

# Technical brochure



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# About us

Cambridge Commodities specialises in supplying nutritional ingredients and product solutions to the sports nutrition, health & wellbeing, pet nutrition and food & beverage industries. With over 22 years' experience in quality and sourcing, we provide 2500 different ingredients to help our customers create market-leading products through our commitment to quality, service and innovation.

Our mission is to passionately provide quality nutritional ingredients and healthier innovation to improve wellbeing worldwide.

## Quality

Our quality team is your quality team.

We are dedicated to providing customers with the highest quality nutritional ingredients to make the best possible products. This mission starts by ensuring that high standards are met at every step in the supply chain, from origins within approved supplier factories to arrival at our warehouse, then onto the customer.

Our friendly and knowledgeable team is on hand to provide support for all technical queries plus product information, labelling and health claim guidance. We are constantly maintaining and updating our portfolio of quality accreditations which includes BRC Food 8, informed manufacturer, halal, kosher and organic.

# Company contacts

## Company address

Cambridge Commodities  
203 Lancaster Way Business Park,  
Ely, Cambridgeshire,  
CB6 3NX  
United Kingdom

EC approval Number: UK AO 021 EC

## Senior management details

Name	Title
James Stevens	CEO
Tom Stevens	Operations Director
Neil Hammill	Commercial Director
Ian Mitchell	Finance Director
Simon Mortimer	Sales Director

## Quality contacts

**Name:** Becky Ryder  
**Title:** Head of Quality & Technical

**Name:** Dr Hannah Pritchard  
**Title:** Quality Manager

**Name:** Phil Barnhill  
**Title:** Quality Manager

**Email:** [technical@cambridgecommodities.com](mailto:technical@cambridgecommodities.com)

**Email:** [QC@cambridgecommodities.com](mailto:QC@cambridgecommodities.com)  
**Email:** [analytical-team@cambridgecommodities.com](mailto:analytical-team@cambridgecommodities.com)  
**Email:** [support@cambridgecommodities.com](mailto:support@cambridgecommodities.com)

**Purpose:** Technical queries, regulatory advice, questionnaires  
**Purpose:** Product documentation requests  
**Purpose:** Product testing  
**Purpose:** All aspects of customer care

# Products & services

## Regulatory advice

Our QA team is on-hand to advise and provide information on European and local regulations. We work with several independent bodies to ensure the information we provide is correct at the time of sharing and as accurate as possible. We work with the following organisations to ensure the information and advice we provide is accurate and up-to-date:

- Campden BRI
- Trading standards
- Novel food enquires
- Chemwatch

## Extensions

Our analytical team can offer an extension for products close to, or past its expiry date. By conducting product tests including micro testing, moisture testing and assay testing, we can add an additional six months to one year to your material.

Please note that there may be charges involved with this service.

## Repacking quantities

Cambridge Commodities offers all product in all sizes to suit the needs of our customers. We can repack to small quantities depending on customer requirements. All repacking is performed in our ISO Class 8 Cleanrooms where all quality aspects have been assessed and validated.

## Downloadable certificates of analysis and technical dossiers

As part of our commitment to improving customer service, Certificates of Analysis are available to download from our website. Please see the link below:

[www.cambridgecommodities.com/quality](http://www.cambridgecommodities.com/quality)

Here you will be able to download your raw material Certificate of Analysis (C of A) as soon as you receive your despatch note.

To log in add the following details:

**Username:** quality  
**Password:** matters

\*Please note that because of Microsoft Office limitations, we can't include any of the following symbols when saving documents: \ / : \* ? < > |

Please leave a space for any of the above symbols which may appear in your batch number. If you have any questions, please call or e-mail our QC group at [cclqc@cambridgecommodities.com](mailto:cclqc@cambridgecommodities.com) who are more than happy to help.

Our technical dossiers are also available to download from our website. Please see our catalogue of products and download the technical dossier if available.

[www.cambridgecommodities.com/products/ingredients.htm](http://www.cambridgecommodities.com/products/ingredients.htm)

# Industry accreditations & memberships

We are committed to meeting quality standards required from clients across a variety of industries and are dedicated to maintaining an up-to-date and relevant portfolio of accreditations to support this.

If you are interested in a raw material and it currently does not have halal, kosher, FEMAS, organic or informed sport status. Please get in touch with us and we can investigate certifying them. Please be aware that some products may not be applicable for certain certifications.

## BRC Food 8

Issue 8 has been developed to specify the food safety, quality and operational criteria that are required to be in a place within a food manufacturing organisation. It aims to fulfil obligations in regards to legal compliance and customer protection.



Issue 8 focuses on the implementation of good manufacturing processes, in particular, labelling and packaging. Another key focus is support for quality management systems as well as Hazard Analysis and Critical Control Point (HACCP) based food safety programmes

## FEMAS

FEMAS helps to maintain the protection of animals that consume the feed ingredients and the humans who consume products derived from these animals. In order to comply, a thorough audit and inspection by an independent certification body must take place, showing compliance with both Hazard Analysis and Critical Control Point (HACCP) and Good Operating Practice procedures.



All major products we sell to the animal industries are FEMAS accredited. Furthermore, our site operates a NOPS awareness policy to minimise the risk of cross contamination.

## GMP+

The GMP+ Feed Certification scheme aims to support companies to deliver safe feed, thus contributing to the production of safe food. GMP+ certification provides customers peace of mind we are providing ingredients that are safe for feed.



## Soil Association Organic

We have Organic status with approval from both DEFRA and The Soil Association for a number of products. This lengthy process involves obtaining organic certificates and detailed information from manufacturers, ensuring packaging is food grade and proving all compound ingredients in products are organic.



## Sedex

Sedex is home to one of the world's largest collaborative platform for buyers, suppliers and auditors to store, share and report on information quickly and easily. The platform is used by more than 40,000 members in over 150 countries to manage performance around labour rights, health & safety, the environment and business ethics.



## Halal

Halal certification requires all food, equipment, storage and manufacturing processes to be cleansed according to Islamic law. Cambridge Commodities has a number of ingredients that are approved by The Halal Trust.



## Kosher

Kosher certification requires a partnership with a respected rabbi who will act as a guide for how kosher products should be made. In order for a product to be certified, it must adhere to strict manufacturing and packaging rules throughout its production.



## Informed Manufacturer

Cambridge Commodities is now an Informed Manufacturer, part of the LGC's Informed certification programmes.



This means our site is routinely audited and swab tested to minimise inadvertent contamination with prohibited substances in sport. The Informed Manufacturer is a global quality assurance programme that helps to minimise the risk of banned substance contamination within facilities that manufacture and supply sports nutrition products and ingredients. Our site was tested and a review of our standard operating procedures was taken place and we passed.

## ISO 14001

ISO 14001 means having a system in place to help us manage our impact on the environment. This can be through reducing the amount of waste we put into landfill or by reducing the amount of electricity we use. People are also part of the environment and they need to be protected too, through proper health and safety protocol when dealing with products or being safe in the warehouse.



## ISO 22000

ISO 22000 is an international standard that defines the requirements of a food safety management system covering all organisations in the food chain from "farm to fork". It is based on Hazard Analysis and Critical Control Point (HACCP) as the main tool for identifying risks and their associated controls.



**FDA number: 16806073982**

# Quality management system

CC operates a Quality Management System in compliance with several accreditations such as BRC Food 8 and ISO22000, as well as the Food Safety Act 1990.



Approved factories



Testing procedures



Accredited facility



Technical documents

## Quality policy

The Quality Manual is regularly reviewed to facilitate continuous improvement and to ensure its maintenance and applicability to the operation of Cambridge Commodities. All aspects of the process which may influence quality and product safety are covered by written specifications or procedures that are in accordance with our accreditation standards and regulatory standards.

All employees receive both on-the-job and procedure based training, and regular audits will be carried out to ensure compliance. Well-trained and highly motivated staff are integral to the success and development of the company.

Cambridge Commodities has a zero-tolerance policy for genetically modified or irradiated goods.

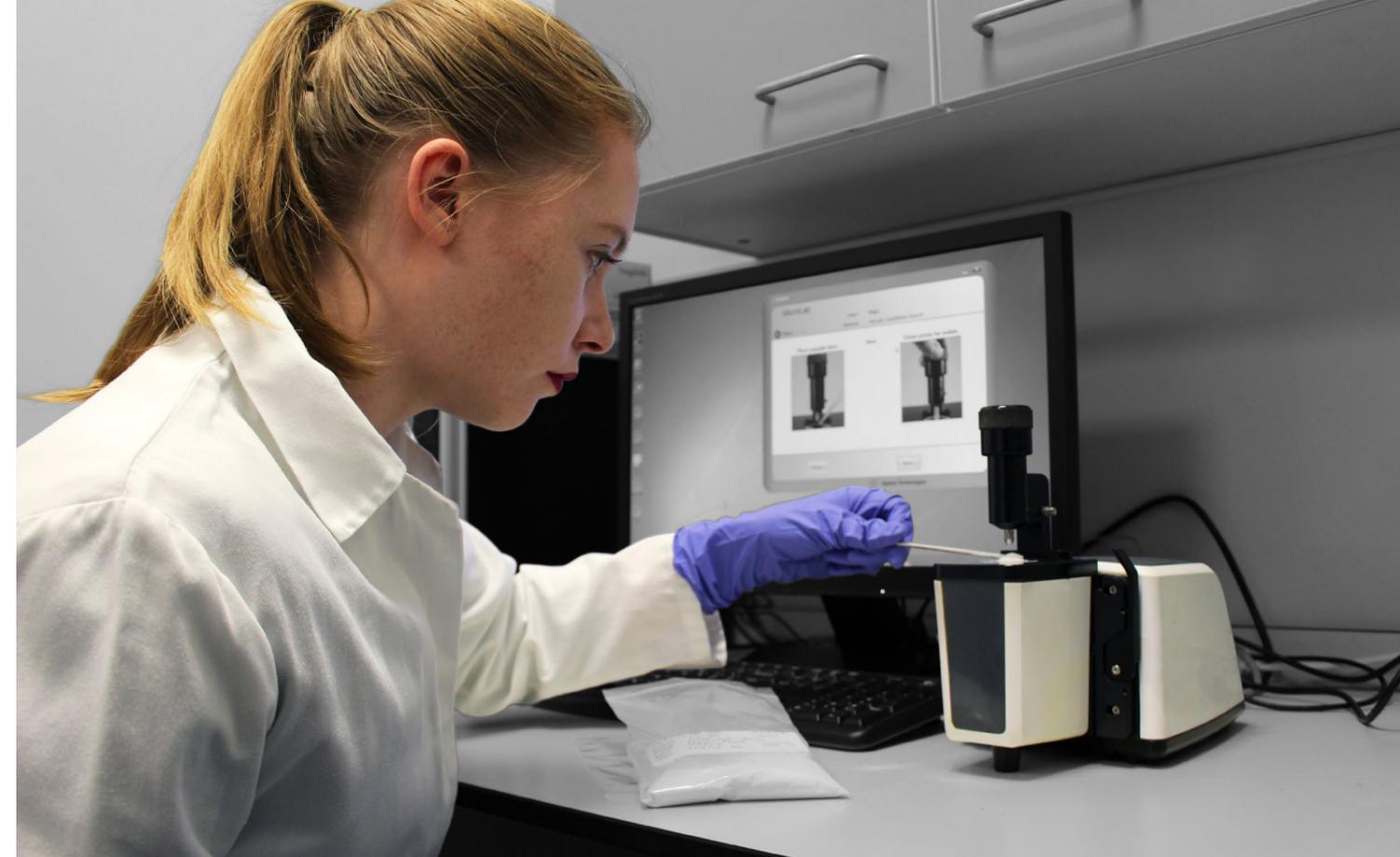
## Audits

We currently have six lead auditors on-site trained to ISO standards. This enables us to carry out effective and detailed site audits of our suppliers to ensure they meet the high level of quality Cambridge Commodities expects.

Internal audits are conducted based on risk. We currently audit all high-risk processes at Cambridge Commodities.

## Management review

The senior management team meet monthly to discuss departmental performance, upcoming news and future improvements. It allows members of the board and senior management to collaborate on the direction each department is taking and checking it is in line with company goals and values, as well as allowing discussion and debate for continuous improvement.



## Control of documents

Written procedures are established and maintained for the identification, collection, indexing, filing, storage, maintenance and disposition of controlled documents. This includes control of documents of external origin that are part of the quality management system (QMS).

Any documents that affect the QMS are reviewed and approved by the quality team. Electronic signatures are used and controlled to provide equivalent security to that of a handwritten signature.

## Control of records

A record is any document that has had information added to its contents. Written procedures are established and maintained for the identification and control of records as per the above procedure. Records are kept on our system and archived when out-dated.

Records are filed in such a way that they are easily retrieved and not subject to environmental damage. CC ensure that where possible, all files are saved electronically and backed up on an external server for protection.

## Change control

Procedures are established and maintained to evaluate and approve changes that may have an impact on the quality of the material (e.g., changes to excipients or packaging and the product sources, material specification, test methods, manufacturing and analytical equipment and production processes).

All relevant people are informed and contacted if a change is made to the purchased material. Our QC team will send communication detailing the changes that have been made. If changes cannot be accepted, we endeavour to resource material suitable for our customer's needs.

# Supplier approval process

We endeavour to source any ingredient on request and have procedures in place to ensure that new suppliers and materials meet our stringent quality standards.

New manufacturers must complete a verification process to become accredited. The process consists of a meticulous questionnaire and thorough sampling of the material before approval.

The raw material questionnaire is a comprehensive assessment of the product with the primary aim of proving that what we're buying from the supplier is the promised material. It also ensures that the product complies with legislation and includes questions of sourcing, processing, allergens, site information, possible contaminants, GMO and BSE/TSE status among others.

Samples of new materials are obtained from suppliers and are thoroughly checked using a variety of methods including FTIR and external testing before they are approved as a stock item.

The verification process ensures that we have all the information needed to properly understand the product which allows us to provide a fully detailed technical dossier.

## General quality assurance and compliance

Cambridge Commodities trade all food-grade products in strict compliance with European Food Law with a particular focus on hygiene and safety standards. Our site is in accordance with the requirements of Regulation (EC) No 178/2002 "laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety". Hygiene provisions follow Regulation (EC) No 853/2004 "on the hygiene of foodstuffs".

For pesticide residues, compliance with Regulation (EC) No 396/2005 "on maximum residue levels of pesticides in or on food and feed of plant and animal origin" is the ensured benchmark and verified by obtaining supplier assurances. We further conduct verification testing periodically for product deemed high risk.

Further contaminants that are often associated with food products and for which Regulation (EC) No 1831/2003 sets provisions for are checked for compliance by our approval team. This applies, for example to nitrate, mycotoxins, 3-MCPD, dioxins, polychlorinated biphenyls, polycyclic aromatic hydrocarbons (PAH), solvents (apart from water), acrylamide, antibiotics or melamine. Our approval team will risk assess whether the material may be at risk for those contaminants and obtain assurances or testing from our manufacturer.

## Compliance statements or certificates

All products are provided with a technical dossier or specification with further information available on request.

# Product control

Following the approval of a raw material, the product is ordered and received in the warehouse. The warehouse operatives make the following checks:

- Cleanliness of the vehicle
- Integrity of the packaging
- Labels are correct and contain required information

This is the first line of control at CC to ensure that the material received is correct and the information on the label matches the information provided by our supplier. Once the warehouse operative has finished their check of the goods, the material is marked with coloured cones to indicate to the quality control team that the material needs to be QC released. The sampling team check the following:

- The labels are correct
- The material is sealed correctly
- The material is free from metallic particles
- The material has not been tampered with
- There are no visible defects in the material

The samples taken are then passed to the team in the lab who visually compare the sample against previous samples received, and then FTIR the material to ensure it is chemically the same.

Our quality control team will check supplier's certificates of analysis against the agreed specification. If this is all correct and they are satisfied with the information supplied, the material will pass the QC C of A check.

If the product passes all the inspections, relevant team members make notes on our bespoke purchase-sales system. The product is then released and made available for sales allocation. During goods out, product labels are checked and the vehicle is inspected to ensure it is fit for food products. Goods are then transported to the end destination.

In the case where a product fails the inspection, the material is passed to the customer care team where the stock is either moved to quarantine or placed on hold to prevent the material from being released. Once the material is placed on hold, the manufacturer is contacted to obtain a root cause of the issue. Once a root-cause has been found, the decision on the product status is made.

**A simplified flow chart of this process is available on the next page.**

**Cambridge Commodities carry out detailed risk assessments for materials however, we cannot make this guarantee from the supplier perspective. We do as much as we can to reduce the risk and make it as low as possible in the supply chain however, we do not control the manufacturing sites.**

Product received at Goods In

- QC Inspector
- Takes samples
  - Magnet check for contamination
  - Checks visually against C of A
  - Checks visually against retained sample
  - Checks mesh size if it looks different
  - FTIR check for batch consistency

Record QC approval

Store retained sample

Pass

Fail

Product approved for sale

Quarantine and investigation

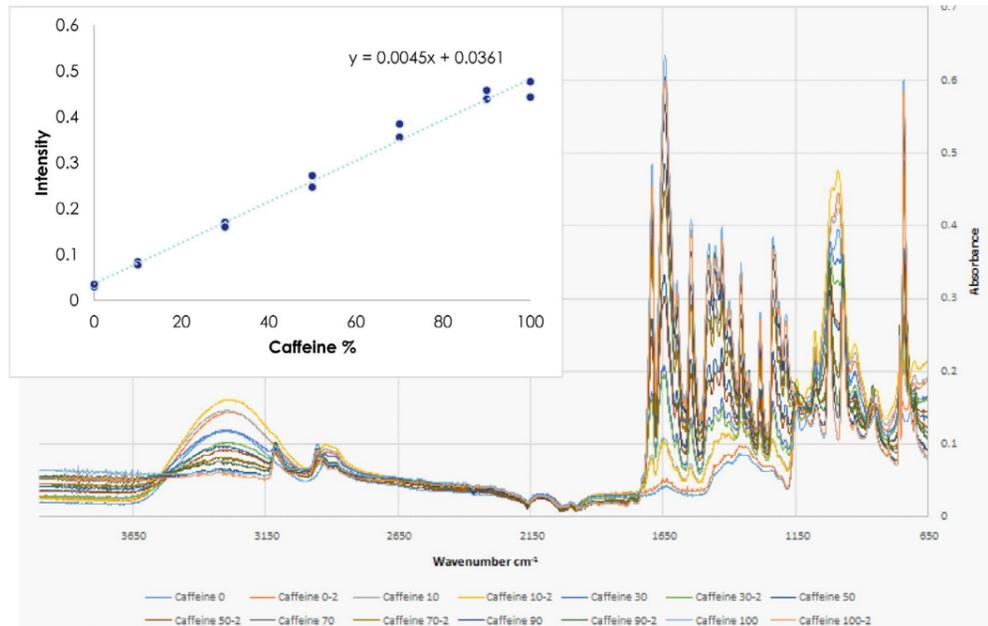
# Testing

Every batch of product that arrives in our warehouse is subject to FTIR testing. This provides us with a chemical fingerprint of the material to confirm the chemical structure of the product is as expected.

The following graph displays an FTIR investigation. It shows the spectrophotometric response of a product with different strengths of caffeine.

The result shows that at a higher concentration of caffeine, the absorbance increases. It is also visible that despite the differences in concentration, the inflection peaks remain stable, showing us the samples are all caffeine.

## FTIR



The graph displays an FTIR investigation. It shows the spectrophotometric response of a product with different strengths of caffeine.

Further testing will be carried out during approval if required.

## Pesticides

To ensure the organic status of our certified products, we work closely with the Soil Association to monitor the pesticide levels to ensure regulation compliance.

In addition to this, our analytical team test any product deemed as high risk for pesticides (for example green tea,) to ensure they meet the EU requirements for conventional products.

## Microbiological testing

CC perform microbiological testing on high risk materials such as flours, powders or finished products. We perform further microbiological testing during our approval stage to verify the supplier specification.

We work closely with our laboratories to ensure that the microbiological testing is as accurate as possible. Whether this be through our sending of composite samples, or multiple samples to ensure that a clear picture of microbiological load can be garnered and risk assessed.

### Carbon dating

As part of authenticity testing, where it is deemed necessary during approval, a product may be sent for C-14 testing to check whether the material is of natural or synthetic origin. This allows us to effectively check whether a material has been adulterated with a synthetic substance and labelled as a natural product. This provides food fraud assurances to customers as well as the end consumer.

### Allergenic protein testing

Products cannot be labelled as free-from unless the appropriate testing to show compliance has been carried out. For example, a product cannot be labelled as gluten free unless it contains less than 20ppm of gluten. Cambridge Commodities is happy to offer a service\* where we will batch test products to ensure free from status (where possible).

\*Please be aware this service may be charged.

### PAH

During the approval stage all products are risk assessed for PAH contamination based upon the drying methods our suppliers use. We check various notification portals to look for a history of contamination to ensure testing will not be required upon goods in. If we deem the supplier or the product as high risk, (for example: activated charcoal) it will be sent for PAH testing to ensure compliance to EU regulations.

### Informed Manufacturer

Cambridge Commodities is now an Informed Manufacturer, part of the LGC's Informed certification programmes.

Cambridge Commodities was the first nutritional ingredient supplier to achieve Informed-Sport site registration in the UK. We recommend that all sports nutrition customers test and register their products with Informed-Sport.



# Facilities

### Warehouse facilities

Our site is approximately 100,00sq.ft and our warehouse makes up 80,000sq.ft of this space. With 9,000 pallet spaces, we hold thousands of ingredients to ensure stock is available to suit your needs.

To help us to safeguard the materials against heat and moisture, and to ensure that our materials are always stored to our agreed specifications, our warehouse temperature and humidity is regularly monitored. The average temperature in winter is 10°C and during the summer months it is 20°C.

Our warehouse has been inspected by the local environmental health officer to ensure it is suitable for our purposes and passed this inspection. Our health mark is: AO 021 EC.

### Production facilities

Our ISO Class 8 cleanrooms have been designed to remove as much risk from our repacking processes as possible. We use an integrated door locking system for access to the cleanroom via the warehouse. No door can be open between the areas at any one time, thus minimising the risk of contamination.

Each work station is separated by an easy-to-clean, smooth, plastic divider, minimising the impact of open product at work stations. They are equipped with nederman extraction arms allowing the operative to place the unit in the best position. Cross-contamination is reduced by air being pushed downward and out of the cleanroom.

All aspects of quality and hygiene have been tested to ensure our cleaning and extraction methods are effective.

# Storage, stock management & transport

## Storage

All of our raw materials are stored in our warehouse. Storage conditions are such that the products are protected against physical, chemical and microbial contamination as well as against deterioration of the food/feed and packaging. Aisles are kept clean, clear and fit for purpose.

The recommended storage conditions for the majority of our products is to ensure the material is stored in the original sealed container, in a cool dry place away from direct sunlight and moisture.

## Stock management

Our stock management system operates on a 'first in first out' basis to ensure stock does not sit in our warehouse for long periods of time. However, if customers have specific shelf-life needs, this will be added to our system and adhered to, ensuring you only receive a material with a shelf-life that suits your requirements.

All materials entering the Cambridge Commodities site will be given a unique pack ID and barcode which is added to our bespoke stock control system, providing full traceability from the manufacturer to the customer. This allows us to use a computer-based system to ensure a product is not released for sale until quality checks have passed, as well as blocking stock for sale if it has failed.

Products awaiting inspection are labelled as such in our warehouse to ensure quality controllers are aware of which products are awaiting inspection.

We work with our suppliers to ensure that Cambridge Commodities product labels are added to the packaging where possible. This allows us to provide the following information on the product label:

- Manufacture date
- Expiry date
- Product name and product code
- Batch number
- Bar code

## Transport

Transport services are sub-contracted from suppliers selected on their ability to respect our transport conditions which comprises of specific requirements for food protection. Vehicles are clean and checked prior to loading.

# Traceability systems

Under EU law 'traceability' is the capability to track any material through all stages of production, processing and distribution. Traceability is a way of responding to upcoming issues and allows us to identify if the material is safe to consume.

It is vital to the safety of consumers and our customers that if a risk is identified, we can trace this through our system to check whether our material is affected by the identified issue.

All materials entering the Cambridge Commodities warehouse are booked in via our warehouse management system (WMS) and given a unique barcode and pack ID label. This means material can be traced from the moment it is booked into our warehouse, to when it is delivered to our customers.

Our bespoke purchase/sales system is linked to our WMS meaning all orders to suppliers and customers are linked to the batch that is delivered. Traceability through the supply chain, using our systems, is achievable in less than one hour.

## Specific requirements

There are also distinct traceability rules for genetically modified organisms (GMOs), which ensure that the GM content of a product can be traced and require accurate labelling so that consumers can make an informed choice.

Cambridge Commodities ensure that we check the GM status of ALL material entering our warehouse. If we find a specific material may be at risk of genetic modification, we will obtain an IP certificate.

## The Rapid Alert System for Food and Feed (RASFF)

During approval all materials are checked on the RASFF portal for any warnings. If, during this stage a product is identified on this portal, we will send it for testing to check our material does not hold the same risks.

The RASFF portal allows information of potential risks to be shared quickly, allowing corrective and preventative actions to be implemented easily.

# Allergen awareness

In accordance to the FSA guidelines on allergen management, CC recognise the following as allergens:

1. Cereals containing gluten – wheat, rye, barley, oats, spelt, kamut
2. Crustaceans
3. Egg
4. Fish
5. Peanuts
6. Milk
7. Nuts – Almond (*Amygdalus communis* L.), Hazelnut (*Corylus avellana*), Walnut (*Juglans regia*), Cashew (*Anacardium occidentale*), Pecan nut (*Carya illinoensis* (Wangenh.) K. Koch), Brazil nut (*Bertholletia excelsa*), Pistachio nut (*Pistacia vera*), Macadamia nut and Queensland nut (*Macadamia ternifolia*)
8. Soya
9. Sesame
10. Celery
11. Mustard
12. Sulphur dioxide and sulphites (E220, E228) at levels > 10mg/kg or 10mg/litre
13. Lupin
14. Molluscs

The only allergens that have a legal maximum limit are gluten, sulphur dioxide and sulphites. The allergen status for all products is stated in our technical dossiers where applicable.

The remaining allergens have no defined maximum limits, hence good manufacturing practice (GMP) is employed, where products are handled for sampling or repacking operations.

Cambridge Commodities responsibly source ingredients from reputable suppliers whose allergen status is known.

Allergenic materials are stored in the Cambridge Commodities warehouse together with non-allergenic products. However, this practice has been carefully risk assessed via the HACCP plan and both warehouse practices and product packaging are such that the risk of cross contamination is adequately controlled. Our cleaning methods for allergen removal have been verified and validated to ensure they are effective.

For more information on allergens please visit:

<http://www.food.gov.uk/multimedia/pdfs/maycontaininguide.pdf>

The following information indicates the presence or cross-contamination risk of substances or products causing allergies or intolerances, as listed in Regulation (EU) No 1169/2011 Annex II

- A. On site
- B. Present in material – mandatory labelling may not be required
- C. Used in repack room
- D. Stored in sealed products
- E. Permitted in designated kitchen areas
- N. Not Present

Allergen	Status	Details	Contamination risk
Cereals containing gluten and products thereof	A	C, D, E	Low
Crustaceans and products thereof	A	C, D, E	Low
Eggs and products thereof	A	C, D, E	Low
Fish and products thereof	A	C, D, E	Low
Peanuts and products thereof	N	N	Low
Soybeans and products thereof	A	C, D, E	Low
Milk and products thereof	A	C, D, E	Low
Nuts and products thereof	A	E	Low
Celery and products thereof	A	C, D, E	Low
Mustard and products thereof	A	E	Low
Sesame seeds and products thereof	A	E	Low
Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO <sub>2</sub> .'	B	C, D, E	Low
Lupin and products thereof	N	N	Low
Molluscs and products thereof	A	C, D, E	Low

## Justification for low risk status:

CC has strict procedures on site to ensure the cross-contamination risk is as low as possible. During storage we ensure that the packaging integrity is as such that the material will not be contaminated during storage.

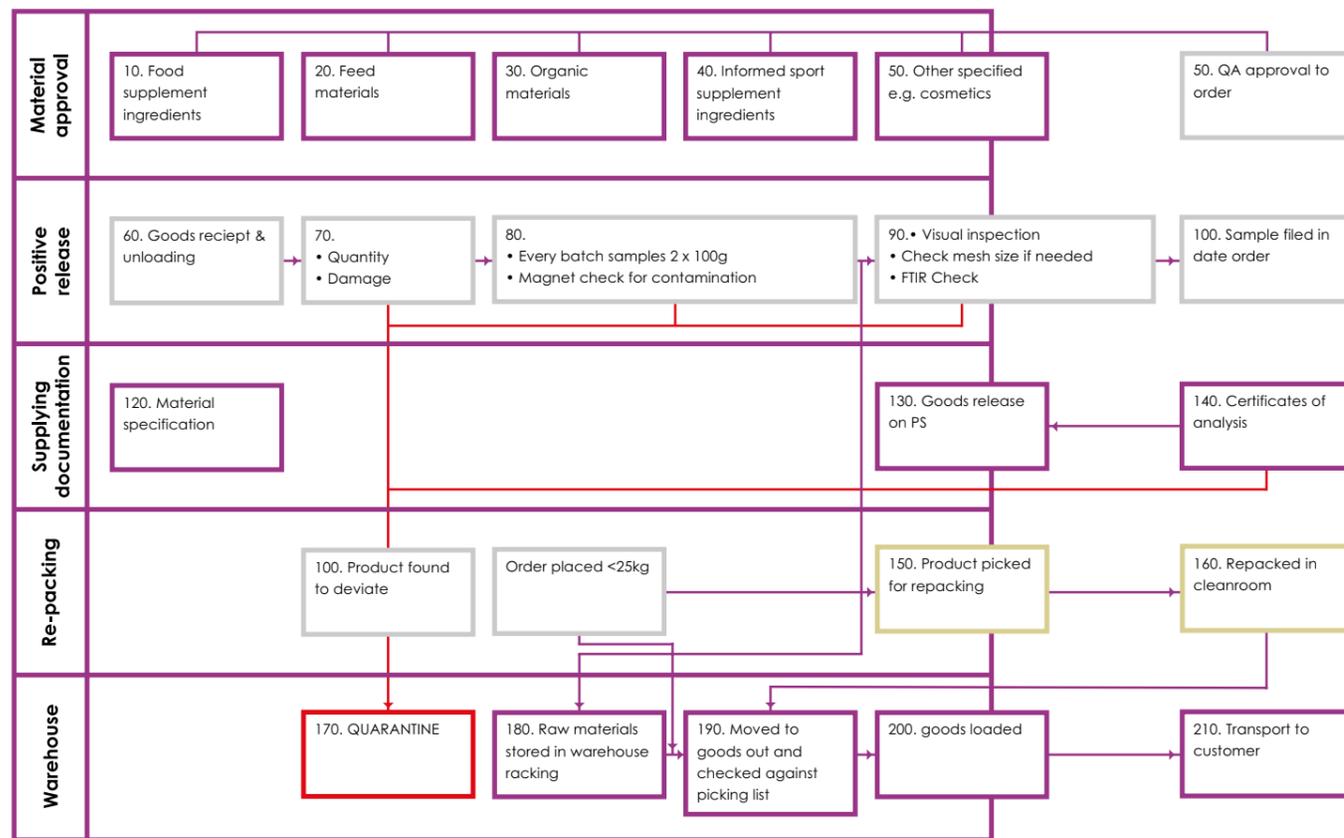
All materials entering in drums and boxes are double bagged to minimise damage risks.

During our repacking process only one product is open at any one time at a workstation. Our cleaning methods are practised before and after each repack. The cleaning methods have been validated to ensure effective removal of allergenic proteins.

We test the air quality annually to check for particulates and ensure they are at a low enough level to prevent the contamination of allergenic material.

**The allergen information for each product is supplied by the manufacturer and we have not tested for each individual allergen to ensure they are not present. The information given is based on a documented risk assessment and is accurate to the best of our knowledge. If you intend to make a voluntary “free from” claim on your pack, additional testing may need to be carried out. For technical and labelling guidance you should always speak to the competent authority for the market or member state in which the final products are placed.**

# HACCP



## HACCP team

There are five members of staff in our HACCP team. The team are currently HACCP aware or trained to HACCP level two. All members are aware of their roles and responsibilities in the HACCP team.

## HACCP Review

Our HACCP review takes place annually unless a major change in our systems or processes takes place. The review consists of looking at the HACCP plan and evaluating if there have been any discrepancies, non-conformances or major changes to the processes. If no issues are found with reviewed areas, activities carry on as normal. If it occurs that an issue has been raised, the plan will be reviewed and changes implemented for improvement.

Cambridge Commodities has no identified critical control points at this time. Further information regarding our HACCP systems and processes can be requested from our quality assurance team.

## Business continuity policy

Should a catastrophic event occur at Cambridge Commodities headquarters in the form of major fire, flood or other event that results in the total destruction of Cambridge Commodities head office and associated warehouse, the following issues would result causing disruption to supply of goods to our customers:

### 1. Loss of computer databases and systems

Cambridge Commodities virtual servers are replicated to a Disaster Recovery (DR) site throughout each day. In event of losing the main building the systems would be started at the remote site. The replicated data to the DR site is a mirror image of all of Cambridge Commodities internal systems and drives. This ensures that the maximum loss of data is less than one day. In this event, operations would be based elsewhere with access to all of the database and systems with minimal down time.

### 2. Loss of key personnel

Cambridge Commodities has an organisational structure in which all key personnel can be covered by another person/people within the business. This means that the loss of any one person will not stop business activity in the company. All records are held on our databases which are replicated to a DR site as per the above.

### 3. Loss of stock

A catastrophic event resulting in the loss of all stock at our head offices would cause delays in delivery times to customers. The business continuity insurance that Cambridge Commodities holds would enable the re-buying of all stock damaged by the fastest means available.

### 4. Disruption to energy

In the event of disruption to the energy supply, the battery backups will automatically start and keep the servers running. We also have UPS protection in place. This will allow all systems to run at Cambridge Commodities as normal for a period of 1.5 hours.

We have a dual source energy supply from both the national grid and our 126kw photovoltaic solar system. The use of high efficiency lighting throughout the building means that the solar system will provide approximately 50% of the annual energy usage.

# Personnel & cleanroom hygiene

All personnel are reminded of the importance of hygiene and it is expected that all personnel arrive to work clean and well kept. Hygiene information and the correct hand-washing techniques are available around the site to ensure all personnel are aware of the hygiene requirements at Cambridge Commodities. Staff cleanliness in the cleanroom areas are of the utmost importance. Hand swabbing has been performed to validate our hand-washing techniques.

All new personnel are required to complete a pre-employment health questionnaire to ensure they can work in our production areas and to check that nothing will pose a risk to the product.

In our cleanroom areas, personnel are required to wear the following:

- Overalls or overcoat
- Hair nets
- Beard snood
- Foot covers or cleanroom footwear

Prior to entering the cleanroom area, a step over system is in place. All protective clothing must be worn, and shoe covers must be on during the step-over to the clean area.

To reduce contamination further in the cleanroom areas jewellery is prohibited (wedding bands are permitted) as well as perfumes, aftershaves and make-up.

All employees must notify management immediately if suffering from any of the following illnesses:

- Sickness and/or diarrhoea
- Typhoid or Paratyphoid
- Dysentery
- Food poisoning
- Skin infections
- Heavy colds or flu
- Symptoms of Covid 19 (High temp, Cough, Loss of taste or smell).
- Any illness which could/may affect any other company policies regarding health and safety or personal hygiene

Cambridge Commodities will not knowingly allow any employee to work with products whilst suffering from any illness or infection which can/may affect the safety and quality of its materials.

## Training

All employees at Cambridge Commodities receive induction training as well as 'on-the-job' training. CC firmly believes in continuous improvement. Therefore, we ensure we keep developing our staff through training, whether that be through our tailored in-house training courses, or external courses which will bolster the knowledge and expertise of our staff.

All training is re-trained after 2 years, or as required.

### Basic training

Everyone at Cambridge Commodities receives basic food hygiene training as well as allergen awareness training. If a member of the team is deemed to have a high-risk role, for example those working in the cleanroom areas, they would be provided with Level 2, Food Hygiene training.

Part of the training is 'tool box talks' run by our HR team, covering everything from customer care through to organic product control. This is to ensure everyone at the company has a basic understanding of the roles of other departments and their role in providing support to those departments to ensure goods can be released for sale.

### Further training

To ensure we are continually improving we identify areas where further training would be beneficial to the team member and to Cambridge Commodities as a whole. Team members are encouraged to seek out further training that will be relevant to their job role and help improve processes on site as a result or further build up their knowledge base.



# Water quality & cleaning management

We test water quality on site annually to ensure compliance with food standards and EU regulations. We test changing room taps, lab taps, and wet room taps (due to them being located near the high-risk areas). The water has been tested for the following:

- Coliforms
- E. coli
- Enterococci
- Total viable count after 68 hours
- Total viable count after 44 hours

All testing has found to have almost undetectable microbial load in our water sources. Drainage in wet areas is checked for listeria.

This process is managed by our Technical Compliance Manager and microbiologist, Justine Banas.

## Cleaning

We use a dual cleaning method to ensure the removal of microbiological risk as well as allergenic risk. We use a detergent based cleaner and an alcohol based cleaner, this ensures the effective removal of contaminants and this process has been validated to prove its efficiency.

## Cleaning validation

Our cleaning validation includes the cleaning that the cleanroom operators carry out at their workstation before and after carrying out repacks in the cleanroom. The contaminants considered are microbial (TVC and Y&M) and allergenic and chemical in nature. Products selected are caffeine, milk protein and gluten materials.

### The purpose of the validation:

Confirmation that the operators can effectively clean all contamination (whether visible or not) from their workstation, to prevent cross contamination in terms of:

- Microbial contamination
- Product contamination

Further validation was performed for utensils washed in the dishwasher located in the wet room. The results showed effective removal of the above contaminants using the cleaning procedures as defined in the repacking/packing procedure.

# Air quality

Cambridge Commodities perform validation and verification of the air quality in all high risk areas. This includes our cleanroom areas as well as our modular cleanroom situated in our warehouse.

We use a **laminar air flow** system which forces the air in the room to the ground to ensure product dust cannot form dust clouds or contaminate the products.

The facility is constructed from composite panels (walls and ceilings) the floor is covered hardwearing and non-slip. There are air handling units (AHU) serving the cleanroom which provide heating and cooling with **HEPA filters** to provide particulate control and cleanliness. Each AHU serves six ceiling mounted air supply grilles in the packing cleanroom, and two in the Repack room. Extract grilles are low level wall mounted in both cleanrooms.

During validation of the air quality, the contaminants considered are microbial (TVC and Y&M) and allergenic and chemical in nature. Products selected are caffeine, milk protein and gluten materials.

Particulates in the air were tested for to check the effectiveness of our extraction methods. The following was observed:

- Airborne particulates meet the requirements for ISO 8 at rest.
- Air change rate of at least ten per hour.
- Microbial bioload of max 50cfu/4hrs.
- Airflow Visualization shows effective air movement, no areas of stagnation.
- Recovery to the particulate requirements is timely.

The results show that the of tests were carried out while the rooms were in operation, and they reflect the fact that the operations specifically in the repack room generate particulates and confirms that they meet the requirements ISO Class 8 cleanrooms.

# Wood, glass & hard plastic policies

Foreign body hazards represent one of the most significant risks associated with the production and distribution of food products. Among these, glass, wood and hard plastic are the most significant due to their widespread use in food production areas. It is the responsibility of a food producer or distributor to eliminate or reduce as much as is practically possible the likely occurrence of foreign body material in food products.

Cambridge Commodities has the following control system in place:

- Glass and hard plastic policy
- Glass and hard plastic control and breakage procedure
- New equipment assessment and risk reduction
- Glass and hard plastic register
- Glass and hard plastic internal audit

The prevention of foreign bodies is extremely important to Cambridge Commodities and those supplying us. During our approval process we check that our suppliers either have sieves on the line or metal detection to reduce the risk of foreign body contamination. We further ask for evidence of wood, glass and hard plastics policies during approval and audits. This provides assurances that our manufacturers have processes in place to prevent foreign body contamination at their site.

At our site, we do not allow glass or wood to enter our cleanrooms areas. In place of wooden pallets entering this area, we use easy-to-clean plastic pallets. To prevent and/or detect foreign body contamination, a manager (or their delegate) will complete a weekly glass register to check that glass or hard plastics on site have not become damaged or broken.

All glass and hard plastics have been indicated on a map. This allows personnel carrying out the register to know the exact locations to check for broken material.

If a breakage of any sort is discovered during a weekly check, a non-conformance form with corrective and preventative actions must be completed and actions implemented. Once completed, the non-conformance report can be closed.

All broken glass should be disposed of in a safe manner to ensure the safety of Cambridge Commodities staff and personnel.

# Pest control

CC use pest control contractor ProKill which provide the following services:

Routine inspections and treatments:	12 per annum
Technical/biologist visits:	4 per annum
Fly count analysis:	4 per annum
Glue board service:	4 per annum
Annual fly control unit re-tube:	1 per annum
Annual reviews:	1 per annum
Emergency callouts:	Unlimited

A bait plan has been made and a detailed site drawing identifying where each trap is set is available.

Documents can be reviewed on-site.

## Pest control management

Our pest control is managed by our Facilities Officer who is responsible for keeping communication with the contractor and following up any actions that may be given to us. The main responsibilities are as follows:

- Ensuring all documentation received is up-to-date and correct
- Set objectives and targets
- Conduct meetings with management regarding pest control
- Review and monitor the site for any issues
- Acting as the point of contact to customer and external bodies with regards to pest control

The Facilities Officer is responsible for maintaining the building fabric, making sure it is not damaged and correcting any other issues they may find with the site. A monthly GMP audit is conducted internally which encompasses all aspects of the business and as well as facility maintenance.

## Qualifications

ProKill is a certified full member of the British Pest Control Association (BPCA) and therefore complies with their full code of conduct.

We have two technologists visit our site, both have been award RSPH Level 2 aware in pest management.

# Environmental



## Zero waste to landfill



## Anaerobic digestion of product & kitchen waste



## Recycling programme



## Energy efficient HQ

Our vision is to be the leading supplier of nutritional products in Europe. This includes recognising our responsibility to protect the environment and committing to our environmental policies and procedures throughout the business.

We aim to comply with all current and future environmental legislation, prevent pollution, involve employees and contractors in our environmental programmes, and incorporate appropriate environmental factors into business decisions. Cambridge Commodities is committed to reducing waste as part of our environmental management scheme, and our ISO 14001 accreditation.

A 125kw solar panel system is situated on the roof of the building. The solar panels supply approximately half of our building's annual energy consumption, saving an estimated 55,370kgs of CO2 emissions annually. This equates to a saving of around 23,753 litres of petrol.

Our building uses heat recovery system for air conditioning. Heat recovery is a process of continuously preheating incoming cool supply air by warming it with the outgoing exhaust air.

This system pulls cool fresh air from outside the building in the winter and heats it up to a pre-set temperature. This is then mirrored in the summer, where warm air is pulled in and cooled down.

Some of the other ways we are minimising our impact on the environment include:

- Sending zero waste to landfill
- Anaerobically digesting product and kitchen waste
- Recycling throughout the office, cleanroom and warehouse
- Investing in a baler to ensure cardboard and packaging waste is disposed of and recycled easily

We have reduced waste by approx. 2 tonnes per month since introducing the baler.

We have invested a great deal into how we minimise and manage our waste, and continue to look for new ways to reduce our carbon footprint.

# Customer care team

Our experienced customer care team is on-hand to provide assistance with your order and any issues you may experience. The customer care team are in constant communication with all departments and in the unfortunate event of a complaint, organise material review boards.

## Contact details:

**Email:** support@cambridgecommodities.com

**Telephone:** +44(0)1353 667 258

Our customer care team aim to respond to all emails within one working day upon receipt.

We focus on answering all queries using knowledge from every aspect of the business to provide the best service and meet satisfactory closure times which are based upon the query. All the queries sent to customer care are dealt with through our ticketing system to ensure all enquires are numbered and kept up to date, leading to faster response times and resolutions. Please enquire for more details.

## Customer complaint management

All complaints are passed to our customer care team where every reasonable effort must be made to close a complaint within the shortest possible time. Our customers are updated throughout the complaint process to ensure they are aware of its status and the current findings of the investigation.

## Non-conformances

All non-conformances are logged on our system and followed up with a CAPA\* report. Containment actions are usually associated with a customer complaint or an audit non-conformance. However, materials can also be identified using other means such as through observation of a spillage, or observing operatives not following the correct company procedures.

When a non-conformance has been identified, the following actions must be taken, containment, corrective actions and preventative actions.

\*Corrective and preventative actions

## Containment

The product must be quarantined on our computerised system and moved physically if the quantity will allow.

Containing the material in a known location prevents the product being sold or allocated for sale until a final decision has been reached as to the material disposition.

## Corrective action

Corrective action may involve any of the following product disposition decisions:

- Re-work or inspection of the product to deem it acceptable for use (in which case it may be removed from quarantine)
- The product will be returned to the supplier
- The product will be discarded, and a scrap note raised

## Preventative actions

Cambridge Commodities is committed to continuous improvement. Preventive action is the consideration of how to prevent a similar non-conformance occurring again. In the unfortunate incidence that a non-conforming product arises, our customer care team are on-hand to ensure this does not reoccur.

## Complaint trending, analysis and improvement

A monthly meeting is organised with the senior management team to analyse complaints. The customer care team leader provides an in-depth analysis on quantity of complaints, type of complaints, any trending and how preventative and corrective actions have been effective.

The senior management team will then review the complaint trend report and look at further preventative actions to implement to reduce defects.

# Human rights & labour laws

Cambridge Commodities aims to ensure it is socially and environmentally responsible. Our ethical trading philosophy and our environmental policy significantly contributes to this achievement.

We will aim to trade ethically. To implement this policy, we will:

- Adhere to any Government recognised trading sanctions
- Refuse to work with any supplier, client or prospective client which we have reason to consider exploits humans, animals or the environment unfairly

## Employees

We are committed to ensuring that our employment practices and the enforcement of corporate regulations ensure the protection of the rights of all those who work for us. In many areas we aim to operate above the minimum standards required by law to ensure our employees are safe, rewarded and valued. We do not allow harsh or inhumane treatment against our employees.

We do not permit the use of forced, bonded or involuntary labour. All work will be voluntary, and all workers are free to leave Cambridge Commodities upon reasonable notice. Workers will not be required to hand over government-issued identification, passports or work permits as a condition of employment except to the extent that we need brief access to those documents in order to comply with applicable laws.

Child labour is not used under any circumstances. Employees will be hired only after they have presented legitimate proof of age which meets local age qualification laws. Legitimate work experience placements and workplace apprenticeship programs that comply with all applicable laws and regulations are supported by Cambridge Commodities.

## Customers

We are committed to demonstrating our ethical and social responsibility credentials to enable our customers to make informed choices about our offerings and services.

## Suppliers

We are committed to monitoring social standards in our supply chain, and we encourage our suppliers to operate to the same ethical standards we employ ourselves.

## Sedex

We are a registered member of Sedex, a global not-for-profit membership organisation. Sedex is home to one of the world's largest collaborative platform for buyers, suppliers and auditors to store, share and report on information quickly and easily. The platform is used by more than 40,000 members in over 150 countries to manage performance around labour rights, health & safety, the environment and business ethics.

Sedex is not a standard setting body and doesn't approve or certify our policies and standards. Instead, being a member of Sedex enables transparency in relation to ethical practices throughout our supply chain, which also means transparency for our customers in regards to their supply chain. Sedex membership is a sign of Cambridge Commodities' willingness to share information and to use this information to help manage and improve ethical standards within the supply chain.

**Our Sedex registration number is as follows: ZC202509034**

## Change history

Version	Change	Customer notification required Yes/No?
1-4	Historical versions.	N/A
5	Added full dossier of site information.	No
6	Removal of references to ESSNA.	No
7	Amended number of lead auditors on site.	No
8	Document format updated. Allergen status changed - removal of sesame and tree nuts from warehouse & cleanroom. Additional QA contact email. BCP review page added.	Yes
9	<ul style="list-style-type: none"> <li>Company contacts: Remove Ian York and replace with Simon Mortimer</li> <li>Quality contacts – add head of quality</li> <li>Page 24- Basic Training: Add "Level 2, Food Hygiene training" (currently states Level two hygiene training)</li> <li>Page 25 – Employees notifying management of illnesses: Add symptoms of Covid 19 (High temp, Cough, Loss of taste or smell).</li> <li>Page 33 – Sedex: Add " Being a member of Sedex enables transparency in relation to ethical practices throughout our supply chain, which means transparency for our customers with regards to their supply chain".</li> <li>Remove ISO 9001</li> </ul> <p>Pest control details:</p> <ul style="list-style-type: none"> <li>Routine 12 per annum</li> <li>Technical/biologists 4 per annum</li> <li>Fly count analysis 4 per annum</li> <li>Glue board service 4 per annum</li> <li>Annual fly control unit re tube 1 per annum</li> <li>Annual review</li> <li>Emergency call outs unlimited</li> </ul>	Yes
10	<ul style="list-style-type: none"> <li>Changed name from Becky Smith to Becky Ryder</li> <li>Changed BRC to BRC Food 8</li> <li>Added GMP+ to accreditations</li> <li>Updated Shannon McKenna job title</li> <li>Removed raw ingredients, our brands and partner ingredients pages</li> </ul>	

Originator Job Title	Assistant Quality Manager	Approver Job Title	Quality Manger
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x  
 17/03/2022 15:52

Shannon McKenna

  
x  
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