points, product & manpower flow is defined. As man and material movement, rodent boxes, EFK, emergency gates - is sufficiently as per risk analysis.

All area in the enclosed product - Adequate segregation is evident by use of doors, strip curtain is evident.

There is no high risk and high care area as per the industry.

Processing hall is appropriate. Sufficient working space and storage capacity is provided.

Internal roadways related work is under the arrangements - and evident during the audit. There is no cross contamination found observed for the same to the routine activity

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

Walls are constructed of RCC concrete and puffed panels & found maintained – as per the industry norms. The walls are appropriately maintained to prevent accumulation of dust, dirt and mould growth. This also facilitates easy cleaning.

The floors are impervious and are suitable for the intended use and withstand daily activities of cleaning and demands of the process. Floor is made up of RCC, Tiles & Kota Stones.

No internal drainage in the processing area. External drainage is designed to minimise contamination. External drainage is covered and maintained well. Only change room has the drain and outside production building - inside plant there is no drainage.

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There is no high risk & high care area identified in the processing unit on the basis of risk analysis.

Ceilings and overheads are maintained without causing any contamination. No False ceiling & roof voids provided in the processing facility.

Windows as ventilation are of covered adequately. These are screened as well.

The strip lights are protected with hard plastic shatter proof covers and numbered, observed during the audit. Light intensity / LUX check is checked with external lab TMC Lab, report # TMC/25/04/163, DTD. 14.04.2025– covering of five different locations of the plant as processing section, PM storage, RM storage, packing area and FG storage.

Ventilation was satisfactory in the product storage area & processing environments. Adequate ventilation is there in the processing area for exhaust as per the industry need.

However, Minor NCR – 4 is raised in this audit as [4.4.8]: Door gap observed at the dispatch section.

4.5 Utilities – water, ice, air and other gases

Water source is bore well. Water is not used in processing; Water is only used in change room for hand washing. Water testing was done through external lab for IS10500:2012 compliances.

Verified as Water Test: Water Test report no. # TMC/25/04/165, DTD. 14.04.2025 from External Lab M/s TMC laboratory is evident. It was done against IS 10500:2012 requirements.

Water tank cleaning record is evident. Last was done on 03.06.2025 previous done dated 05.05.2025 as per frequency record no FSR/PRD/19. Water distribution Plan is updated for water distribution, including holding tanks, water treatment.

Water is not used in processing.

Other gases, steam are not used for product contacts or as ingredient.

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Compressed air is used for cleaning purpose only & filters were provided in compressors.

Compressed air is tested from external laboratory # TMC/25/04/166, DTD. 14.04.2025.

#### 4.6 Equipment

All equipment's are newly purchased & installed as per industry requirements & guidelines in year 2024-25. FSSAI & spice board approval certificates are available for site.

Food contact utensils are made of industrial specific grades like Food grade materials like SS-304. The certificate of conformity is evident for the belt and SS vessels.

The equipment is positioned to give easy accesses for cleaning, inspection and servicing. All equipment design is as per standard industry practice. Equipment is suitable and designed for the purpose.

No new equipment installed recently. Risk based commissioning procedures are developed & documented.

Static equipment's were cleaned & integrity maintained properly as checked during on-site audit.

No such mobile or battery operated equipment's used in open product areas.

SOP for preventive maintenance is documented as- SP/14 dated 01.01.2025.

List of Machinery & equipment is evident- FSR/PRD/13. Machineries and equipment such as MTRA, Destoner, Gravity separator, Sortex, Grinder, Grader, Milling, Blending, metal separator are daily inspected to avoid any foreign body contamination and record maintained. Hygiene clearance inspection done by online QA after maintenance work.

HACCP checks are also performed on monthly basis. Hygiene clearance was recorded & found maintained.

#### 4.7 Maintenance

SOP for preventive maintenance is documented as- SP/14 dated 01.01.2025.

List of Machinery & equipment is evident- FSR/PRD/13. Total number is 38 of Machines. Machineries and equipment are daily inspected to avoid any foreign body contamination and record maintained. Hygiene clearance inspection done by online QA after maintenance work.

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HACCP checks are also performed on monthly basis. Hygiene clearance was recorded & found maintained.

List of Machinery Doc. FSR/PRD/13 Preventive Maintenance records checked as:

- Metal detector: dtd. 03.06.2025, 16.05.2025, 02.05.2025.
- SORTEX machine: dtd. 03.06.2025, 16.05.2025, 02.05.2025.
- Gravity separator: dtd. 03.06.2025, 16.05.2025, 02.05.2025.
- De-stoner: dtd. 03.06.2025, 16.05.2025, 02.05.2025.
- MTRA: dtd. 03.06.2025, 16.05.2025, 02.05.2025.
- Grinder/ De husking: 03.06.2025, 16.05.2025, 02.05.2025.
- Huller/ Winnowing machine: 03.06.2025, 16.05.2025, 02.05.2025.

Breakdown maintenance- FSR/PRD/15-A: No breakdown is reported.

Food grade compliance for the bearing grease evident # LGFP 2, NSF grade H1, dtd. 10.04.2025.

Work shop does not open directly in the production area as the same is at the back side of the plant.

However, Minor NCR – 5 is raised in this audit as [4.7.3] : Temporary cello taping used on piping section.

#### 4.8 Staff facilities

Adequate changing facilities are provided in change rooms before entry to the production areas. There is a double door system before entry to the plant & change room is made before entry to processing hall.

Suitable sized lockers are provided to keep the personal items. Lockers for accommodation of personal items were provided at change room.

There is a separate arrangement for the used and cleaned protective clothing at workers change room.

Hand-wash facilities are provided with elbow operated hand taps, liquid soap, Dryers and advisory signs to prompt hand-washing.

Separate toilet facilities are provided dedicated for the use by the male & female workers & both these toilets were provided with the proper hand wash facilities.

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Factory is declared as no smoking zone. Smoking & tobacco use is not allowed inside the site premises.

Food dining area is provided which is away from packing facility. Tiffin to be kept at separate identified place in dining area near entrance gate.

Eating and drinking is not allowed in processing area or any other area.

Catering facility is not provided by the organisation

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

**4.9.1 Chemical control**

A chemical control procedure is in place which manages the use, storage and handling of non-food chemicals- SP-27 Rev.00 dtd. 01.01.2025.

Liquid hand wash, and sanitizer practiced and is being controlled well.

Chemicals were labelled.

Laboratory practiced and the required chemicals kept under the authority.

Strongly scented & taint-forming materials are not allowed

**4.9.2 Metal control**

Metal control policy- PS-01-MEP Rev.00 dated 01.01.2025 is documented. Metal control program is a part of Foreign Object control program. Daily monitoring in place. No use of the snap-off blades evident in the plant.

Staple pins, paper clips and drawing pins are not used or allowed in the packaging or ingredients packaging in the processing areas. Metal detector used.

Knife use register FSR/PRD/33 for Knife is practiced the broken was collected and replaced.- check for the month of May – June 2025 – based on production. – no deviation reported.

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Needle use register FSR/PRD/34-B for needle is practiced the broken was collected and replaced.- check for the month of May – June 2025 – based on production. – no deviation reported.

Metal detector used. Magnets used.

Metal detector is in use & controlled through CCP Plan.

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

There is glass/brittle plastic control policy as- PS/01GP rev.00 dated 01.01.2025. Glass items are protected against breakage with shatterproof covers.

Glass register available and inspection of all glass. Ref. Glass & Brittle plastic control is a part of Foreign Object control program- SP-29.

Documented procedure for handling glass, brittle and hard plastic is in place.

Checked Glass control for monitoring of glass/clear brittle plastic in production and storage area, monitored on daily days basis. Glass material is not used for packaging.

Glass condition monitoring checklist maintained and recorded as- FSR/PRD/34.

Glass & Brittle Plastic breakage record is checked- FSR/PRD/35.

No breakage recently.

Glass & PVC window are placed in most of the production and store areas. These are found protected against breakage and numbered in the plant.

The strip lights & other lights are protected with hard plastic shatter proof covers. Tube lights are found protected in the plant.

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

NA. Product not packed under Glass or Brittle plastic packaging.

**4.9.5 Wood**

Wood policy is documented as- PS/01W dated 01.01.2025. No use of wood is allowed in the processing area as per wood policy except it is permitted by FSTL. No such wood cross contamination issue to the product is observed in the plant.

**4.9.6 Other physical contaminants**

Metal, Glass, Wood & Brittle plastic control is a part of Foreign Object control program. The sorting, sifting & Metal detection is done to ensure removal of foreign body from product. Sieves and Magnets are also in use in the processing.

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Procedures & policies are established for removing physical contaminants at the time of receiving, during process & packing.

Pens are used in process by supervisors only & are metal based so detectable by metal detector in the line. Pen control register is found maintained.

4.10 Foreign-body detection and removal equipment

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

Company does use the SS made sieves, metal detector and magnets for foreign body detection. Magnets are used at different stages for metal detection. Periodic checking records are maintained. No deviation is observed. This is a part of HACCP study as risk assessment. Justification given for any damages, processing equipment made of stainless steel. There is continuous visual check for processing and monitoring any possibility of cross contamination. HACCP Plan is established for control, monitoring of metal detectors- PS/08 dated 01.01.2025 are established. No such deviation was observed as checked during site visit.

4.10.2 Filters and sieves

SOP for Sieve checking are established as OPRP Plan PS/07 dated 01.01.2025. Company does use the SS made sieves & filters. Records of operations are maintained. Powder products are pass through Vibro-sifter, Grader, MTRA, Gravity separators with sieve sizes ranges between 20, 40, 60, 80, 100 mesh Results was OK as verified for month of May – June 2025 as on date. Sieves conditions are regularly monitored. Records are verified in sieve monitoring checklist on daily basis.

- Sieve Calibration - PTCC/2504/012 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.

4.10.3 Metal detectors and X-ray equipment

CCP -1: Metal detector / separator [P] for all products: CL = Fe: 2.5 mm, N-Fe = 3.0 mm, SS = 4.0 mm, Monitoring frequency is to check the same before, during and after every lot – by operator. Corrective action as – check the proper calibration and reject the material if found deviated.

- Rec. FSR-PRD-08 for product Psyllium Husk Powder, dtd. 18.05.2025, batch # PP/E18/25 mentioned in the record – verified the same in the system as for Psyllium Husk powder.

- No CCP related deviation reported as on.

Validation:

The HACCP food safety team has conducted validation for the CCP- Validation reports- PS/09.

- Validation and Calibration test done by manufacturer for Metal Detectors & metal probes pieces evident as provided by PTCC/2504/016 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.

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|---|
| 4.10.4 Magnets  |
| <p>Magnets are used in the production facility. The magnet strength is checked &amp; recorded as Peak gauss.</p> <p>Documented procedure is in place and records are maintained for cleaning, strength, integrity checks.</p> <p>Magnet: magnet cleaning on before and after process, gauss 10000 as control measure – by line supervisor checked.</p> <p>•Magnet on-line. Certificate no. PTCC/2504/015 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre &amp; valid till 05.04.2026.</p>  |
| 4.10.5 Optical sorting equipment  |
| NA- No optical sorting equipment  |
| 4.10.6 Container cleanliness – glass jars, cans and other rigid containers  |
| NA. Product is not packed in Jars, cans and other rigid containers.   |
| 4.10.7 Other foreign-body detection and removal equipment   |
| <p>NA as other foreign body detection or removal equipment is not used in the process.</p> <p>NA as other foreign body detection or removal equipment is not used in the process.</p>   |
| 4.11 Housekeeping and hygiene   |
| <p>Hygiene and Housekeeping program is documented and implemented. Records for cleaning are checked. Floor cleaning (enclosed product area) is defined with the use of water, mop, broom, and dustbin. Ref. procedure- Plant Premises, Equipment &amp; Machinery hygiene- SP/24 dated 01.01.2025 is available. Weekly hygiene audit is performed for production areas by QA/QC dept. &amp; detailed checklist is evident. Hygiene Audits/Inspections to be carried out on daily/monthly basis in respective areas. Verified the GMP checklists and records to be perform on monthly basis: Monthly GMP audit was performed on date 26.07.2024, 28.06.2024, 30.05.2024 as per record no. FSR/MNG/09.</p> <p>Cleaning performance is checked before starting production in each shift by supervisor and verified by QC in charge. FSTL &amp; QC persons are authorised to verify the cleaning status &amp; checks on daily basis.</p> <p>Daily Plant Cleaning Record- FSR/PRD/18.</p> <p>Daily Machine cleaning- FSR/PRD/17.</p> <p>Magnet Cleaning record- FSR/PRD/36.</p> <p>Daily Glass Items check record- FSR/PRD/37.</p> <p>Glass Breakage checks record- FSR/PRD/38.</p> |

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Lux intensity checks record- FSR/PRD/50.

Machine Hygiene checks & clearance record- FSR/PRD/15.

Regular Plant sanitation audits are performed by HACCP team & checked as recorded.

Limits of acceptable levels of cleaning are defined. Product is under low category risk type. There is a separate team for cleaning for production & non production areas. Dedicated cleaning machines and tools are provided for packaging area. The cleaning procedure found in place for areas according to risk identified.

Records for month from May – June 2025 as on date are verified.

The cleaning procedure found in place for areas according to risk identified. The cleaning schedule is available. The training record of the cleaning staff evident. The usage of cleaning chemicals found as per documented program. Records for month of May – June 2025 as on date are verified.

Checking of cleaning performance is responsibility of area supervisor. Result of verification and acceptance are recorded. Line released record checklist is verified. Record was verified by QA & filled by Line quality control.

•Sanitation, House Keeping & Personal Hygiene training was given on date 13.01.2025 to Workers & Staff member by External Consultant. The facility found in clean and hygienic order on the day of audit.

**4.11.7 Cleaning in place (CIP)**

NA. CIP system is not required in this facility.

**4.11.8 Environmental monitoring**

The cleaning procedure found in place for areas according to risk identified. The cleaning schedule is available. The training record of the cleaning staff evident. Environment monitoring is done through swab tests & air monitoring from external Lab- Frequency is once in a year last done 01.01.2025.

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Risk is low as per assessment. Frequency of air sampling & swab testing is yearly once. Criteria rating are 1 to 3. Parameters were meeting clause 4.11.8.1. Parameters to be checked are TPC, Y&M, Coliform, E. coli, Salmonella. No previous history of pathogen presence in air & resulted in product contamination.

Documented cleaning procedure is maintained in the Food Safety Procedure manual with frequency of cleaning, items to be cleaned, method of cleaning, cleaning chemicals and checking. Daily Cleaning records are maintained and checked.

Swab & air monitoring verification for cleaning effectiveness is done as: Last was done from In-house microbiology Lab- fortnightly.

- Apron swab - report # TMC/25/04/154, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard..

- Hand swab - report # TMC/25/04/153, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard.

- Air monitoring, for RM Storage, Pre-cleaning, grinding section, Husk section, Powder section, FG storage area, - report # # TMC/25/04/155 to /160, dated: 14.04.2025,– TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard.

Checking of cleaning performance is responsibility of area supervisor. Result of verification and acceptance are recorded. Record was verified by QA & filled by Line quality control. Colour coded Equipment are used and labelled. Equipments are suitable for this type of operations. These are kept separate in store adjacent to production areas.

Reports checked by FSTL.

#### 4.12 Waste and waste disposal

SOP for Waste control & disposal is established. Systems and Procedures are available for rejection, obsolete packaging material, rejected packaging materials are classified.

Waste control / removal procedure - SP/23, rev. 00, dated 01.01.2025 is established.

Waste control: agreement with M/s. Shree Durga enterprise - dtd. 01.01.2025 to 31.12.2025.

Waste disposal practiced register maintained.

Identified waste bins are used for handling rejection waste materials Waste is stored in separate area. Waste containers and area is maintained clean.

Waste disposal practiced –dtd. 16.05.2024, for 2810 kg wastage.

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However, Minor NCR – 6 is raised in this audit as [4.12.2]: It was found that bags for rejection/wastage are not found of different colour or type from product packaging bags.

4.13 Management of surplus food and products for animal feed

NA. Organization does not sell its products as Surplus food or animal feed.

4.14 Pest management

SOP for Pest control is established as- SP/26 date 01.01.2025. Services are defined. Disinfestation services & Rodent control services are contracted. Pest control system is effective in controlling of pest infestation. Building height is maintained with almost 03 feet above from ground. Preventive pest control measures found in place like use of self-closing doors, screening on windows, air curtains etc. Integrated Pest management is evident.

- Pest control:- M/s Elite Service, Contract dated 01.01.2025 & validity for 01 year. Services are defined in the pest control records.
- Service provided as the Cockroach management- weekly, Rodent/Lizard management-Weekly, & Mosquito / Fly management-Weekly. Check visit records dtd. 05.06.2025, 26.05.2025, 18.05.2025- no deviation reported.

Pest control agency license # PCO L-648, valid till:- 17.08.2025

Pest control controller person training certificate provided for 1 staff implementer / any staff person can visit the activity – and their training on dtd. 29.04.2025 - Ref. for Mr. Mukesh Kumar Yadav.

Survey / Audit report conducted - / once in a year minimum/ based on risk assessment - by service provider dtd:- 03.04.2025 - the different areas of the plant is being conducted as RM unloading area, RM storage, change room area, Dispatch and cleaning section. Agency has provided the observations and suggestion as access issues and the preventive action to the organisation. Advisory and general recommendations area also addressed in the report - no deviation / infestation reported.

In-house check performed: The bait station map is there & matching with actual. Total Roda boxes = 12 & EFK = 6.

- Rodent control checklist PRD/21 – check for the May – June 2025 as on dtd. – no deviation reported.
- EFK control checklist PRD/23 – check for the May – June 2025 as on dtd. – no deviation reported.
- Trend analyses PRD/22 maintained from Jan – June 2025 and address all locations and are being maintained by the organisation. No deviation reported as – if so then the same is being discarded as per the norms.

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Company employee found aware about the requirement of the pest control activities on-site, interviewed Mr. Rama ram –and is found satisfactory on pest control management.

Pest infestation and catchment data maintained by the organization

**4.15 Storage facilities**

Procedures for receipt, unloading, storage and handling of incoming material, for transportation of within and outside factory premises are followed for storage of raw material, finished goods, packaging and consumable. Ref. Procedure- SP/21 rev.00 dated 01.01.2025. Work instructions for FIFO- SP/21, Receipt of RM/PM, Procedure for dispatch- SP/23 are documented.

Temperature control is not required for whole processing of product.

Proper capacity is there for storage.

No controlled storage required for the product or raw material.

However, Minor NCR – 7 is raised in this audit as [4.15.1]: Some of packing material found kept on the floor.

No outside storage is practiced.

Finished goods storages are available for packed product storage. The stock use as per shelf life is followed. The FIFO is monitored through stock monitoring & identification for first use inside the storage area. All the products require ambient storage.

Records checked in traceability exercise on-site.

**4.16 Dispatch and transport**

Procedure for despatch and transport is maintained in BRC manual. SOP for Despatch is documented as SP/22 issue 00 dated 01.01.2025. Dispatch cum Stuffing sheet register is maintained- PRD-09. All vehicles and containers used for the dispatch of products are inspected and recorded in loading check list & Container check list- PRD-09. Vehicle cleaning check work instruction is established.

Vehicle loading checklist is evident. Verified for May – June 2025 as on date.

•Transport: agreement with Athena Logistics, from 01.01.2025 to 31-12-2023.

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Ambient Temperature control is required during transit. Maintenance and cleaning procedures are available for RM/FG material transporting vehicles. Records maintained vehicles and unloading and loading equipment also.

Records verified for product dispatched as:

Psyllium Husk batch no. PH/E06/25, packed in 25 Kgs x 406 PP Bags, total quality- 10150Kgs, dispatched on date 13.05.2025 in vehicle no. GJ12BX1589, Invoice number:- RIL/2025-26/04 to customer in India.

Psyllium Husk - lot / batch: PP/E18/25. Packing size: 25 Kg Bags, total dispatched qnty. = 10500 kg

Tractability summary – verified ; Production & packing: 18.05.2025. Dispatch : 22.05.2025. Consignee in Gujarat, India– Domestic. Container/ vehicle : RJ19GK0730, INV. – RIL/2025-26/05

| Details of non-applicable clauses with justification |   |
|--|---|
| Clause/Section Ref                                   | Justification   |
| 4.3.6  | No Temporary structures observed in the premises during the course of Audit.  |
| 4.6.6 & 4.6.7  | No such mobile or battery operated equipments used in open product areas  |
| 4.8.6  | Factory is declared as no smoking zone.   |
| 4.8.8  | Catering facility is not provided by the facility.  |
| 4.9.1.2  | Strongly scented & taint-forming materials are not allowed in the production areas.   |
| 4.9.2.2  | Staple pins, paper clips and drawing pins are not used or allowed in the packaging or ingredients packaging in the processing areas |
| 4.10.7.1   | NA as other foreign body equipments is not in use.  |
| 4.11.7   | CIP system is not provided in the production facility as per processing system & requirements.                                      |
| 4.12.4   | No such third party contract system by the site.  |
| 4.13   | Management of surplus food and products for animal feed   |

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|        |  |
|--------|--|
| 4.14.3 | Pest control services are outsourced from external agency. |
| 4.15.4 | Controlled atmosphere is not required.                     |
| 4.15.5 | No outside storage is there in the site.                   |
| 4.16.3 | Temperature control is not required in transit.            |

|   |
|---|
| <b>5. Product control</b>   |
| <b>5.1 Product design/development</b>   |
| <p>Product is supplied as per customer requirements. There is no such design &amp; development activities are required in this type of product. No new product is developed in the recent past. SOP for Design &amp; development is documented as PS/15 issue 00 dated 01.01.2025. HACCP based studies, Shelf life studies is available as a part of D &amp; D. The products are well established. Potential risks and hazards are adequately addressed. There is no Glass packaging, allergen in the product. HACCP-based study is done as a part of the product design and development process. HACCP team leader is responsible to control of changes in HACCP system. Safety of the product is established by testing the products. Specific testing is performed in experts &amp; experienced persons. Hazard analysis is conducted for all the process steps and products to ensure manufacturing of safe products.</p> <p>Shelf life trials are conducted and records are maintained. Shelf life is established based on tests, industry norms and codes of practices for food safety.</p> <p>Shelf life claimed is 24 months.</p> |
| <b>5.2 Product labelling</b>  |
| <p>SOP for Labelling &amp; Packing control is established as Packing &amp; dispatch of Finished Goods. Labelling information is provided by customers for private labelling. Products are sent in packing as per customer given details.</p> <p>Company has legal cell for taking care of labelling approvals &amp; Labelling of the products is as per the legislative requirement and as per the customer guidelines. Labelling is followed as per local regulatory requirements and or customer requirements. Packaging material is checked by QC for labelling approval.</p> <p>Labelling approval procedure SP/30 Rev. 00, dtd. 01.01.2025.</p> <p>No such claim is made to satisfy a consumer group.</p>  |

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There is no allergen in the finished products as verified from ingredient list in labelling.

Packaging material is checked by QC for labelling approval.

No such product claims are made to satisfy a consumer group by the organization.

Label/Printed bag control plan & checklist is evident as- FSR/PRD/07 as record. It covers Bag verification, Label verification & Printed information checks.

General checklist for Export/Domestic packing is maintained which includes Party name, Brand name, packing size, type of packing, stitching check, pouch sealing, drop test, gross weight, net weight, batch number, packing date, best before.

Label checks by QC & production is done on-line & off line as per record. Checked for products:

- Psyllium Husk batch no. PH/E06/25, packed in 25 Kgs x 406 PP Bags, total quality- 10150Kgs, dispatched on date 13.05.2025 in vehicle no. GJ12BX1589, Invoice number:- RIL/2025-26/04 to customer in India.

- Psyllium Husk - lot / batch: PP/E18/25. Packing size: 25 Kg Bags, total dispatched qty. = 10500 kg. Dispatch : 22.05.2025. Consignee in Gujarat, India– Domestic. Container/ vehicle : RJ19GK0730, INV. – RIL/2025-26/05

No CCP related deviation reported as on. Also, checked on-site for product Psyllium husk 85% Batch no. 23/016 during site visit.

### 5.3 Management of allergens

Site does not handle any allergen. Allergen policy dated 01.01.2025. Raw material or Product does not contain any allergen given in the list of BRC glossary.

Allergen risk assessment is conducted & recorded by the organization. Final Products including raw material is assessed and found free from allergen- Ref. PS/16 dated 01.01.2025.

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

The organization has done vulnerability risk assessment in VACCP sheet- PS/13 dated 01.01.2025.

By competent food safety team. Vulnerability risk assessment is done based on likely hood of occurrence and likelihood of detection in the scale of 1 to 3.

LOC\*IMPACT= Risk. Likelihood of occurrence of hazards, Severity & risk was calculated through means of evaluation by rating scale.

Likelihood of occurrence rating as- High means-3, Medium- 2 & Low- 1.

Impact is calculated as- Serious- 3, Major- 2 & Minor- 1.

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Risk rating is divided as <=6 then VACCP plan is required for raw material.

The PRN tool categorizes the information according to the following three criteria:

- Likelihood of occurrence of fraud/adulteration/Substitution/historical evidences / economical factor / ease of access of raw material through supply chain / availability of raw material
- Likelihood of detection of Geographical location / physical form / routine product testing / ease of access of supply chain / existing supplier control
- Profitability (i.e. how profitable the activity would be for a fraudster) – economic factor, ease of access, nature of raw material, availability of raw material, complexity and cost of committing the fraud.

Categorization of information gathered of raw material according to likelihood of occurrence, likelihood of detection and profitability.

Raw material risk analysis is evident as- Hazard analysis PS/15 dated 01.01.2025.

Key control is availability of both raw materials locally & pre-approval after inspection at supplier end and inspection again before unloading at site premises.

It was observed that Organization Top management is into this business from long time. These are typical agriculture based product controlled by Regulatory Bodies. No such substitution or adulteration/fraud issue was observed by the Senior management in this organization in recent years. On the basis of risk from raw material assessment- Low risk were identified. Risk covered were- Allergen contamination, Foreign body, Microbiological contamination, Chemical contamination, Aflatoxin, Vulnerability & Fraud. Marking is given from 01 to 10 as per experience of Sr. Management & risk associated with the Raw material. In-house checks are always performed before unloading of the raw material especially for foreign matters & Moisture% for every lot.

Documented supplier assessment, selection, approved criteria is also documented in SOP for purchase- SP/09 rev. 00 dated 01.01.2025. Supplier selection based on Past experience, Evaluation & review of questionnaire, sample approval, market reputation etc.

Approved supplier list ref. FSR/PUR/01, REV.00, DTD. 01.01.2025. Purchase is made through direct manufacturers and traders, auction wise. Packaging material suppliers are approved by the company on the basis of Past experience, market reputations and on-site audits.

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Vendor assessment is done. Suppliers are existing form initial of the business.

Kosher & Halal certificates verified

There is no claim for Kosher product claimed by the organization.

Traceability was checked & recorded in clause number 3.9 of report.

### 5.5 Product packaging

Packaging material specifications are documented & provided to the suppliers. Food grade certificates for primary packaging material are evident. Whenever packaging is received, it is checked by QC for conformance to specifications. The packaging materials received and unloaded, only if COA & food grade declaration is provided by supplier of that packaging material.

In-house Lab checks: FSR/PRD/02

- Packaging material (PP Bags)- M/s Moondra packaging. Checked for Dated:- 27.04.2025, Total quantity:- 1000 Qty, Invoice number:- 10597.

- Packaging Material (PP Bags)- From M/s Aadinath Polymers. Checked for Date:- 02.05.2025, Total quantity received:- 317 kgs Qty, Invoice number:-AP/2025-26/089.

Checked for PM External inspection

- PP Bags: Migration form External TMC laboratory Report Number:- TMC/25/04/161, dtd. 14.04.2025.

- Paper Bags: Migration form External TMC laboratory Report Number:- TMC/25/04/162, dtd. 14.04.2025.

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

SOP Procedure for inspection and testing- SP/20 issue 00 date 01.01.2025 is evident.

In-house lab space is provided for the regular Raw material and FG product inspections for Physical inspections, moisture, colour, grading, dimensions checks, Foreign material, unwanted grains etc.

There is no typical chemical or microbiology test facility at this site & these testing to be done by external approved labs only. This includes In-process test laboratory for online product checking also.

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Product is long shelf life product.

Lab is fully segregated from the production & storage areas. Drainage opens outside to the processing plant.

NABL approved labs are used for testing and calibration which are not performed internally.

Checked for RM incoming check record no. FSR/PRD/01:

Inward register verified for Raw material Psyllium Seeds from RM qty = 36450 kg, Raw material batch number:- PS/D29/25.

In-house Lab checks: FSR/PRD/02

- Packaging material (PP Bags)- M/s Moondra packaging. Checked for Dated:- 27.04.2025, Total quantity:- 1000 Qty, Invoice number:- 10597.
- Packaging Material (PP Bags)- From M/s Aadinath Polymers. Checked for Date:- 02.05.2025, Total quantity received:- 317 kgs Qty, Invoice number:-AP/2025-26/089.

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- PP Bags: Migration form External TMC laboratory Report Number:- TMC/25/04/161, dtd. 14.04.2025.
- Paper Bags: Migration form External TMC laboratory Report Number:- TMC/25/04/162, dtd. 14.04.2025.

External lab tests reports were checked:

- Psyllium Husk Powder- external TMC lab test report no. # TMC/25/05/323 dated: 27.05.2025 is evident. It was done for physical, chemical, Heavy metal & Microbiology testing as parameters
- Psyllium Husk external TMC lab test report no. # TMC/25/05/324 dated: 27.05.2025 is evident. It was done for physical, chemical, Heavy metal & Microbiology testing as parameters

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In-house Lab: FG test reports-

- In-house Lab test register is evident.

- Checked for product psyllium Husk powder, dated 18.04.2025 for domestic customer. Checked for Purity, Appearance, Identification, Total ash, Acid insoluble ash, Swell Volume, Moisture, Light extraneous matter, Sieves test - No deviation.

Verified as Water Test: Water Test report no. # TMC/25/04/165, DTD. 14.04.2025 from External Lab M/s TMC laboratory is evident. It was done against IS 10500:2012 requirements.

Swab & air monitoring verification for cleaning effectiveness is done as: Last was done from In-house microbiology Lab- fortnightly.

- Apron swab - report # TMC/25/04/154, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard..

- Hand swab - report # TMC/25/04/153, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard.

- Air monitoring, for RM Storage, Pre-cleaning, grinding section, Husk section, Powder section, FG storage area, - report # # TMC/25/04/155 to /160, dated: 14.04.2025,– TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard.

On-going shelf-life testing:

- Although, It was checked that on-going shelf life test report for product Psyllium Husk Powder- external TMC lab test report no. # TMC/25/05/323 dated: 27.05.2025 is evident. It was done for physical, chemical & Microbiology testing as parameters, next report Nov, 2025 and final report in May 2027 and after shelf life report in July 2027 – Shelf life 2 years.

Standard Test Procedures/Methods for inspection and testing are documented. Inspections are performed at receiving of raw material; during processing and final packed of the product.

### 5.7 Product release

QC n-charge is authorised for product Products are released only after proper approval from authorised personnel. Product release is through QC In charge/FSTL. FSTL is authorized for product release and Products are released only after proper approval from authorized personnel as per SOP of product release. Record FSR-PRD-09 checked for Products.

- Psyllium Husk batch no. PH/E06/25, packed in 25 Kgs x 406 PP Bags, total quality- 10150Kgs, dispatched on date 13.05.2025 in vehicle no. GJ12BX1589, Invoice number:- RIL/2025-26/04 to customer in India.

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•Psyllium Husk - lot / batch: PP/E18/25. Packing size: 25 Kg Bags, total dispatched qnty. = 10500 kg. Dispatch : 22.05.2025.Consignee in Gujarat, India– Domestic. Container/ vehicle : RJ19GK0730, INV. – RIL/2025-26/05

No CCP related deviation reported as on.Also, checked on-site for product Psyllium husk 85% Batch no. 23/016 during site visit.

Computerized data maintained.

Records

**5.8 Pet food and animal feed**

NA, Organization is not producing food for pet or animal feed.

**5.9 Animal primary conversion**

NA, as site do not completes primary animal conversion.

| Details of non-applicable clauses with justification |  |
|--|--|
| Clause/Section Ref                                   | Justification  |
| 5.3.3  | No rework as per site policy.                                    |
| 5.3.5  | No such product claims are made by the organization.             |
| 5.3  | NA as site does not handle any allergen.                         |
| 5.8  | NA, Organization is not producing food for pets or animal feeds. |
| 5.9  | NA as site do not completes primary animal conversion            |

**6. Process control**

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6.1 Control of operations

HACCP plan is developed for Production control & food safety as on dated 01.01.2025. Process is semi-automatic as system is provided for processing. Sieving through screens & Metal separation through magnets & Metal detector is online. The company has controls over process operations. This is evident from the long-time experience of production, experienced personnel, equipment installed, industry specific machinery and clearly documented procedures/ work instructions. Documented procedures and work instructions are documented & established accordingly that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan. Temperature and pressure control equipment are provided. Complete process is controlled through operation control procedures. On-line monitoring of equipment is designed with failure alert system. Critical equipment is controlled through control points and critical control points. Validation studies are performed for CCP. Effective monitoring of all process parameters is demonstrated by record keeping and consistent product quality. Daily processing record as production Gain/Loss report sheet available. Log sheets are maintained. SOPs & Work instructions are developed & established for control of operations. Processes were monitored. Where physical and chemical control is required, these are being monitored and controlled accordingly through regular testing of Raw material, In-process products and finished goods. Records are maintained as per Quality plan. Online checks for quantity verification including weight and grade checks are conducted as per the documented procedures, regulatory and customer's requirements. Online weight checks are performed for each and every bag before dispatch. Label/Printed bag checklist is evident. It covers Bag verification, weighing, 01st bag approval, Metal detector pass bags & Refused bag if any. Legislative requirements and customer requirements apply. Online checks for quantity verification including weight and grade checks are conducted at as per the documented procedures, regulatory and customer's requirements.

Sieving through screens, magnet passes & Metal separation is online. The company has controls over process operations. This is evident from equipment installed by the supplier, long-time experience of production as per this industry segment, experienced personnel, and clearly documented procedures/ work instructions.

Daily processing record available. Log sheets are maintained. SOPs & Work instructions are developed & established for control of operations. Work instructions for Drying, checked & found implemented.

Internal validation & Daily monitoring for the Metal detectors is performed. On the day of audit both were found in working condition.

6.2 Labelling and pack control

There is a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packaging machines. It is controlled by Senior Management, QC Lab Manager & Production Manager. Packaging material is approved by QC & then issued for production on daily basis.

Label checking is done by production & QC dept. both & final approval is given by QC dept. for product release. On-site label checks are performed as a part of production records. Record is maintained which

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includes Party name, Brand name, packing size, type of packing, seal check, pouch sealing, gross weight, net weight, batch number, packing date, best before. Random bags sample is checked & recorded by QC lab person.

Label checks by QC & production is done on-line & off line as per record. Checked for products:

- Psyllium Husk batch no. PH/E06/25, packed in 25 Kgs x 406 PP Bags, total quality- 10150Kgs, dispatched on date 13.05.2025 in vehicle no. GJ12BX1589, Invoice number:- RIL/2025-26/04 to customer in India.

- Psyllium Husk - lot / batch: PP/E18/25. Packing size: 25 Kg Bags, total dispatched qnty. = 10500 kg. Dispatch : 22.05.2025.Consignee in Gujarat, India– Domestic. Container/ vehicle : RJ19GK0730, INV. – RIL/2025-26/05

There is no typical product change over as final product is Psyllium only.

Product is to be released by FSTL/QC Lab or Management.

Daily Line clearance checks are performed by QC dept. FSTL & QC persons are authorised to verify the cleaning status & checks on daily basis. Ref. Daily line clearance record- FSR/PRD/45.

Other plant & equipments cleaning & sanitation records checked & evident are:

Daily premise cleaning- FSR/PRD/18B

Daily Plant Cleaning Record- FSR/PRD/18A

Daily Machine cleaning- FSR/PRD/17.

Magnet Cleaning record- FSR/PRD/34.

Daily Glass Items check record- FSR/PRD/35.

Machine Hygiene checks & clearance record- FSR/PRD/15A.

Plant sanitation audits are performed by HACCP team & checked as recorded.

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

Online checks for quantity verification including weight and grade checks are conducted as per the documented procedures, regulatory and customer's requirements. Online weight checks are performed for

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each and every bag before dispatch. Label/Printed bag control plan & checklist is evident as- FSR/PRD/07 as record. It covers Bag verification, Label verification & Printed information checks.

On-line weighing check record is evident as- FSR/PRD/36. Verify from May – June 2025 as on date.

It covers pack verification, weighing, 1st pack approval. Legislative requirements and customer requirements apply. Online checks for quantity verification including weight and grade checks are conducted at as per the documented procedures, regulatory and customer's requirement.

- Weight & Measure Dept.: State Govt. authorized agency does Legal metrology for all weighing scales as W&M legal metrology - certificate # 2549359/RAJ/2025/01 – valid till dtd. 12.04.2026 for weighing scale.

Daily in-house checked for weighing scales is done & recorded. FSR-PRD-06 weight machine calibration record practiced - check for the month of May – June 2025 – based on production. – no deviation reported.

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

The procedure is there for Control of monitoring & measuring devices calibration document no. SP/14 issue 00 dated 01.01.2025. SOP for calibration of the instrument is documented. Calibration includes laboratory and processing equipment including instruments used at CCPs. Calibration is done on annually basis.

Calibration is done on annually basis. Plan/List is evident FSR-PRD-16.

Verified Calibration certificate for process equipment.

Calibration certificates were checked as:

- Validation and Calibration test done by manufacturer for Metal Detectors & metal probes pieces evident as provided by PTCC/2504/016 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- Magnet on-line. Certificate no. PTCC/2504/015 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- Sieve Calibration - PTCC/2504/012 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- Moisture meter - PTCC/2504/013 done on date 06.04.2025 by External Lab- M/s P. Tej Calibration Centre & valid till 05.04.2026.
- W&M legal metrology - certificate # 2549359/RAJ/2025/01 – valid till dtd. 12.04.2026 for weighing scale.

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Regular verification is performed for all critical equipment as a part of based monitoring of equipment. Ref. Thermometer.

Master equipment's are traceable to national standard as per certificates.

| Details of non-applicable clauses with justification |  |
|--|--|
| Clause/Section Ref                                   | Justification  |
| 6.1.7  | No such by-products handled at this sites that is outside of scope of audit.                     |
| 6.2.4  | On-line vision type of equipment for label & print check is not provided by the site at present. |

| 7. Personnel  |
|---|
| 7.1 Training: raw material handling, preparation, processing, packing and storage areas   |
| <p>SOP for Training is documented as- SP/12 dated 01.01.2025. SOP for recruitment including induction is included &amp; available.</p> <p>List of employee- FSR/HR/01 is evident.</p> <p>Skill Matrix/Training need identification is evident as- FSR/HR/02.</p> <p>Job specifications &amp; descriptions are defined in the BRC manual dated 01.01.2025.</p> <p>Training calendar for financial year 2025 covers training on BRC awareness, CCPs, OPRPs, Allergen awareness etc. Existing employees receive trainings twice per year.</p> <p>Training attendance sheets are available for Name of trainee, Dates &amp; Duration, Title, Trainer details. Record number- FSR/HR/03.</p> <p>Total of 16 types of training are decided &amp; all 15 training were conducted till date, for the FY of 2025 for all employee / staff.</p> <p>•BRCGS &amp; HACCP training was given on date 11.01.2025 &amp; 02.04.2025 for 06 &amp; 04 Hrs respectively to FST &amp; Staff member by External Consultant.</p> |

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- Sanitation, House Keeping & Personal Hygiene training was given on date 13.01.2025 to Workers & Staff member by External Consultant.
- Supplier selection & Approval training was given on date 12.01.2025 to Workers & Staff member by External Consultant.
- Allergen awareness training was given on date 15.02.2025 for 02 Hrs to Workers & Staff member by External Consultant.
- Site security & Food defence training was given on date 07.03.2025 for 02 Hrs to Workers & Staff member by External Consultant.
- Labelling & packing control training was given on date 11.05.2025 for 01 Hrs to Workers & Staff member by External Consultant.
- Food safety culture training was given on date 19.06.2025 for 02 Hrs to Workers & Staff member by External Consultant.
- Confidential reporting training was given on date 18.06.2025 for 02 Hrs to Workers & Staff member by External Consultant.
- Covid-19 training was given on date 08.03.2025 for 02 Hrs to Workers & Staff member by External Consultant.

Organisation regularly reviews the training needs of the employees through competency matrix of employee. This is identified by internal developed methods and procedure. This includes skill mapping, HODs feedbacks, Job performance. Training committee is established to take decisions.

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

Documented personnel hygiene and Jewellery Procedure SP-25 dated 01.01.2025 are exists and communicated to all the employee through instructions & display boards.

Policy for Personal Hygiene & Jewellery Policy PS-01-PH dated 01.01.2025. Visitor policy is documented as doc no. PS-01-VP dated 01.01.2025. SOP for entry in production area is displayed in change room. Monitoring is done for effectiveness. Watches and other loose jewellery are not permitted in the production area. Fingernails should be trimmed and cleaned. False fingernails are not permitted. Perfume or aftershave is not permitted. Mobile cell phones are not permitted.

Hand cleaning is performed before entering to the production area with sanitization and periodic sanitation is in practice for workers in packaging area by using alcohol based sanitizer (70% IPA) at regular frequency.

First Aid room is provided in case of medicine is to be given to staff, which is away from processing area.

If people are found to have cuts and wounds, they are not allowed to enter the production area as per written and displayed instructions. There is no use of blue colour metal plaster.

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Plaster containing metal is not in use. Company does not allow any personnel with cuts and wounds in the processing area.

Compliances are checked during the on-site audit & found meeting the requirement. Daily personal hygiene checklist record- FSR/PRD/20 is evident – verified the same for the month of May – June 2025 as on date.

Sanitation, House Keeping & Personal Hygiene training was given on date 13.01.2025 to Workers & Staff member by External Consultant

Swabs & Air Monitoring: Test report from external Laboratory M/s- TMC Lab

- Apron swab - report # TMC/25/04/154, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard..

- Hand swab - report # TMC/25/04/153, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard.

However, Minor NCR – 8 is raised in this audit as [7.2.1]: Jewellery control not found effectively practiced as one of the staff members found with the hand jewellery.

### 7.3 Medical screening

The medical screening is done for each and every employee on monthly basis. This is covered in the personnel hygiene. The detailed medical screening is carried out for all the workers- Schedule 4 of FSS Regulations 2011.

The company has a system of screening of its employees for medical criteria. Voluntary declaration also encouraged for any communicable disease. The company has documented medical screening procedures is there. Medical screening is conducted at hire and when necessary. Medical examination has been conducted for all employees as per local regulations on 21.05.2025, this must be done at least once in a year. The examination has been carried out for the permanent as well as temporary employees. No cases of unfit employees seen. Visitors are required to answer the medical questionnaire.

Visitor policy is documented as doc no. PS/01-VP dated 01.01.2025. SOP for entry in production area is displayed in change room. Monitoring is done for effectiveness.

Last medical screening was done on date 21.05.2025 for all employees. Employee health check-ups done & records evident. Health Check-up was done by Dr. B. Dera Shree [Reg. 5769].

Verified health check-up records dated 21.05.2025 for Mr. Rajesh, Mr. Majit, Mr. Chetan Vyas – Staff.

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Vaccination performed for the TT- as required.

Visitor entry is control at security gates. The visitors had been asked for the medical declaration maintained at office to plant. On the day of audit it is practices with the auditor.

If not complying, person is not allowed in the production facility.

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

The procedure is there for the personnel hygiene having document number PS/01PH, Dated 01.01.2025.

Visitors and contractors are issued protective clothing before entry into the production facility. Protective clothing worn is apron, cap, mouth mask and shoes. Protective clothing is as appropriate to food processing units. Hygiene instructions were displayed in prominent positions. The adequate segregation was evident between clean and unclean clothing's.

- Sanitation, House Keeping & Personal Hygiene training was given on date 13.01.2025 to Workers & Staff member by External Consultant.

Laundry- Laundry contract with M/s- Krishna Laundry, contract dated 01.01.2025 till 31.12.2025 for washing aprons. Laundry was audited by QC In charge on 06.04.2025 as per record no. FSR/MNG/13. Monitoring record- FSR/PRD/38 of the effective cleaning of the protective clothing at the time of receiving from laundry.

Cleaning validation done through SWAB tests. Verification was done through swab tests from external agency lab. Last was done & evident as:

- Apron swab - report # TMC/25/04/154, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard..

- Hand swab - report # TMC/25/04/153, dated: 14.04.2025 – TPC, Y&M, Coliform, E.coli, Salmonella – as per the standard.

Daily shift wise protective clothing is being changed.

Gloves are not in use.

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Personal protective clothing that is not suitable for laundering is provided for Use & throw type only.

| Details of non-applicable clauses with justification |   |
|--|---|
| Clause/Section Ref                                   | Justification   |
| 7.2.3  | If people are found to have cuts and wounds, they are not allowed to enter the production area as per written and displayed instructions. There is no use of blue colour metal plaster. |
| 7.2.4  | Plaster containing metal is not in use. Company does not allow any personnel with cuts and wounds in the processing area.   |
| 7.2.5  | Other than company own medical services there is no permission to use of the personnel medicines.   |
| 7.4.5  | Gloves are not in use.  |
| 7.4.6  | Personal protective clothing that is not suitable for laundering are provided for Use & throw type only.  |

|                        |               |              |          |              |
|------------------------|---------------|--------------|----------|--------------|
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|  |
|--|
| <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**

|                        |               |              |          |              |
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| Clause/Section Ref | Justification |
|--------------------|---------------|
|                    |               |

|  |
|--|
| <b>9. Requirements for traded products</b>   |
| 9.1 The food safety plan - HACCP   |
| Not applicable   |
| 9.2 Approval and performance monitoring of manufacturers/packers of traded food products |
| Not applicable   |
| 9.3 Specifications   |
| Not applicable   |
| 9.4 Product inspection and laboratory testing  |
| Not applicable   |
| 9.5 Product legality   |
| Not applicable   |
| 9.6 Traceability   |
| Not applicable   |

|   |
|---|
| <b>Module 11: Meat Supply Chain Assurance</b> |
| 11.1 Traceability                             |
| 11.2 Approval of meat supply chain            |

|                        |               |              |          |              |
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11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training

**Module 13: Meeting FSMA Requirements for Food – July 2022**

Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33)

Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1)

Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11)

Sanitary Transportation: 21 CFR Part 1 Subpart 0 (Clauses 13.4.1 – 13.4.9)

Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18)

**14.1 Additional Specifier Requirements**

14.1 Traceability

14.2 Environmental Monitoring

14.3 Product inspection and laboratory testing

14.4 Protective clothing: Employees or visitors to production areas

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