Corrective Action Plan

Corrective Action Plan – non-compliances									
Non-Compliance Number *The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7*	**New or Carried Over** *Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding*	**Details of Non-Compliance** *Details of Non-Compliance*	**Root cause** *(completed by the site)*	**Preventative and Corrective Actions** *Details of actions to be taken to clear non-compliance, and the system change to prevent re- occurrence (agreed between site and auditor)*	***Timescale*** *(Immediate, 30, 60, 90,180, 365)*	**Verification Method** *Desktop / Follow-Up [D/F]*	**Agreed by Management and Name of Responsible Person:** *Note if management agree to the non-compliance, and document name of responsible person*	**Verification Evidence and Comments** *Details on corrective action evidence*	**Status** *Open /Closed or comment*
NC 1 3 Safety and Hygienic Conditions -1	New	**No training records / certificate of safety production knowledge and management skill for the principal in charge in the facility.** During document review, auditor found that the facility could not provide the training records / certificate of safety production knowledge and management skill of the principal in charge for review.	☒ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would arrange training for related personnel. Learn the relevant requirement to reduce such risks.	60 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		
NC 2 3 Safety and Hygienic Conditions -2	New	**No safety management certificate for special appliance.** During facility tour, auditor found that there were 5 cargo lifts in the facility for goods transferring and loading, however the facility could not provide the safety management for special appliance for review.	☒ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would arrange training for related personnel. Learn the relevant requirement to reduce such risks.	60 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		

NC 3 3 Safety and Hygienic Conditions -3	New	**No occupational health examination was provided to employees engaged in post with occupational disease hazards.** During facility tour, auditor found that 163 employees working in cutting workshop and 2 employees in zipper producing workshop were exposed to noise and 17 employees in laminating workshop and 31 employees in printing workshop with chemicals during working. However, no periodic occupational health examination reports which required by law for those 213 employees were provided for review.	☐ Training ☒ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would arrange occupational health examination for these employees as soon as possible. Learn the relevant requirement to reduce such risks.	60 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		
NC 4 3 Safety and Hygienic Conditions -4	New	**The facility did not conduct evaluation on occupational hazard factors.** During facility tour, auditor found that employees working in cutting workshop and zipper producing workshop were exposed to noise and employees in laminating and printing workshops with chemicals during working. However, the facility could not provide evaluation report of occupational hazardous factors in 2019 or 2020 for review.	☐ Training ☒ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would arrange evaluation on occupational hazard factors as soon as possible. Learn the relevant requirement to reduce such risks.	60 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		
NC 5 3 Safety and Hygienic Conditions -5	New	**Safety facilities for hazardous chemicals were not compliant with legal requirement.** During facility tour, auditor found that no secondary containers were available for 20% chemicals used and stored in the facility, such as glues, paints and solvent.	☒ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would provide secondary containers for these chemicals. Enhance employees training and on-site monitoring.	30 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		
NC 6 3 Safety and Hygienic Conditions -6	New	**Employees did not properly wear PPE (Personal Protective Equipment).** During facility tour, auditor found that total 48 employees working in the laminating workshop and printing workshop only worn the one-off mask during working, although the facility had provided active carbon masks to them. Remark: one-off masks were provided for epidemic prevention and control.	☒ Training ☐ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would monitor employees to wear PPE properly. Enhance employees training and on-site monitoring.	30 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		
NC 7 5 Living Wages	New	**Insufficient social insurance participated.** Through document review, auditor found that a total of 289 employees were currently working in the facility. As per the social insurance receipts of March 2020, 201 employees had participated in basic	☐ Training ☐ Systems ☐ Costs ☐ lack of workers	Facility would communicate with employees to expand	120 days	Desktop	Yes Ms. Dan Hui Cong /		

and Benefits-1		endowment insurance, unemployment insurance, maternity insurance, basic medical insurance and employment injury insurance. Remark: This is a new facility, which started their operation since 15th May 2019. Hence, only 11 months' social insurance receipts from May 2019 to March 2020 were available for review on the assessment day.	☒ Other – please give details: Most employees in the facility did not want to participate in the social insurance.	the social insurance coverage. Ensure to expand the social insurance coverage to comply with the law.			Operation Supervisor		
NC 8 6 Working Hours-1	New	**Overtime hours exceeded the legal requirement.** Through document review, auditor found that the monthly overtime hours of 26 out of 26 randomly selected employees were ranged from 42 to 60 hours in February 2020 (current month); 26 out of 26 randomly selected employees were 92 hours in November 2019 (random month); 26 out of 26 randomly selected employees were ranged from 88 to 92 hours in June 2019 (random month). Remark: This is a new facility, which started their operation since 15th May 2019. Hence, only 10 months' payroll records from May 2019 to February 2020 and 12 months' attendance records from 15th May 2019 to 8th April 2020 were available for review on the assessment day.	☐ Training ☐ Systems ☐ Costs ☒ lack of workers ☐ Other – please give details:	Facility would reduce the overtime hours to comply with the law. Facility would hire more employees to reduce the overtime hours to comply with the law.	60 days	Follow up	Yes Ms. Dan Hui Cong / Operation Supervisor		
NC 9 10B4 Environment 4–Pillar-1	New	**The facility did not perform monitoring tests for pollutants.** During facility tour, auditor found that the waste gas was generated from laminating and film blowing workshops on the 1/F of Building D, zipper producing workshop on the 2/F of Building D; and printing workshop on the 1/F and cutting workshop on the 2/F and 3/F of Building E. However, the provided monitoring report of waste gas did not cover waste gas from film blowing, zipper producing and cutting workshops.	☐ Training ☒ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The facility would arrange monitoring tests for pollutants as soon as possible. Learn the relevant requirement to reduce such risks.	90 days	Desktop	Yes Ms. Dan Hui Cong / Operation Supervisor		

Corrective Action Plan – Observations

Observation Number *The reference number of the observation from the Audit Report,*	**New or Carried Over** *Is this a new observation identified at the follow-up or one carried*	**Details of Observation** *Details of Observation*	**Root cause** *(completed by the site)*	**Any improvement actions discussed** *(Not uploaded on to SEDEX)*

for example, Discrimination No.7	*over (C) that is still outstanding*			
OB 1 Environment 4-Pillar 10B4-1	New	It was noted that the facility had not completed the SAQ and made it available to the auditor.	The facility didn't know this requirement.	The facility would complete the SAQ and have made it available to the auditor when needed.

Good examples

Good example Number *The reference number of the good example from the Audit Report, for example, Discrimination No.7*	**Details of good example noted**	**Any relevant Evidence and Comments**
Nil	None observed	N/A

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management) *If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.*		
A: Site Representative Signature:	Ms. Dan Hui Cong	Title Operation Supervisor Date 10th April 2020
B: Auditor Signature:	Joyce Zheng	Title Auditor Date 10th April 2020
C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.		
D: *I dispute the following numbered non-compliances:*		
E: Signed: *(If any entry in box D, please complete a signature on this line)*		Title Date
F: Any other site Comments: None.		

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a "root cause"

Example 1
Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2
A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3
A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re- occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.

Disclaimer:

Any proposed Corrective Action Plan (CAP) closed utilizing a Desktop Review is limited by the evidential documentation provided by the facility in order to correct the non-compliance. The intent of this service is to provide assurance that the facility is on the correct path with its proposed or completed corrective actions. Intertek cannot be held responsible for the falsification of evidence or the effective implementation of the proposed corrective actions, which in many instances may only be truly validated by an onsite Audit visit owing to the limitations of the desktop review process. The facilities shall be wholly responsible for the correct and effective implementation of their proposed CAP.

Intertek nor any of its affiliates shall be held liable for any direct, indirect, threatened, consequential, special, exemplary or other damages that may result including but not limited to economic loss, injury, illness, or death arising from the inability of a facility to implement its CAP.

Sedex

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You can leave feedback by following the appropriate link to our questionnaire:

Click here for Buyer (A) & Buyer/Supplier (A/B) members:
http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:
http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

Click here for Auditors:
https://www.surveymonkey.co.uk/r/BRTVCKP

Test Report **Report No.: GZAFN150401131-3** **Date: Apr 21 2015**

Client name:	GUANG XI FORESTRY LI PU PAPER CO.,LTD
Client address:	YU LEI WAN ,LIPU ,GUANG XI,P.R.CHINA
Sample name:	03--krft faced liner
Sample Batch No.:	9/4/2015
Product Date:	9/4/2015
Manufacturer:	GUANG XI FORESTRY LI PU PAPER CO.,LTD
Sample other information:	/

Above sample(s) was/were submitted and certified by the client, SGS quoted the information with no responsibility as to the accuracy, adequacy and/or completeness.

SGS Sample No.:	GZAFN150401131-3
SGS reference No.:	CANEC1505573903
Date of sample received:	Apr. 13, 2015
Testing period:	Apr. 13, 2015 ~ Apr. 20, 2015

TEST (S) REQUESTED:
Please refer to next page(s).

TEST METHOD(S):
Please refer to next page(s).

TEST RESULT(S):
Please refer to next page(s).

CONCLUSION:
Based on the performed tests on submitted sample(s), the results of Lead, Mercury, Cadmium, Hexavalent chromium, Polybrominated biphenyls (PBBs), Polybrominated diphenyl ethers (PBDEs) comply with the limits as set by RoHS Directive 2011/65/EU Annex II; recasting 2002/95/EC.

SGS-CSTC Standards Technical Services Co., Ltd. Guangzhou Branch

SGS-CSTC CONSUMER TESTING SERVICES SGS GUANGZHOU

.....
SGS Authorized Signature
Winnie Lee

This test report refers only to the sample(s) tested. This document cannot be used for publicity, without prior written approval of the SGS.

SGS 检测专用章 Testing Service SGS-CSTC Standards Technical Services Co. Ltd. Guangzhou Branch Electronic and Food Laboratory

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TEST (S) REQUESTED:
Selected test(s) as requested by the applicant
RoHS Directive 2011/65/EU

TEST METHOD(S):
(1)With reference to IEC 62321-5:2013, determination of Cadmium by ICP-OES.
(2)With reference to IEC 62321-5:2013, determination of Lead by ICP-OES.
(3)With reference to IEC 62321-4:2013, determination of Mercury by ICP-OES.
(4)With reference to IEC 62321:2008, determination of Hexavalent Chromium by Colorimetric Method using UV-Vis.
(5)With reference to IEC 62321:2008, determination of PBBs and PBDEs by GC-MS.

TEST RESULT(S):
RoHS Directive 2011/65/EU

Test Item	Limit	Unit	Method Detection Limit	Test Result
Cadmium (Cd)	100	mg/kg	2	Not detected
Lead (Pb)	1,000	mg/kg	2	5
Mercury (Hg)	1,000	mg/kg	2	Not detected
Hexavalent Chromium (CrVI)	1,000	mg/kg	2	Not detected
Sum of PBBs	1,000	mg/kg	-	Not detected
Monobromobiphenyl	-	mg/kg	5	Not detected
Dibromobiphenyl	-	mg/kg	5	Not detected
Tribromobiphenyl	-	mg/kg	5	Not detected
Tetrabromobiphenyl	-	mg/kg	5	Not detected
Pentabromobiphenyl	-	mg/kg	5	Not detected
Hexabromobiphenyl	-	mg/kg	5	Not detected
Heptabromobiphenyl	-	mg/kg	5	Not detected
Octabromobiphenyl	-	mg/kg	5	Not detected
Nonabromobiphenyl	-	mg/kg	5	Not detected
Decabromobiphenyl	-	mg/kg	5	Not detected
Sum of PBDEs	1,000	mg/kg	-	Not detected
Monobromodiphenyl ether	-	mg/kg	5	Not detected
Dibromodiphenyl ether	-	mg/kg	5	Not detected
Tribromodiphenyl ether	-	mg/kg	5	Not detected
Tetrabromodiphenyl ether	-	mg/kg	5	Not detected
Pentabromodiphenyl ether	-	mg/kg	5	Not detected
Hexabromodiphenyl ether	-	mg/kg	5	Not detected
Heptabromodiphenyl ether	-	mg/kg	5	Not detected
Octabromodiphenyl ether	-	mg/kg	5	Not detected
Nonabromodiphenyl ether	-	mg/kg	5	Not detected
Decabromodiphenyl ether	-	mg/kg	5	Not detected

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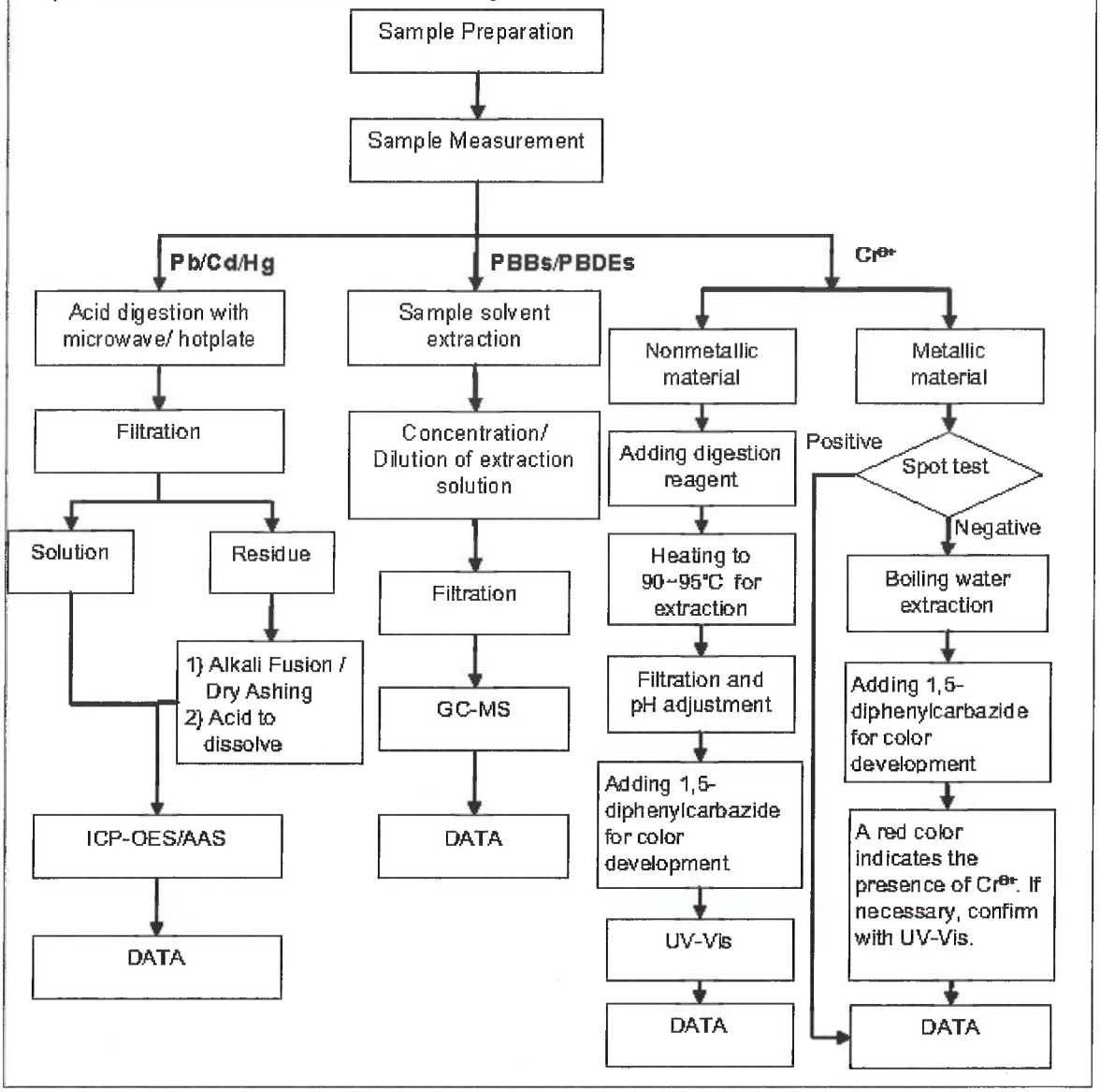
Notes:

The maximum permissible limit is quoted from the directive 2011/65/EU, Annex II.

ATTACHMENTS

RoHS Testing Flow Chart

1) Name of the person who made testing: Bruce Xiao / Sunny Hu
2) Name of the person in charge of testing: Bella Wang / Cutey Yu
3) These samples were dissolved totally by pre-conditioning method according to below flow chart (Cr^{6+} and PBBs/PBDEs test method excluded).

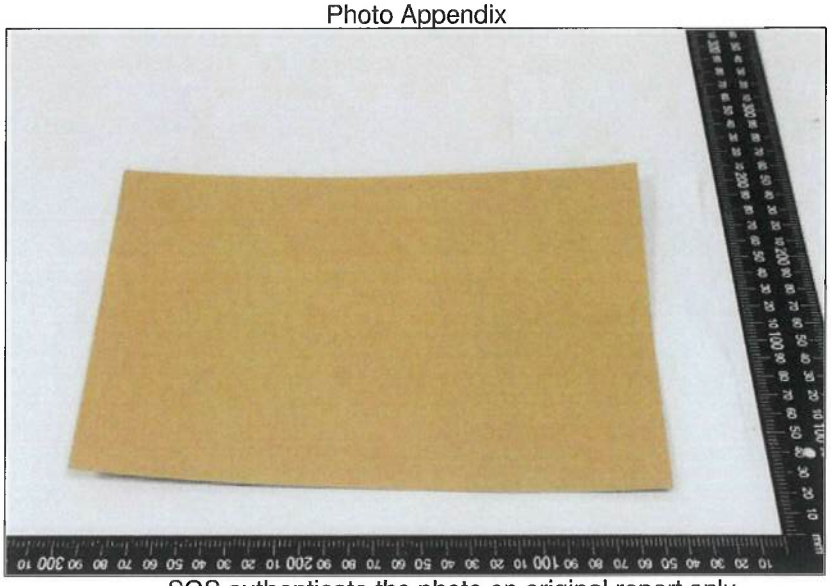


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SAMPLE DESCRIPTION: Paper sheet

Photo Appendix



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*** End of Report***

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Ever-glory Plastics Package Ltd.
ADD#52QingTangRD,,QingXiTown,DongGuanCity,GuangDongProvince,China
TEL:86-0769-87331711

LETTER OF DECLARATION

SUPPLIER: EVER-GLORY PLASTICS PACKAGE LTD

PRODUCTS SHIPPED TO HYDIX LTD ARE WITHOUT PFAS CHEMICALS.

SINCERELY

EVER-GLORY PLASTICS PACKAGE LIMITED

Tiffany Zhang

TIFFANY ZHANG

Dear Suppliers:

DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD

This request for information is made considering **requirements for substances in packaging** laid down in art. 5 of the Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC ("PPWR")[1].

The purpose of this request is to learn from our packaging suppliers what is their readiness to comply with the aforementioned requirements and how to demonstrate compliance of packaging materials, including food-contact packaging materials supplied to DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD with these requirements.

Please provide answers to the following questions and ensure that all statements made in this form are truthful and correct:

[Question 1 plus Appendix 1 is only for **food-contact** packaging suppliers]

1. PFAS

QUESTION 1. As of today, do all food-contact packaging materials supplied to *i* DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD **contain no PFAS (as defined by the PPWR[2]), in a concentration equal to or above the limit values determined in art. 5.5 of PPWR?**

Check "Yes" only if your food-contact packaging materials fall below *all three* limits listed below:

☐ **Yes** ☐ **No**

If "No", check below which limit is in excess and please attach phase-out plan by completing the form in **Appendix No 1**:

PFAS Limit (as per PPWR Art. 5.5)	**Answers**
(a) 25 ppb for any PFAS (excluding polymeric PFAS)	☐
(b) 250 ppb total PFAS (sum, with prior degradation of precursors, polymeric PFAS excluded)	☐
(c) 50 ppm total PFAS including polymeric; fluorine check ≥50 mg/kg	☐

[1] Full text here: Regulation - EU - 2025/40 - EN - EUR-Lex

[2] 'PFAS' means any substance that contains at least one fully fluorinated methyl (CF_3-) or methylene (-CF_2-) carbon atom (without any H/Cl/Br/I attached to it), except substances that only contain the following structural elements: CF_3-X or X-CF_2-X', where X = -OR or -NRR' and X' = methyl (-CH_3), methylene (-CH_2-), an aromatic group, a carbonyl group (-C (O)-), -OR'', -SR'' or –NR''R'''; and where R/R'/R''/R''' is a hydrogen (-H), methyl (-CH_3), methylene (-CH_2-), an aromatic group or a carbonyl group (-C(O)-).

[Question 2 is for **food contact and non-food-contact** packaging suppliers]

2. HEAVY METALS

QUESTION 2: Is the sum of concentrations of lead, cadmium, mercury and hexavalent chromium resulting from substances present in any packaging materials supplied to DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD within the limit determined in art. 5.4 of PPWR?

Heavy metals limit (as per PPWR Art. 5.4)	**Answer**
Sum of concentration of lead, cadmium, mercury and hexavalent chromium below 100 mg/kg	☐ Yes ☐ No ☐ No under condition*

**To glass packaging materials covered by the rules of the Commission Decision 2001/171/EC, this decision continues to apply until changed by the implementation acts.*

By completing this form, Supplier:

1) Confirms that all the answers provided are truthful and correct;
2) Commits to informing DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD immediately of any changes to the information provided.

Please complete this form and send to the following:

Supplier Name: DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD

Name of Supplier's representative filling in the form: TIFFANY ZHANG

Title: SALES REPRESENTATIVE

Date: 4.3.2026

Appendix 1 – Use of PFAS in food-contact packaging materials & Phase-out Plan

1. Please complete the following table or provide an equivalent document to provide details regarding current uses of PFAS in food-contact packaging materials used to manufactured DONGGUAN GAO ZHIYUAN PLASTIC PRODUCTS LTD products.

Item	Specification Number/Reference	PFAS substituted/ removal or reduction without substitution	Timing to reduce/phase-out	Timing for availability of new material for trial purposes
		☐Substituted ☐Removal/reduction		

Certificate CN23/00006582

This is to certify that

Dongguan Gao Zhiyuan Plastic Products Ltd.

No.52, Qingtang Road, Qingxi Town, Dongguan City, Guangdong Province, 523655 P.R. China

SITE CODE 1191718

has been assessed and certified as meeting the requirements of

Global Standard for Packaging Materials

Issue 7: October 2024

Achieved Grade: B+

Audit Programme: Unannounced (1 in 3)

For the following activities:

Film blowing with PE resin, gravure printing & relief printing, lamination, curing, slitting and bag-making of film & bags for food packaging. Raw materials include OPP/CPP/PE/PA/PET film, AL foil and paper.

Exclusions from scope: None

Product Categories: 2, 5, 7

AUDITOR NUMBER: 33194

Date of Evaluation: 28 September 2025
Certificate Issue Date: 06 November 2025
Re-Evaluation Due Date: 08 November 2026
Certificate Expiry Date: 20 December 2026

This certificate supersedes all other certificates bearing this certificate number with earlier certificate issue dates.

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L. Moran

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Business Manager
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Packaging Materials CERTIFICATED

UKAS PRODUCT CERTIFICATION 0905

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