

Greggs Field to Fork policy

Background information/context

1. Business strategy

Our strategic plan, launched in 2013, focuses on growing like-for-like sales by improving the quality of our existing estate and making our operation simpler and more efficient.

The plan has four key pillars, which are supported by our commitment to having a positive impact on people's lives.

- **Great tasting fresh food.**
- A great shopping experience.
- Simple and efficient operations.
- Improvement through change

Great tasting fresh food

Because we own and run all of our bakeries, we know, and can control, exactly what goes into our food.

Our unique recipes and daily fresh approach to food help to set Greggs apart and deliver simple, good quality, **great tasting fresh food** at affordable and competitive prices.

2. SR plan/strategy

We believe it is our responsibility to do business in a way that brings benefits to the people who shop with us, work for us, supply us, or live near us. In addition, we recognise our broader responsibility to respect the environment. Our social responsibility programme has five areas of focus, with a clear commitment against each one. These commitments are delivered through a series of projects with measurable targets.

- Customer health: We encourage healthy food-on-the-go choices
- **Responsible sourcing: We care about where our ingredients come from**
- Community: We share our success with the people around us
- Environment: We aim to use energy efficiently and minimise waste
- People: We are a great place to work

Responsible sourcing: We care about where our ingredients come from

Our customers trust us to do the right thing. That's why we continually improve the environmental, social and ethical standards of the products we sell.

As both a retailer and manufacturer of products, we stay close to the roots of where our food comes from. We focus on purchasing quality goods from over 2,500 great food producers, a number of whom we have been working with for decades.

We pride ourselves on paying promptly and rewarding suppliers of quality products with long-term relationships.

We are embarking on a journey with our producers to ensure that our relationships include engagement on sustainability. A key part of this is the development of a balanced scorecard for suppliers that will enable us to collaborate on improving performance on social and environmental factors.

We are members of the Supplier Ethical Data Exchange (SEDEX) and are encouraging our supply base to join the platform to help us ensure that labour standards in our supply base are observed.

Focus on Field to Fork

Aim

Greggs aim is to develop and implement practicable 'Field to Fork' standards which are consistent with Greggs company values and provide the framework of responsible, ethical and sustainable standards across our business. Greggs are a responsible company and strive to ensure that the impacts on our suppliers and growers are considered within our operation.

Purchasing decisions are made as ethically as possible within our commercial framework; ensuring that our supply needs are produced and delivered in a way that delivers high quality, hygiene and safety standards.

Scope

Greggs policy covers produce for use in our own brand products. It excludes factored goods sold under supplier brand. Greggs policy is applicable from the field to point of customer purchase.

Implementation

Greggs policy will be introduced in three phases:

Phase one: Fresh produce purchased by Greggs.

These products are defined as salad materials which Greggs use in our sandwiches and packaged salads as well as fruit which we sell loose or within packaged fruit pots.

Phase two: Produce for further processing within Greggs manufacturing sites.

These products are defined as fruit and vegetables (excluding those dried or heat treated) which Greggs use to produce savoury, confectionary and chutney products.

Phase three: Produce for further processing in products produced on behalf of Greggs.

These products are defined as fruit and vegetables excluding those dried or heat treated.

Timeframe for implementation:

- Phase one is to complete by the end of 2016.
- Phase two is to complete by the end of 2018.
- Phase three timings will be determined upon completion of Phases one and two.

Greggs approach to produce standards

Greggs has approved a list of produce/farm assurance schemes which include Red Tractor and GLOBAL G.A.P. (Good Agricultural Practice). It is a requirement that suppliers source produce, supplied into Greggs, which is accredited to these schemes or other equivalent schemes approved by Greggs prior to supply.

Suppliers using packing houses or sourcing produce from manufacturing sites must ensure that they are accredited to the BRC Global Standard Food Safety. In addition to this, the produce must originate from growers accredited to the aforementioned Greggs approved farm assurance schemes.

It is the supplier's responsibility to ensure that all required accreditations are up to date and current.

Greggs will not accept produce from any pack houses, manufacturing site or growers where the accreditation has lapsed. Greggs expect to be notified of any de listings as a result of this.

Greggs expectations of its suppliers

Traceability

Greggs suppliers are responsible for the traceability of produce and accuracy of up to date records for the produce supplied.

Greggs expectation is that its suppliers have full knowledge and mapping of its supply base. The protection and insurance of the product authenticity must be considered in line with this and the requirements of 'PAS 96:2014 Guide to protecting and defending food and drink from deliberate attack'.

Greggs expects its suppliers to be able to provide basic traceability information within 4 hours of request and full traceability, back to field, within 24 hours.

Microbiological quality

Greggs takes food safety extremely seriously and 'Ready to Eat' (RTE) produce must be in compliance with the legal requirements as set out in UK/EU legislation.

In addition, Greggs has specific standards which are applicable to the microbiological quality of the produce it receives. These are detailed within our Microbiological Standards (GTS-PD036) and include limits for coliforms and pathogens. All suppliers into Greggs need to ensure that these standards are met.

Greggs expectation is that for unprocessed produce the primary hygiene indicator to be used is coliforms. Although currently excluded from this policy, for heat treated produce the hygiene indicator to be used is enterobacteriaceae. Where coliforms are found to be trending over the specified limit the supplier will determine the dominant species and source.

If listeria spp is detected then enumeration and speciation is to be completed. Where *Listeria monocytogenes* is detected then Ribotyping must be conducted and results reported back to Greggs Supplier Technologists. If *Escherichia coli* is detected then the product should be retested including testing for *E.coli* 0157. Any identification of *E.coli* 0157 must also be reported back to the Greggs Supplier Technologists

Greggs expect to be immediately notified of any adverse results impacting on food safety.

Plant protection usage

The use of pesticides and treatments pre and post-harvest, should be kept to a minimum and produce grown with the European Union must be used in line with European Union Legislation (Regulation (EC) No 1107/2009). Produce grown outside the European Union must comply with source country legislation.

All growers must provide details of their proposed pesticide usage to Greggs suppliers for agreement. Those used must be authorised for use in the country of origin or by the Chemicals Regulation Directorate, for those grown in the UK, before they can be sold and supplied for use in the UK.

Plant protection products should only be applied when agronomic levels reach a critical threshold. They should not be applied routinely at set time intervals unless total loss of crop is the final outcome.

In the UK, operators must follow the guidelines in the DEFRA Code of Practice for the Safe Use of Pesticides on Farms and Holdings or its equivalent in devolved areas of the UK. This can be obtained from <http://www.defra.gov.uk/>. Similar standards of safe practice must be achieved by producers in other countries and must meet source country legislative requirements.

Plant protection products must only be used in strict compliance with manufacturer's instructions especially in respect of dosage rates and minimum harvest intervals. Harvest intervals may be extended wherever possible.

Greggs suppliers must have an agreed risk assessment for the sourcing of their raw materials. As a minimum this should be based on historic data, country of origin, relationship with grower, amount supplied and the PRC (Pesticides Residue Committee) residue testing schedule.

In addition to this a robust surveillance program for the testing of produce for plant protection product residues should be in place in order to ensure that the legally prescribed MRL's (Maximum Residual Level) are not exceeded. This must include at minimum, annual testing.

Greggs requirement is that no material is supplied into them that contains greater levels of plant protection product than those specified in the UK/EU regulations.

Greggs takes its Corporate Social Responsibility extremely seriously and as such fully expects that RTE product supplied into Greggs must be grown with due regard to the environment and all care taken to avoid pollution.

Genetically Modified Foods

Our Genetically Modified Materials Policy does not permit the use of Genetically Modified ingredients (GTS-PD037).

The use of Terminator Gene technology is not permitted by Greggs.

Greggs requires that no Transgenic GM (Genetically Modified) techniques are used for the transfer of genes into any part of the breeding programme that may be used in the production of the product supplied into Greggs.

Seed production and processing operations must implement all effective controls to ensure that GM DNA is not accidentally transferred into breeding material of products supplied to Greggs.

Where GM material is produced it must be effectively isolated from conventional seed crop production. All precautions must be taken to ensure that parent lines of product supplied into Greggs are not accidentally contaminated with GM DNA.

Seed production must be fully traceable from parent lines through production, processing and storage.

Land used for growing GM crops must not be used for a minimum of 5 years prior to planting any crops used to supply Greggs.

Irradiation

Irradiation techniques must not be used in the production of produce supplied into Greggs.

Composting

The use of animal manures in food crop production is potential hazardous. A number of human pathogens are carried and transmitted by livestock and have been shown to be capable of survival in soil for up to 18 months. It is possible for these to be transferred from soil into crops. The application of manure and other fertilisers must be in line with EU/UK and source country regulatory requirements. Robust procedures should be in place to ensure that safe compost is produced.

Human manure applications are not permitted.

All batches of compost must be tested for microbiological contamination and positively released.

Use of water

All water which comes into contact with produce for washing, fogging or water cooling must be of potable water (drinking water) quality – conforming to the requirements of The Drinking Water (Council Directive 98/83/EC).

The use of water must be minimised wherever possible and consideration must be made to the environmental aspect of irrigation and the potential for safe re use of water.

Sustainability

Growers used in the supply of product to Greggs must ensure that management methods are put in place to ensure protection in relation to biodiversity, wildlife and natural habitat where land is used to the maximum benefit.

Water resources must be used efficiently and a range of environmental and social factors in the local community considered.

Greggs expects its suppliers to retain information relating to sustainability for review if required.