Wine Packing
Baseline Technical Requirements

Where there are additional requirements that must be met in order to trade with a retailer these must also be adhered to and may override the requirements of this document

Document Owner	Neil Dyas
Version	6
What has changed?	Key updated area • Added in restrictions for GMO, irradiation and potassium ferrocyanide • Additional phthalate and BPA controls and methanol limits introduced • Updated to cover product release and analysis of production • Updated certification requirement for food contact packaging suppliers

Purpose
This technical document, also referred to as the Code of Practice (COP) is designed to ensure that you are aware of and comply with the technical requirements of Matthew Clark Bibendum (MCB). It forms the basis for the onboarding technical audit. Due to the different sizes of the businesses we partner with, together with the different label types that we use, the requirements are scaled to best reflect both the size of the business that we are working with and the specific label type that we are working on. This is explained in the tiering of gold, silver and bronze relationships as detailed below.

Scope
The adherence to this BTR for product quality and food safety is a condition of supply and forms part of your supply agreement.

Supplier Agreement
I confirm that we will supply wine adhering to the requirements of this COP.

Name	
Signature	
Position	
Company	
Date	

Technical Standards	Tier level requirement and potential benefits
GOLD (G)	• Full compliance for suppliers • All clauses are applicable to the site (B, S, G). • Likely suitable for UK Supermarkets own labels and/or large volume on trade suppliers. • Setting best in class for suppliers
SILVER (S)	• Mid level compliance for suppliers • Bronze and Silver clauses apply to the site • Likely suitable for MCB label products and mid level volumes • Has strong systems in place
BRONZE (B)	• Minimal compliance for suppliers • Bronze clauses apply to the site • Likely suitable for artisan supplier branded products

Est sales per annum	**<30,000**	**30,000 - 200,000**	**>200,000**
Minimum tier required			
Retailer own label	Gold	Gold	Gold
MCB own label	Bronze	Silver	Gold
Supplier branded label	Bronze	Bronze	Silver

1 - Specifications

Level	1.0		**Specifications** *"Specifications are required for all products procured by MCB, this includes Branded, retailer own label and MCB own brand"*
B	1.01		• Basic specifications should be agreed and in place for all products purchased by MCB.
S		1.011	• Comprehensive specifications should be completed accurately and in full
B	1.02		• Artwork should always be approved by MCB before printing, printer proofs should be sent to your technical contact.

Section 2 – Supplier Approval

Level	2.0		**Technical Approval** *"All suppliers require approval before use, this forms part of our due diligence defence"*
B	2.01		• All new suppliers are required to complete a self assessment questionnaire (SAQ) before they are allowed to supply MCB.
B	2.02		• Audits maybe completed remotely, as a physical audit at site or a combination of both, this is decided on a risk basis.
B	2.03		• Non conformances are required to be closed off by the timescales agreed with the technical manager.

Level	2.1		**Ethical Requirements** "Suppliers must adhere to local and national legislation in respect of terms and conditions of employment"

B	2.11		• The following should be adopted as an absolute minimum:
			  • Prohibition on child labour
			  • Prohibition on forced labour - wage rates should be fair and reasonable within the context of the local economy
			  • A safe and healthy work environment
			  • Workers should not be unfairly discriminated against
			  • The principles of the Ethical Trading Initiative (ETI) base code (http://www.ethicaltrade.org/eti-base-code) which complies with the International Labour Organisation (ILO), must be followed.

S	2.12		• Sedex (Supplier Ethical Data Exchange) Advance, is a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains.
S	2.13		• All suppliers must register as B members on Sedex, whether they are currently supplying any of the major multiples or not
B	2.14		• The supplier must link with MCB and their customer(s) and complete the Self-Assessment Questionnaire (SAQ) and ensure that it is kept up to date and reviewed annually
G	2.15		• The supplier must have a physical audit 3 years

Level	2.2		**Environmental Requirements** "Suppliers must adhere to local and national legislation in respect of terms and conditions of employment"
S	2.21		• The supplier must have a written environmental policy, containing clearly defined objectives for improvement, which should be reviewed annually.
B	2.22		• The supplier should consider the local environment in their practices to ensure that the site operations do not have an adverse impact on any sensitive local environmental conditions.

Section 3 – Management Commitment

Level	3.0		**Senior Management Commitment** *"Your senior management team must be able to demonstrate that a food safety culture is embedded throughout the business. We expect commitment to continuous improvement for food safety and quality, as well as ensuring that the business acts with integrity, puts the customer first and does the right thing for MCB customers."*
S	3.01		• To establish that your senior management is committed and that the necessary support is available to put food-safety and quality-management systems for all our products into practice, the following must be in place:
B		3.011	• You will need to have enough trained personnel to meet MCB requirements on an ongoing basis and to meet your operational and technical commitments. • You will need to ensure sufficient factory capacity is maintained for supply of MCB products whilst meeting our specifications.
B		3.012	• All requests for information must be completed and given to the relevant MCB representative within the timescales we ask for.
S		3.013	• You must be able to demonstrate that food safety is the site's top priority and that the senior management team is leading the food safety culture of the site. • There should be a clear method for measuring the food safety culture of the site; this must be reviewed as a minimum annually.

Level	3.1		**Crisis Management and Traceability** *"Effective testing of the traceability and recall process are an essential part of the supplier's quality management system."*
B	3.11		• You must tell MCB as soon as you are aware of an incident that leads to a product recall or withdrawal and record details of all stages of the incident. You can contact MCB directly: ○ During office hours, contact your MCB technical or commercial contact. • Outside of office hours, and in an emergency only, call your MCB technical contacts.
B	3.12		• All suppliers must have a fully documented crisis management system with up-to-date site and customer contacts for dealing with incidents, including: ○ Food resilience challenges ○ Food safety, legality ○ Product withdrawals and recalls • You must tell MCB as soon as you become aware of an incident that affects MCB products. • It is a requirement of supply that, if your site is involved in any recall, you must contact your MCB technical manager to state if the recall affects products supplied to MCB or not. This must be prior to the Food Standards Agency (FSA) notification being released. • Definition: ○ A product **withdrawal** is the removal of product from depot and/or store. ○ A product **recall** also attempts to recover product from the customers who have purchased it
B	3.13		• If you need to call MCB about an incident, you must be able to give the following information: ○ Your company name, your name, address and phone number ○ A brief description of the problem ○ The brand name, SKU and full name of the product involved ○ A product description

			○ The pack size, variation and type of packaging (e.g. a single, multipack, etc.) ○ Details of the date code: best before/expiration date or production date ○ Purchase orders (PO) that the affected stock went out on. • Details of government or local authority involvement, e.g. police, FSA, Environmental Health, Trading Standards, etc.
B	3.14		• You must be able to maintain traceability from wine / grape receival through to dispatched product at all times.
S	3.15		• You must test your crisis management system annually, a MCB or a retailer product is to be used during the mock product withdrawal / recall.
G		3.151	• You must use a MCB product annually for a traceability • You must be able to demonstrate the timeline, show which members of the crisis management team were involved, your traceability audit outcome and that your MCB Technical contact was notified during the test.
G		3.152	• In line with the BRCGS, you must record all stages of any incident. This should include a documented timeline, with corrective and preventative actions and accountabilities, using root cause (or similar method) to identify the source of the incident.
S	3.16		• The traceability part of this test must include:-
S		3.161	○ Full product reconciliation of a single production batch (e.g. date code) from finished pack to MCB ownership. This must include any waste generated and/or product re-worked.
S		3.162	○ Of that product; at least 2 ingredients aligned to your raw material and TACCP risk assessment will be fully traced and reconciled, including 'where used' and mass balance.
S		3.163	○ Consideration of on-pack claims, Protected Designation of Origins (PDO) or ingredients identified as vulnerable to food fraud through your VACCP Plan (fraud vulnerability assessment).
S		3.164	○ During this exercise each stage of the raw material handling or process must be traced (4 hours is allowed for traceability) and time differences should be considered for materials sourced from other countries.
S		3.165	○ For the selected 2 ingredients (components used within the manufacture of the wine) you must be able to provide a validated supply chain map back to vineyard for grapes or to original manufacturer for oenological products.
S		3.166	○ You must be able to trace all raw materials back to source and follow food and ingredients through all stages of production, processing and distribution to a depot.
B	3.17		• The cost of a recall or a withdrawal can be significant depending on the quantities involved. Costs would be accumulated through the following activities:- <u>Removal and destruction of cost of goods</u> The cost of the goods that are needed to be recalled or withdrawn. Note that where stock is available to buy in a shop or an ontrade establishment this stock would typically be destroyed at the point of sale. <u>Administrative charge</u> This is the charge imposed by the customer on completing the recall or withdrawal. A recall or withdrawal from a UK supermarket could be in the range of £10,000 per recall or withdrawal. <u>Destruction of stock</u> This is a cost passed on from the customer where they have destroyed stock • You must have sufficient cover for these potential costs through insurance or other means

Level	3.2		Supply chain traceability

G	3.2.1		• You may be required to complete a full supply chain traceability which will require an initial traceability exercise to be completed.
			  • MCB will then pick a component of the batch and this will be traced back to the components of that batch.
			  • MCB will then pick one of these components and expect it traced back.
			  • This process will go on until the trace goes back to the vineyard, to identify a parcel of grapes. The vineyard name and location should be identified.

Level	3.3		Customer Complaints *"The effective investigation and continual improvement of processes reduces the number of unsatisfied customers."*
B	3.31		• A thorough and effective system for handling complaints is an essential part of your food safety and quality systems. It gives an essential measure of product quality and identifies opportunities for ongoing improvement.

B	3.32		• Due to the serious nature of these complaints, a full investigation must be carried out and any report issued will be supported by an evidence file and returned to MCB within 5 working days of you receiving the complaint, unless requested earlier.
			• The investigation must be completed by:
			  ○ A competent member of staff.
			  ○ Reviewed and signed off by a member of the supplier's senior team.

S	3.33		• Records of your investigations with appropriate corrective action timescales must be fully documented with trend analysis performed. • The same person will not complete the investigation and sign it off as complete. • Sites should demonstrate that they are addressing the root cause of complaints to continuously improve their site and product and where applicable demonstrate non-recurrence.
S	3.34		• The sign off is to ensure a root cause investigation has been conducted and a corrective action plan proposed before submitting to MCB.
B	3.35		• Unless there are exceptional circumstances and a justifiable reason, you must not respond directly to any enquiry relating to the safety, legality and quality of MCB brand products that has not come from within MCB. • Please contact MCB directly on matters relating to the safety, legality and quality of MCB.
G	3.36		• There must be a system in place to ensure staff are aware of the current complaint situation and of their role in preventing problems which may lead to complaints.

Level	3.4		Internal audits
S	3.41		• You must have internal audits in place to challenge MCB requirements at least annually or at their reissue.

Section 4 – Food Safety

Level	4.0		**HACCP and Food Safety** *"Focus on food safety is paramount for suppliers and a thorough and comprehensive HACCP plan is required for this."*
B	4.01		• To supply MCB you must have a HACCP (Hazard Analysis Critical Control Point) system, which is focused on identifying the critical points in a process where food-safety hazards could arise. • You must put control measures in place to prevent such hazards.
S	4.02		• The HACCP plan must be completed by a multi-disciplinary team, with appropriate wine knowledge and expertise. • Members must be suitably trained in HACCP awareness and at least one member (ideally the team leader) must have completed a recognized qualification.
B	4.03		• The system must adhere to the EC Regulation on the Hygiene of Foodstuffs (852/2004). • One of its requirements is that the food safety plan must be based on FAO/WHO Codex Alimentarius HACCP principles and considering relevant reference data from other recognized industry sources (e.g. Campden BRI HACCP guidelines) when deciding on critical limits and monitoring procedures.
B	4.04		• A hazard analysis must be performed, to identify all potential hazards. • Each hazard must be risk assessed as to its likelihood to occur and potential to cause adverse health effects. • The hazard analysis and risk assessment must be documented.
S			• Where it is determined that a potential hazard is suitably controlled through either a Pre-requisite Programs (PRP's) or an Operational Pre-requisite Program (oPRP), there must be suitable evidence to support this decision.
S	4.05		• The HACCP plan must be reviewed at a pre-determined frequency (minimum annually) or prior to any changes to the product or process (i.e. as part of product and process development procedures), in order to identify any changes which may affect product safety.
B	4.06		• You must control and monitor critical control points (CCP) at all times.
B		4.061	• You must be able to demonstrate that the principles of HACCP have been used. • Principles of HACCP:- o Conduct a hazard analysis and prepare a flow diagram. o Determine the Critical Control Points (CCP) o Demonstrate that a decision tree has been used o Establish critical limits o Establish a system to monitor control of the CCP o Establish corrective action when the CCP is out of control • Establish procedures for verification to confirm the HACCP system is working correctly.
B		4.062	• Hazards assessed as a CCP should have the following:- o Critical limit – verified as a minimum annually o CCP's should be verified again immediately after any engineering work that could impact the effectiveness of the critical limit.
G	4.07		• CCP procedure present where the recording of the control is completed.
S		4.071	• The Pre requisite Programs should be:- o Checked a minimum of once a year o Be reassessed if there are significant issues
S	4.08		• The following areas as a minimum must be considered as part of the HACCP system:- o Glass Breakage o Foreign bodies including risk of hair and jewelry

			○ Final Filter ○ Heavy metal, Ochratoxin A and pesticides ○ Pthalates ○ Bisphenol A
S	4.09		• All personnel must be checked for competency in CCPs.
G	4.10		• The competency of CCP completion must be documented and reviewed yearly. • Competency must be checked against a specific procedure and issue date/revision number.
B		4.10.1	• Any imminent food safety risks at site or with raw materials that could potentially impact MCB product shall be communicated to your MCB Technical contact immediately, this could include pathogen results both environmental and product, withdrawals/recalls, pest issues, raw material contamination and undeclared allergens etc.

Level	4.1		**Management of Allergens** *"Allergens represent a significant risk to the consumer and the correct control is critical."*
B	4.11		• Certain foods and ingredients can cause serious allergies or intolerances in some people; these can pose a danger to health and can be potentially fatal if consumed. • In line with legal requirements, you must make information on the presence of these major serious allergens (MSA) available on your products so that customers, particularly those suffering from a food allergy or intolerance, can make informed and safe choices.
B	4.12		• In line with MCB policy, where allergens have been used as part of the wine processing (e.g. egg and milk as fining agents), these must be declared on the label. • Where you have sufficient evidence from a validated test method that the level of casein or albumin in the product is less than the GB limit of 0.25mg/l you can ask MCB to remove the mention of egg/milk from the label.
B	4.13		• You must have an active allergen management system, the purpose of which is to reduce the risk of allergen contamination of products and to ensure adherence to legal labeling requirements where allergens other than SO2 are used.
S	4.14		• Where allergens other than SO2 are used, a site risk assessment must be completed to identify ingredients that pose an allergenic risk and you must ensure that you have control plans in place. • This risk assessment plan must be available for MCB to inspect upon request.
S	4.15		• You are required to hold on file the allergenic components of any raw material or processing aid that are used.
S	4.16		• All equipment used for allergen handling must be fit for the purpose intended and appropriately colour coded to distinguish between other equipment not designated for allergen handling.
S	4.17		• You must understand what allergens your suppliers have at their site.
G	4.18		• If other allergens are handled that you are not using, you must understand what processes they have in place to prevent cross contamination.

Level	4.2		**Foreign Body Control** *"Foreign body complaints are both dangerous and preventable; a robust foreign body prevention system is required and should look to be proactive in reducing the risk of foreign bodies."*
B	4.21		• You must have an effective program in place to prevent foreign bodies from entering the product.
B	4.22		• All areas of the factory must be maintained and be in a condition which will prevent the risk of product contamination.
B	4.23		• You must notify MCB if there is building or other work taking place that will affect MCB production or where the safety of our products may be compromised.
S	4.24		• For controls, you must have a detailed procedure that documents the frequency and capability of the tests, a reliable process to handle rejected material and actions to cascade if the system fails. • All rejects from your foreign body detection systems will be evaluated using root cause analysis techniques.
S	4.25		• You must ensure that pipes are capped and/or off the floor when not in use.
S	4.26		• Pin boards are not permitted in bottling areas.
B	4.27		• A specific procedure must be in place for the removal and disposal of at-risk products in the vicinity of the breakage; this may be specific for different equipment or areas of the production line.
S	4.28		• There must be a documented cleaning process for the line or equipment that may have been contaminated by fragments of the container. • Cleaning must not result in the further dispersal of fragments.
S	4.29		• There must be a documented inspection of production equipment following the cleaning of a breakage to ensure cleaning has effectively removed any risk of further contamination.
G	4.30		• You must ensure that authorization and sign off is given for production to re-start following cleaning.
S	4.31		• Where a final filter is used prior to bottling, there must be systems in place to ensure that the filter maintains integrity and doesn't allow yeast / foreign bodies into the product.
B	4.32		• Where packaging (e.g. bottles) is rinsed to remove foreign bodies, verification of the rinser effectiveness must be completed at a minimum annually on each bottle size.
S	4.33		• You must have a detailed procedure that includes the frequency of rinser testing, how rejected material is handled and actions to take if a system fails.
S	4.34		• Rinser water / air must be appropriately treated / filtered to prevent contamination of bottles.

Level	4.4		**Glass Controls - Glass packaging** *"Suppliers must ensure glass batches per product run are reduced to a minimum."*
S	4.41		• Suppliers using glass packaging must work with their glass suppliers to operate packaging on FIFO (first in, first out) stock rotation.
S	4.42		• MCB suppliers should ensure all like for like lot numbers are used up before introducing a new lot number to the production line.
B	4.43		• Times of the pallet numbers used must be recorded for traceability purposes and form part of the traceability and mock recall tests performed for MCB. • These must be available to review on request.
B	4.44		• For products that are held under pressure there must be sufficient evidence to show that they employ a suitable bottle that is able to safely transfer the product from the producer to the consumers' home without a loss of bottle integrity.

Level	4.5		**Pest Control** *"Effective pest control prevents the spread of disease into the factory and contamination of wine."*
S	4.51		• You must have an effective program in place for managing pests. • This must cover all areas of the site to reduce infestation by pests as far as possible. • Pest control includes the whole manufacturing site and all areas that are involved in making or storing of wine.
G	4.52		• If you employ an external contractor, they must be a member of the British Pest Control Association (BPCA) or an equivalent accredited local or national organisation.
B	4.53		• You must report any pest infestation immediately to your MCB technical contact if there is a risk to MCB technical products.
B	4.54		• You must inform your MCB technical contact in writing about any ongoing pest activity that has not been dealt with within eight weeks (assuming there is no risk to food safety). • This communication must be with us no later than 5 working days after the 8-week period. • You will need a plan in place showing the action to be taken and the timescales.
G	4.55		• Issues that are highlighted by your pest controller should be raised as non-conformances and an appropriate corrective action taken.
S	4.56		• All doors should have appropriate edging to prevent the ingress of pests. • A gap of more than 1cm will easily allow pests to enter the facility.
G	4.57		• Pest reports must give actual numbers in specific defined areas.

Level	4.6		**Wine Residues** *"The level of heavy metal, Ochratoxin A and pesticides in wine has a legal limit and steps should be in place to adhere to this."*
B	4.61		• The law has set maximum residue levels of pesticides, heavy metals and Ochratoxin A (collectively known as residues) in wine which MCB requires all suppliers to adhere to. • MCB must be informed immediately if the results of any residue testing on a product do not meet the legal requirements or where any such results pose a risk to human health. • Testing for pesticide residues must be performed using methods of analysis accredited to ISO 17025 (any use of non-accredited methods must be justified). • Where in MCB's opinion, your supporting evidence is not sustainable, or does not give a complete understanding of source and raw material risk, annual testing will be required for MCB brand products.
B	4.62		• MCB may test wine for residues due to our risk assessment that is reviewed every 3 months.
B	4.63		• You must manage the risk of residue levels in wine to ensure that all wine purchased by MCB conforms to specification including legal requirements.
S	4.64		• The control of this hazard should be demonstrable to ensure that product is legal.
S	4.65		• You must have a residue testing plan that is based on a risk assessment.

Section 5 – Supplier and Material Approval

Level	5.0		Raw Material Requirements and Supplier Approval *"There must be sufficient processes in place to ensure that only approved suppliers are used together with compliance with raw material requirements from* MCB*."*
B	5.01		• All raw materials used in the making or treatment of wine must be of oenological grade.
B	5.02		• Additives and treatments must be approved by the OIV (International Organisation of Vine and Wine) and must be within OIV recommended limits and GB and EU legal limits.
S	5.03		• There must be a robust process in place to ensure that the suppliers you use, are selected on the basis of a range of competencies.
G		5.031	○ Suppliers must be routinely reviewed to ensure that they are supplying conforming product and that they are providing food safe and quality products.
G		5.032	○ Supplier risk assessment / evaluation will be used and should considers key areas such as rejections, accreditations supplier performance.
B	5.04		• Water used for washing wine handling equipment must be maintained free from pathogens, including protozoans, or contamination which may affect product quality.
B		5.041	○ You must make sure that you use suitable water treatment and processes and that the water is free from taint.
S		5.042	○ Water filters should be checked to confirm that they are working correctly at a risk based interval.
B		5.043	○ You must have a suitable water treatment process or use a source recognised as safe.
G		5.044	○ Water used in the rinser should be filtered through a 0.2 micron filter. The Company's preference is for the water to drain away. ○ If water is re-circulated, it should go back through the 0.2 micron filter. ○ Where a filter is not used, this should be justified by a risk assessment
	5.05		• Where gases are used during wine manufacture or bottling they should comply to the following requirements:
B		5.051	○ When they are delivered they should have a certificate declaring that they are food grade.
S		5.052	○ When manufactured on site, routine purity testing must be undertaken to confirm it meets specifications.
S		5.053	○ Based on risk assessment, the microbiological and chemical quality of water, steam, ice, air, compressed air or other gases that does not constitute an ingredient but comes in direct contact with product, must be regularly monitored and controlled.
G		5.054	○ Gases should be included in traceability exercises to ensure that lot codes can be isolated.
G	5.06		• Genetically modified organisms (GMO) should not be used at any point within the process of making wine either from additives such as yeast or through grapes
G	5.07		• There should be no irradiated components used within the wine making or bottling process.
B	5.08		• The use of potassium ferrocyanide is prohibited without express permission of the MCB technical team.
G	5.09		• Supplier of packaging that is food contact must be certified against a packaging GFSI standard.

Level	5.1		**New Product Development** *"Development of new products and use of new materials should be controlled to prevent additional unconsidered risks entering the process."*
G	5.11		• You must have a system in place for developing new products and keep records to prove that all products have been developed in line with the system.
G	5.12		• You must have a documented system for product design and development that includes a hazard analysis study when developing new products and reformulating products to ensure that you can prove that they have been adequately assessed for safety, quality and legality.
S	5.13		• The documented process should also risk assess any new oenological products used to ensure that they do not introduce additional risks.
G	5.14		• You must carry out documented trials on factory-commissioned equipment.
S	5.15		• Where new packaging is developed, you must be able to demonstrate through trials and/or from the manufacturer that the product is fit for purpose.
S	5.16		• Each product that is developed should be signed by the technical/quality function to confirm that the site HACCP plan has been reviewed for this product.
B	5.17		• All artwork must be approved by the MCB team before being printed. If you fail to do this then you will be responsible for the cost of the artwork if it is not subsequently approved by MCB prior to printing.

Level	5.2		**Food Fraud Prevention Strategy** *"Product vulnerability and food fraud are a risk to our business, product authenticity must be considered."*

B	5.21		• You must have a document fraud assessment that considers the risk of fraud in:-
			  • Wine
			  • Oenological additives
			  • Packaging materials

B	5.22		• If there is any concern of adulteration of product, you must contact MCB immediately.
G	5.23		• You must be able to show with full documentation transparency of your supply chain back to vineyard, when requested.
S	5.24		• Throughout the approval process, you must provide absolute clarity and a documented supply chain on where products are manufactured and packaged. • This must take into consideration any co-manufacturing, co-packing, transport, traded goods/bright pack and storage including any that are established for contingency or peak supply periods.
S	5.25		• Where the full supply chain cannot be traced, you must risk assess the gaps, put in place appropriate control measures and make this information available to MCB if requested.

Level	5.3		Vegan Labelling
B	5.31		• For a supplier label to be labeled as vegan, you must ensure that the below substances have not been used in the manufacturing of the wine:- ○ Blood and bone marrow ○ Casein (milk protein) ○ Chitin (fiber from crustacean shells) ○ Egg albumen (derived from egg whites) ○ Fish oil ○ Gelatin (protein from boiling animal parts) ○ Isinglass (gelatin from fish bladder membranes) ○ K-Caseinate • For a wine to be labelled as vegan there must have been no animal testing conducted on the wine at the initiative of the supplier or on its behalf.
S	5.32		• For a wine to be labelled as vegan the supplier must be able to demonstrate a validated process to avoid cross contamination with non-vegan products. • The supplier must ensure that tanks / filters and other processing equipment are washed between being used on vegan and non-vegan wines to as far as possible reduce the risk of cross contamination.
G	5.33		• External validation of the vegan claim maybe required, in the UK the vegan society are able to validate a wine as vegan and subsequently authorize it.

Level	5.4		Vegetarian Labelling
B	5.41		• To label wine as vegetarian you need to fulfill the requirements below and gain MCB approval prior to labelling. • When declaring that the wine can be labelled vegetarian, you as the supplier confirm that the wine meets this standard. • The development and manufacture of the Wine must include no animal ingredients (including by-products & derivatives). • None of the following must have been included in or used in the production of the wine:- ○ Blood and bone marrow ○ Chitin (fiber from crustacean shells) ○ Fish oil ○ Gelatin (protein from boiling animal parts) ○ Isinglass (gelatin from fish bladder membranes). • For the wine to be labelled as vegetarian, there must have been no animal testing conducted at the initiative of the supplier or on its behalf.
S	5.42		• For a wine to be labelled as vegetarian the supplier must be able to demonstrate a rigorous process to avoid cross contamination with non- vegetarian products. • The supplier must ensure that tanks / filters and other processing equipment are washed between being used on vegetarian and non- vegetarian wines to as far as possible reduce the risk of cross contamination.
G	5.43		• External validation of the vegetarian claim may be required, in the UK the vegetarian society are able to validate a wine as vegetarian and subsequently authorize it.

Level	5.5		**Organic Wine** *"All wine sold as organic must come from growers, processors and importers who are registered with an approved certification body and regularly inspected."*
B	5.51		• Organic products must be produced in line with UK organic regulations. • You must provide a current organic certificate from an approved organic certification body. • Products that you supply must be specifically identified within the scope of the certificate or on the attached schedule. • You must hold both the certificate and schedule for certification to be considered valid. • You must take reasonable precautions based on risk to ensure that any ingredients that you purchase and which you intend to be marketed as organic have the appropriate controls in place to validate these claims. • If you process non-organic products for other customers, you must have adequate segregation in place between organic and non-organic materials and process. • If you are planning to supply organic products, please speak to your technical contact to ensure that you are following UK organic requirements.

Section 6 – Control of Operations

Level	6.0		**Packaging Control** *"Incorrect packaging being used is a key preventable issue that should be addressed through adequate controls."*
S	6.01		• There must be a procedure for the intake of printed packaging and labels.
S	6.02		• There must be a procedure for the storage of packaging and labels and it must minimise the risk of incorrect labels being used (e.g. segregation of like-for-like labels and labels containing allergens).
S	6.03		• There must be a procedure for the issue of packaging and labels to the line must be managed by trained and competent personnel.
S	6.04		• All packaging must be documented at the start/end of any reel changes, breakdowns and at any subsequent checks in-between.
G	6.05		• There must be a procedure for the control of returned, part-used packaging from the line.
S	6.06		• There must be a procedure for work-in-progress and off line printing to ensure batch control.
G	6.07		• You must be able to demonstrate full mass balance of packaging used.
S	6.08		• Where fully automated or partially automated systems are used for packaging checks there must be sufficient controls in place at setup and manual intervention points to ensure that the right controls are in place. There must be a monitoring procedure in place in line with the manufacturer's guidance and there must be protocols in place in case the system is faulty or is not in use.
G	6.09		• After each production run, it should be demonstrable that the line has been cleared of previous product through a documented procedure and sign off.
B	6.10		• Part-used packaging must be returned to storage and sealed to protect packaging from contamination after use.
B	6.11		• Procedures must be in place for ensuring correct lot code is applied to packs and bottles
B	6.12		• You must ensure adequate control of work in progress and off line printing to ensure batch control.

Level	6.1		**Concessions**
B	6.11		• It is your responsibility to make sure the supplied product accurately meets the product specification and the requirements of all relevant MCB policies. • All concessions must be agreed in writing on the relevant MCB documentation with your MCB technical contact prior to any changes being made. • Concessions will not be issued for greater than a 12 month period. • Failure to resolve the concession by the agreed deadline may result in product being removed from shelf or supply ceasing until the concession is resolved.
B	6.12		Permanent Changes • Where a permanent change or derogation is required to product or stated process then this must be formally agreed with your MCB Technical Manager.

Level	6.2		**Compliance to Specifications and Non-Conforming Products** *"Complying with agreed specifications and controlling non-conformances at source ensures that the consumer receives a consistent product that is free from defects."*
B	6.21		• MCB will purchase products from a retailer/outlet and test them to ensure that they meet the agreed specifications. • The sampling frequency is based on risk and complaint numbers that are reviewed quarterly.
B	6.22		• If a sample is out of specification, a non-conformance will be raised with an appropriate corrective action required. • This could result in a withdrawal or recall of the relevant product or products, especially if the parameter is a legal requirement.
B	6.23		• Any product that is unsuitable for human consumption must not enter the supply chain. • The product must be disposed of in a safe and legal manner with documented evidence to support the disposal.
B	6.24		• To ensure the integrity of the MCB is not compromised, you must not sell Bibendum branded products to any other outlet without explicit written permission from MCB and we will normally require de-Branding under our control or to our satisfaction.
B	6.25		• Product must not be able to be released before both chemical and microbiological testing has been completed, product should only be released once it is confirmed that it is in specification.
B	6.26		• Systems must be in place to prevent any accidental release of out of specification product.
B	6.27		• Accurately agreed specifications must be in place for all launched products.
B	6.28		• You must ensure that all finished product meets specification from the first package produced through to the last product produced, you must be able to provide evidence that is the case

Level	6.3		**Winery Operational Standards** *"Ensuring the facility is fit for purpose and well maintained prevents issues from developing."*
B	6.31		• Walls, floors, ceilings, drains and doors must be designed and maintained to allow effective cleaning. They must be maintained in a good condition to prevent foreign body risks.
B	6.32		• Doors must prevent pest ingress into the facility.
S	6.33		• Windows should be maintained and not present a foreign body risk.
S	6.34		• Windows should be appropriately screened to prevent the ingress of insects or rodents.
G	6.35		• Drains must be accessible for cleaning and fitted with screens or traps to prevent pest entry, odours and debris from blocked drains.
S	6.36		• Lights must be protected by shatter proof covers and or sleeves (on the light tubes/bulbs).
B	6.37		• Storage areas must be fit for purpose and maintained in a clean/hygienic condition.
G	6.38		• Toilets must be segregated from production and storage areas by a minimum of 2 doors with an intervening ventilated space.
B	6.39		• The supplier must ensure that grape reception areas are clean, tidy and well maintained. ○ At the end of processing, the supplier must wash down the entire area. ○ The supplier must regularly clean all presses throughout the vintage period. ○ Any equipment not constantly in use should be cleaned and covered up between uses.

Level	6.4		**Chemical Control** *"Correct controls on the use and monitoring of chemicals significantly reduces risk of product contamination."*
S	6.41		• Chemicals used within the production facility must be food safe and must be controlled to restrict access to trained individuals.
S	6.42		• Before wine comes into contact with tanks, filters, fillers etc. there should be documented proof that the previously used chemical has been removed e.g. through the appropriate use of pH test strips.

Level	6.5		**Cleaning** *"Effective cleaning of lines prevents off taints and possible re-fermentation of the product."*
S	6.51		• All areas of a factory must be on a master cleaning schedule.
G	6.52		• Cleaning of all areas in the factory must be based on a schedule, which is also based on contamination risk to product and the level of mould present (potential Haloanisole taint risk).
S	6.53		• Where temperature is an integral part of the cleaning process this must be both initially validated and verified annually to confirm that the appropriate temperature is reached.
B	6.54		• Chemicals containing chlorine must NOT be used in the factory.
S	6.55		• All equipment used for cleaning should be fit for the purpose intended and appropriately colour coded to distinguish between uses i.e. glass and non-glass cleaning.
S	6.56		• Hand washing or sanitizing must be completed on entry to food handling areas and after the following (this is not an exhaustive list):- ○ Eating ○ Smoking ○ Using the toilet
G	6.57		• A cleaning matrix must be used to prevent cross contamination between wines, including:- ○ Moving from one colour of wine to another. ○ Moving from a non vegan wine to a vegan wine. ○ Moving from high sugar to low sugar wine.
S	6.58		• Sterilization/Disinfection should be completed on a risk basis, it should ensure that product produced is free from microbial contamination and subsequent faults.
G	6.59		• Cleaning/Sterilization/Disinfection must be validated to confirm its effectives to remove both microbial growth as well as wine residues left in tanks, pipes, filters or fillers.
S	6.60		• Hygienic condition of any vehicle used to load finished products is confirmed by documented inspection at intake and prior to dispatch.

Level	6.6		**Records**
B	6.61		• You must make any relevant product records available to us on request.
B	6.62		• You must retain MCB product records from the date of packing the wine for 6 years. In the event of a legal challenge in relation to your products, you will ensure the records associated will be kept until case resolution.

Level	6.7		**Volume Control** *"Consistent and accurate filling of packaging is both a legal requirement and prevents deception to the consumer."*
B	6.71		• The system used to ensure that you are filling to the UK/EU requirements when bottling, must be one of the following:- ○ Minimum fill ○ Average Fill
B	6.72		• Fill control records must be representative of an entire run and as such, you must sample enough bottles to confidently show this.
B	6.73		• You must be confident that the equipment used for fill control checks is accurate and the volume of the product meets legal requirements for the entire run.
S	6.74		• Where scales/balance are used, these must be calibrated daily with a verified weight that can be traced back to national standards.
S	6.75		• You must ensure that there is a procedure to manage low fills and to prevent then reaching the final customer.
S	6.76		• Bottles filled that are under a TNE2, Tolerable Negative Error (T2) must be rejected.
G	6.77		• Where the bottle rejection is automatic, the rejection system shall be verified as set up correctly daily or after a size change.
G	6.78		• Where this check is manual, appropriate training must be given and documented to relevant employees.

Level	**6.8**		**Maintenance of Equipment** *"Correct maintenance of machinery and the appropriate safe guides are required to ensure the ability of the supplier to meet the demands of MCB and prevent contamination."*
S	6.81		• A program of planned, preventative maintenance must be carried out on all food safety critical equipment and services. • Schedules must be set in accordance with manufacturer's recommendations, equipment risk and history. • Stocks of critical machine parts must be maintained.
G	6.82		• Engineering activities must be suitably controlled. • Risk assessments must be completed prior to work commencing to ensure product and packaging is not put at risk. • High risk engineering work (drilling, grinding, welding, cutting etc,) must not take place on equipment being used for production or on any equipment immediately adjacent, unless suitable hygienic screening is in place.
G	6.83		• After high risk engineering work has been completed, a documented system must be in place to assess and sign off hygiene standards by the engineer and a secondary person, prior to the use of that equipment in production.

Level	6.9		**Food Defense** *"Sites need to have a clear process for prevention of deliberate contamination of product whilst at your site."*
B	6.91		• There should be a documented assessment that considers potential risk of deliberate contamination of product when at your site. • You should detail what measures you have in place to prevent this from occurring. • This should be reviewed at a defined frequency

Section 7 – Wine Quality

Level	7.0		**Wine quality and laboratory testing** *"The production of quality wine is key and suitable precautions should be in place to prevent poor quality wine being shipped to* MCB*."*
B	7.01		• You must manage the risk of haloanisoles ("cork taint") within your operation. You must be able to demonstrate what steps you have taken to prevent the formation of haloanisoles within your winery.
B	7.02		• Inert gas cover should be used to prevent oxidation during treatments and transfers.
B	7.03		• Prevention of tartrate crystal formation is required.
B		7.031	○ The presence of tartrates in wine has been shown to cause a significant increase in consumer complaints.
B		7.032	○ Our preference for tartrate stability is to stablise through tank chilling with potassium bitartrate seeding, however where metatartaric acid, or no preventative method is used, this must be agreed with your MCB commercial representative prior to use due to the limited timespan that these methods are effective. ○ Where CMC or Polyaspartate is used, you must be able to demonstrate that it provides tartrate stability for the shelf life of the product through comprehensive trialing.
B		7.033	○ If you wish to use CMC then it must be of Oenological grade meeting the following specification of molecular weight range from 17,000 to 300,000 Daltons, with a degree of substitution between 0.60 and 0.95.
B	7.04		• White wine must be protein stable; cloudiness in wine has been shown to cause a significant increase in consumer complaints.
B	7.05		• Where the wine has not been protein stabilized this must be agreed with your MCB commercial representative prior to shipping or bottling the product.
B	7.06		• All wine must be stable for its shelf life.
B	7.07		• Any equipment that requires calibration to ensure the accuracy of the result must have a defined calibration schedule.
G	7.08		• Laboratory equipment must have a daily verification check to ensure results are accurate.
G	7.09		• Where chemical solutions are used, they should be verified that they are made to the correct strength.
S	7.10		• The use of an external ring test at a minimum of yearly should be completed to verify that internal laboratory results are accurate.
S	7.11		• Where a Z-Score is given for ring tests, a corrective action shall be required where they are greater than 3.
B	7.12		• You must ensure that a minimum of 2 samples are taken per production run, as these may be used for complaint investigation or for sensory evaluation by MCB.
B	7.13		• For the first production of an MCB product 6 bottles must be kept for reference, 1 bottle must be sent to the reagents park road office for inspection.

B	7.14		• You must be confident that the wine doesn't breach legal methanol limits, though production of methanol through the fermentation process.
	7.15		• If you are canning wine please follow guidelines in Appendix

Level	7.2		**Provenance and Legal Labelling** *"Misleading consumers through inaccurate labeling is a breach of your supply agreement with* MCB *and may be a criminal offence. Sufficient checks must be in place to prevent this occurring."*

B	7.21		• Many wines that MCB source have specific quality attributes and regional restrictions associated with them, including:
			  ○ % varietal blend
			  ○ Minimum/maximum alcohol by volume (ABV)
			• Restrictions on vinification practices used

B	7.22		• MCB expects you to ensure that you maintain full compliance with these standards and the associated practices of the relevant regional bodies that enforce this (e.g. AOC, DO, DOCG, etc).
B	7.23		• Any of these areas of compliance can be challenged during audits or traceability studies and evidence will be required to confirm that you meet the specific requirement of the regional body.
G	7.24		• Where you make claims on MCB packaging you must ensure that this has been approved with MCB and that you have the relevant validation and ongoing monitoring to ensure that the claim is substantiated and legal throughout the entire duration of the claims use. • This includes all claims on the pack, such as provenance, allergen, vegan and vegetarian. • For all claims, suppliers must have the appropriate controls and segregation in place to ensure that other products being manufactured at the same site do not impact the validity of other product's on-pack claims. • This should consider; risk assessment, cross contamination, appropriate segregation and, where appropriate, testing to maintain claim substantiation (e.g. vegan products being produced in a non-vegan dedicated site). These shall be documented, verified and available upon request to demonstrate compliance.

B	7.25		**Keg labelling**
			• If supplying kegged wine each keg must be labelled to ensure correct traceability of product, this label should be attached to the keg and contain the following information: -
			  ○ Importer
			  ○ Product name
			  ○ Vintage
			  ○ Quantity in keg
			  ○ Alcohol
			  ○ Packed date
			  ○ Country of origin
			  ○ Allergen information

Level	7.3		**No/Low Alcohol Products** *"Beverages that are not wine and are no or low alcohol have specific regulations that the supplier needs to be aware of."*
B	7.31		Beverages with a maximum ABV of 1.2% must primarily be labelled in accordance with the Food Information to Consumers Regulation (EU 1169/2011).
B	7.32		• Low and no alcohol beverages are not legally defined by law, nor do they have accepted self-explanatory names. • Therefore, the name used must be a descriptive name that informs consumers what the product is.
B	7.33		• Products with a maximum alcohol content of 1.2% are subject to the full labelling requirements of EU Regulation 1169/2011 and must therefore include the following:- ○ The name of the food ○ An ingredients list ○ An indication of allergens present in the final product ○ Quantitative ingredient declaration (QUID) ○ Nutritional information ○ Durability indication ○ Nominal volume ○ The name and address of the food business operator ○ Storage instructions (if appropriate) ○ Instructions for use (if appropriate) ○ Origin marking (if the label would be misleading without it)

Level	7.4		**Bulk Tanker Handling** *"Delivery of bulk wine requires correct handling and proper processes to ensure that its treatment is not detrimental to the final product."*
B	7.41		• Bulk wine must not be offloaded, without the correct documentation including:
B		7.411	○ Accompanying documentation showing identification of the product.
B		7.412	○ Cleaning certificate.
B		7.413	○ Full documentation relating to seals and their numbers associated to the tanker delivery. ○ Documentation clearly stating varietal and region. ○ All seals should be present.
B	7.42		• Procedures must be in place to verify that the bulk wine matches the wine requested.
B	7.43		• There must be an appropriate specification and testing for chemical and microbiological parameters for each delivery.
B	7.44		• The OIV guide on bulk containers must be followed by all components of the supply chain.

Level	7.5		**Food Contact Materials** *"Plastics and other materials have the capacity to leach chemicals into wine if they are not appropriately made."*
B	7.51		• All packaging materials should have an appropriate food contact certificate that details the successful completion of migration testing, this must be completed on a risk based basis
S	7.52		• Plastics used in the processing of wine such as pipes must also have an appropriate food contact certificate complete with migration testing states. There should be a documented renewal process to ensure that hoses are disposed of when a risk of phthalate leaching occurs.
G	7.53		• Where possible phthalates free hoses and wine handling materials should be used.
S	7.54		• Where concrete tanks are used with epoxy resin liners, there must be a maintenance plan in place to ensure that the liner is renewed at appropriate intervals to prevent phthalates leaching into the wine or non-phthalate resins are used where possible.
B	7.55		• Packaging should be certified as BPA non intentional where the risk of BPA is present

Section 8 – Packaging Standards

Level	8.0		**Closure Application** *"The correct application of corks and closures are essential both to ensure product quality and to provide tamper evidence. The closure must be able to be removed by the consumer with an acceptable level of force."*
G	8.01		• Still Wine Corks - The quality and coverage of the surface coating for natural and technical still wine corks must allow extraction with independent extraction force values between 180 and 400N (Newton) with a recommended average between 200 and 350N.
G	8.02		• Sparkling Wine Corks - The extraction with independent extraction force values must be between 180 and 350N with a rotation between 90 degrees and 900 degrees.
S	8.03		• Adhesion of the surface coating to the cork must be sufficient to prevent coating material flaking from the cork during bottling. No oily residue shall be present on the wine after using the treated closure. It should also ensure total impermeability with no signs of capillaries either along or through the cork.
G	8.04		○ Screwcaps – The force required to open a screwcap is split into the slip and break values. These should be: • Min 6.9 kgf.cm • Max 20 kgf.cm • When setting on the line specifications the effect of the liquid interaction on the thread of the bottle, on the torque value should be taken into account.

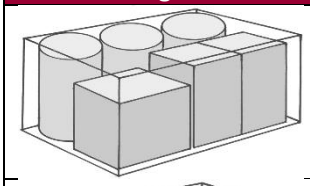
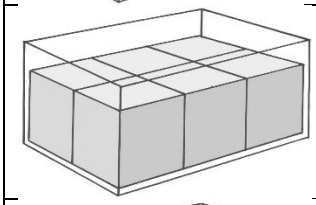
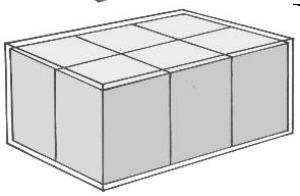
Level	8.1		**Sparkling Wine Packaging** *"Choosing and handling the bottle correctly will ensure that there is a reduced chance of bottles shattering either at the bottling line or at the consumer's home."*
B	8.11		• The bottles must be able to maintain bottle integrity when the internal temperature of the product is raised to 40°C.
B	8.12		• When the bottle is being used within the winery you must ensure that all possible steps are taken to reduce the chances of excessive impact damage and scratching during the manufacturing process. • As a minimum, you must ensure open bladed knives are not used, transfer through the machines is smooth, and guiderails are coated with plastic.
S	8.13		• The glass specification developed by the producer must state minimum glass thickness (especially side well and contact points) within a range and state tolerance.

Level	8.2		**Printed Information** *"The packages need to be easily identifiable for MCB."*
B	8.21		○ To ensure products are easily identifiable, all MCB own-label products must have the following information printed on the label or printed directly on to the box. ○ You must keep to these to make sure the label can be read from a distance of 5 meters:- ▪ Product name ▪ Gross weight ▪ Pack size ▪ Country of origin ▪ Best before end (BBE) for low or 0% products

			▪ If Organic also add ORG or Organic into the Product name

	8.3	**Packaging principles** *"Correct case design will ensure that the product reaches MCB in the desired condition."*

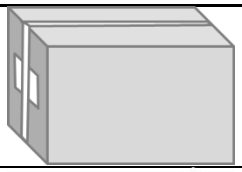
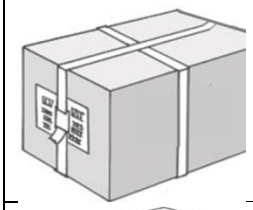
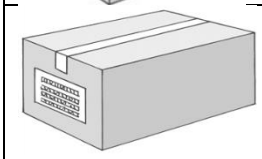
B	8.30		**Case Size & Utilization** • Cases containing more than one type of wine are prohibited. • Always ensure that the correct size of case (including the depth of the case) is used to fit the contents. In other words the case is "FIT FOR PURPOSE". • All cases and trays must be completely filled to fit their cube.

Case Packing	Acceptable
	No
	No
	Yes

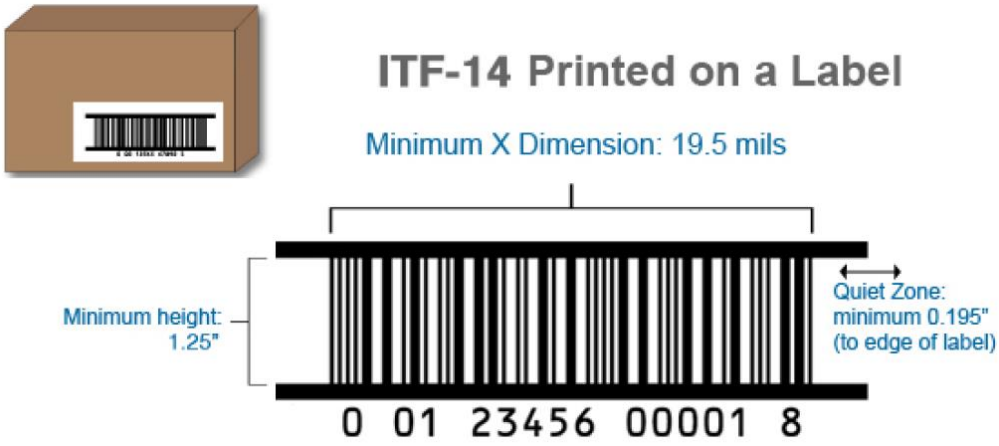
- Internal dividers must be used on fragile products that are likely to sustain damage during distribution.
- Case material and construction must make sure that the structure of the case is maintained throughout the delivery process and any onward distribution.
- In normal distribution and storage conditions, cases must be able to withstand a minimum top load of 200kg over the surface area of a 1000 x 1200mm pallet (i.e. 17g per cm^2) or the cases own weight, if greater.

B	8.31		**Case Sealing**

Case Sealing Style	Comments

					• Tape or adhesive MUST NOT become loose. • Tape MUST NOT cover the label or case printing.
					• Banding is not to be used without prior agreement with MCB. • If banding is authorised it must NOT obscure labels the product.
					• Adhesive tape or glue are the only methods to be used for securing case flaps.
			• Total case weights of up to 16kg are permissible, but it is preferred that the maximum case weight should be no more than 10kg.		

	8.4	**Barcodes** *"The correct barcode at the correct resolution will ensure the bottles and cases are scanned correctly and right first time."*

B	8.41		○ All products are receipted into depots by scanning the outer case barcode, so it is essential that all cases have clearly visible and scannable outer case barcodes on the short end of the case. ○ All product labels supplied to the company must be labelled using the UPC shipping container symbol ITF-14 which contains the following information  Digit 1: Packaging indicator Digits 2-3: UPC numbering system or EAN prefix Digits 4-8: Manufacturer identification number Digits 9-13 Item identification number Digit 14: Check digit ○ ISO/IEC 15416, and must give CEN/ANSI scanning readings of Grade A-C; except for bar codes printed on corrugated fibreboard outer cases, where Grade D is acceptable. ○ When the cases are stacked on the pallet, you must ensure that the outer case barcodes are facing outwards for ease of scanning. ○ The consumer unit barcode must not be scannable through the outer packaging. ○ We recommend that suppliers check the scan-ability of barcodes produced by the nominated printer, as the supplier is ultimately responsible for ensuring that barcodes conform. ○ To prevent reflectance problems with barcode scanning, it is important that the use of high gloss labels or substrates are avoided. ○ Suppliers should be aware that customer barcode requirements vary, but the minimum carton barcode size is 32mm height between the bearer bars. ○ Customers often require an actual product label and carton sample for scanning approval before orders are placed, and suppliers must be prepared to supply these. ○ Suppliers must under no circumstances change barcodes on approved labels without consulting the Company Technical Team first.

Level	8.5		**Legal Labelling Requirements** *"Legal labelling requirements must be met at all times"*
B	8.51		• The net quantity of the wine should be declared meeting the size requirements below

<table>
<tr>
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<td>
<table>
<tr><th>Nominal quantity in g or ml</th><th>Minimum height of figures</th></tr>
<tr><td><50</td><td>2 mm</td></tr>
<tr><td>≥50-200</td><td>3 mm</td></tr>
<tr><td>≥200-1000</td><td>4 mm</td></tr>
<tr><td>≥1000-10000</td><td>6 mm</td></tr>
</table>

The size of the below should be a x-minimum of 1.2 mm.

Volume of alcohol, the actual alcoholic strength by volume

The actual alcoholic strength by volume shall be indicated in percentage units or half units.
The figure shall be followed by the ‘% vol’ symbol and may be preceded by the words ‘actual alcoholic strength’, ‘actual alcohol’ or ‘alc’. e.g. 12% vol, 13.5% vol.

The date of minimum durability or the ‘use by’ date (optional for wine over 10% ABV)
The name or business name and address of the producer
The country of origin or place of provenance of the wine

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<td>B</td>
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Please ensure that all importer and labelling statements are agreed with your technical contact prior to printing of labels.
For non wine products please speak to your commercial or technical contact if you are unsure on what statements you need to use.

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<td>B</td>
<td>8.53</td>
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MCB’s labelling must ensure traceability of product
Labelling statements will vary depending on location of bottling.
Product that has been bottled outside of GB, then one of our importer statements is requirement on the back label.

Bibendum off trade statement - “Sourced by W1259, UK and distributed by Chalk Farm Wine, NW1 8UR, UK".
Matthew Clark on trade statement - “Sourced by W9061, UK and distributed by Chalk Farm Wine, NW1 8UR, UK".
Where a product is going into both on and off trade, please use the on trade statement for labelling.

Where the product is going into a retailer, this maybe modified based on the retailers’ requirements.

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<td>B</td>
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Where you are paying someone to contract pack the wine, a specific statement is required that covers both you as the wine owner and the contact packer.

The statement is “Bottled / Packaged for XXX should be used for bottling
In each case the location of the bottling or packaging must also be shown.
So, for example, in the case of company ABC Ltd arranging for another company to bottle their wine the expression would be:
“Bottled for ABC Ltd, address or postcode, UK (optionally “by” the name of bottler) “at” (bottler’s administrative address or their postcode UK”).

</td>
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</table>

Level	8.6	Pallets

			"The correct choice of pallets with the correct pallet stacking ensuring safe transportation of the goods."
B	8.61		○ All pallets MUST be 1000mm x 1200mm x 162mm with 4 Way Entry. ○ They preferred pallet should be of similar standard to the blue CHEP which sets a benchmark in terms of strength and construction. To be accepted other pallets tendered must be in our opinion of a comparable quality. ○ Pallets must meet the requirements of the International Standards For Phytosanitary Measures ISPM No. 15 Guidelines For Regulating Wood Packaging Material In International Trade (2002) and BS ISO 6780 ○ Incompatible pallets are:- ○ Euro Standard 800mm x 1200mm pallet ○ 4-way Yankee pallet ○ Europal pallet ○ INKA pallet
B	8.62		○ Goods delivered in unstable, sub-standard, damaged or contaminated pallets may be refused. ○ Drivers may be given the opportunity to re-stack goods on to acceptable pallets (off MCB premises), OR the Distribution Centre will re-stack the goods, to ensure compliance with health & safety. • If so, the supplier will be charged in line with the supplier recharge policy.
B	8.6.3		**Pallet Dimensions**  • Height – 162mm  Stacked pallet dimensions • Max. Height = 1.8m • Max. Weight = 1240kg • All measurements and weights MUST include the pallet. • Products must NOT overhang the pallet (this includes any pallet baseboard being used). • Cases must be able to withstand a top load of 200kg over the surface area of a 1000 x 1200mm pallet (i.e. 17g per cm^2) or its own weight if greater. • Slaved Pallets (pallet on top of another pallet) are NOT allowed. Cases MUST be delivered on a pallet that is the correct dimension and FIT FOR PURPOSE. • Excessive under-hang can cause stability issues if pallets are double stacked at distribution centre. • Layer dividers are permissible on products, where they are deemed a requirement to make the product more stable during transit and comply with the following: ○ Material: cardboard or corrugated cardboard. No tissue paper, plastic or wood. ○ Thickness: a minimum layer divider thickness is required to prevent the layer dividers being sucked between the cases. ○ Size: No bigger than the layer of stock they are on ○ Shape: flat, no hood or tray shape or large indents made by products. • No material (or spray) which increases friction (rubberized).

			• Mixed pallets - If multiple products are loaded on a single pallet, they must be split out using pallet dividers.  

B	8.6.4		**Pallet type – Kegs**
			• Type – The following heat-treated (ISPM 15) pallet types are acceptable:
			  ○ UK Standard" 1000mm x 1200mm (40" x 48") four-way entry full perimeter base, conforming to BS ISO 6780.
			  ○ The "Euro Standard" 800mm x 1200mm.
			  ○ Supplier specific1170mm x 1320mm (46"x52") 2 way "Keg pallet" only.
			• Preferred
			  ○ The preferred pallet should be of similar standard to the blue CHEP, which sets a benchmark in terms of strength and construction.
			  ○ To be accepted any other pallets tendered must be in our opinion of a comparable quality.
			• Incompatible
			  ○ The 4-way Yankee pallet will not be accepted.
			• Quality
			  ○ All pallets must be complete and of sound construction. Any defective or sub-standard pallets will be rejected.
			• Pallet exchange
			  ○ Pallets will be exchanged on a 1 for 1 basis, where empties where available.

B	8.6.5		**Pallet Configuration – Kegs** <u>Stacking</u> • Pallets must be stacked using uniform configurations, either 6 per layer (2 layers Max.) with approved dividers, on "Chep" pallets, 6 per pallet on "Chep" Euro pallets or 8 per layer on supplier specific "Keg pallets". <u>Weight</u> • The maximum weight for a pallet is 1,500 kg, including the pallet board. <u>Height</u> • The maximum height for a pallet is 2.0 metres, including the pallet board. <u>Mixed pallets</u> • If multiple products are loaded on a single pallet, they must be split out using pallet dividers.

Level	8.7		**Packaging Materials** *"Every effort should be made to ensure that all the packing materials can be recycled."*
S	8.7.1		• PVC and PVdC should not be used in MCB products, as this is not recycled in the UK.
S	8.7.2		• Mixed materials or mixed plastics that cannot easily be separated for recycling should not be used unless they are required for technical functional purposes.
S	8.7.3		• Paper and board must be from sustainable sources. • Virgin grades should preferably be FSC or PEFC accredited. • Recycled board can be used where there is no direct or intimate food contact and in line with MCB guidelines.

Appendix 1 – Key documents to be reviewed for the audit

Senior management review
1. Record keeping procedure
2. Food culture plan
3. Crises management plan

Food Fraud
1. VACCP Assessment

Traceability, withdrawing and recalling product
1. Withdrawal procedure
2. Withdrawal test
3. Traceability procedure

Customer Complaints
1. Customer complaints procedure
2. Customer complaints investigations and trends information
3. Staff awareness of customer complaints

Internal Audit
- Internal audit schedule

HACCP
1. HACCP Scope document
2. HACCP team list
3. Complete hazard analysis
4. CCP Procedures
5. CCP Training
6. Annual HACCP review
7. Prerequisite Plan (PRP)

Management of allergens
1. Allergen risk assessment
2. Allergen cross contamination procedures

Foreign body control
1. Foreign body risk assessment
2. Rinser residue analysis
3. Glass breakage procedure
4. Glass breakage inspection and sign off procedure and records
5. Final filter integrity test procedure and records
6. Rinser effectiveness annual verification

Pest control
1. Pest control map
2. Pest control certification
3. Pest control reports
4. Pest control corrective action

Residue testing
1. Residue testing plan

Raw material requirements and supplier approval
1. Supplier approval process
2. Supplier risk assessment
3. Water testing procedure
4. Gases certification / test results

New Product Development
1. New product development procedure
2. New product development sign off sheet

Packaging Control
1. Line clearance procedure and sign off
2. Packaging intake and storage procedure
3. Issuing packaging to line procedure
4. Label control record
5. Correct lot code procedure
6. Supplier risk assessment

Compliance to specification and non-conforming product
1. Non-conforming product policy
2. Quarantine procedure
3. Product specification

Chemical Control
1. Cleaning chemical procedure and records

Cleaning
1. Master cleaning schedule
2. Temperature validation record

Volume Control
1. Fill control record
2. Fill testing procedure
3. Underfill rejection procedure

Maintenance of equipment
1. Preventative maintenance schedule
2. Risk assessments for invasive activities
3. High risk activity equipment sign off procedure and records

Wine Testing and laboratory testing
1. TCA control policy
2. Calibration schedule
3. Ring test results

Appendix 2 – Withdrawal and Recall Template

- To support your recall and withdrawal procedures we will require the information below.

Product Information	
Reason	☐ **Recall** ☐ **Withdrawal** ☐ Practice
Reason for withdrawal / recall	
Product Name	
Date Shipped	
SKU	
Quantity Affected	
PO Number	
Lot Code	
Supplier / Site	
Country	

Appendix 3 – Technical contact list

Name	Role/Responsibility	Email	Telephone Number
Neil Dyas	Head of Technical	NDyas@Bibendum-wine.co.uk	0044 754064090
Jess Long	Technical Manager	Jlong@Bibendum-wine.co.uk	0044 7436260892
Ella Tebbutt	Technical Manager	ETebbutt@Bibendum-wine.co.uk	+44 7778 370727
Carly Fitzpatrick	Bulk Technical Manager	CFitzpatrick@Bibendum-wine.co.uk	0044 7971589222
Marketa Edwards	Customer Complaints Supervisor	MEdwards@bibendum-wine.co.uk	+44 7540 559 991
Maria Trabold Nicacio	Compliance Technologist	mtnicacio@bibendum-wine.co.uk	0044 785 511 2328
Shane Sarjooparsad	Compliance Technologist	ssarjooparsad@bibendum-wine.co.uk	

Appendix 4 – Canning Wine Guidelines

Parameter	Units	Recommended level for canning	Considerations
Residual Sugar	g/l	< 4g/l >4g/l increases microbial risks	>4g/l increases microbial risks when shipping, especially with low levels of FSO2
pH	mg/l	3.4-3.6	At a pH of <3.4 the risk of H2S formation in can may increase
Free SO2	mg/l	20 – 25	Pre shipping FSO2 levels must take account of levels needed at canning as well as levels needed to protect the wine during shipping
Total SO2	mg/l	As low as possible	
Molecular SO2	mg/l	<0.8 and preferably < 0.6	Molecular SO2 is dependent on the pH
Copper	mg/l	<0.2	Can be reduced with PVP/PVI products if necessary
Iron	mg/l	<1	
Chlorides	mg/l	<50	
Nitrates	mg/l	<40	
Sulphate		<80	
Conductivity	mg/l	Low	Can suppliers suggest lower conductivity is better
Dissolved O2 (DO)	mg/l	<1 pre shipping	DO should be monitored to ensure the quality of the wine is maintained. Once in can the wine is protected with N2 or CO2