Audit Report

Global Standard for Food Safety Issue 7: July 2015

1.Audit Summary			
Company name	Vion Food Group	BRC Site Code	1768974
Site name	Vion Boxtel BV		
Scope of audit	The slaughtering of pigs and the deboning and cutting to specification and packing in bulk and consumer packaging of pork, including Good Farming®-meat.		
Exclusions from scope	The intestinal washing process.		
Justification for exclusion	Segregated process with clearly differentiated products		
Audit Finish Date	2016-06-03		
Re-audit due date	2017-06-28		

Voluntary modules included		
Modules	Result	Details
Choose a module	Choose an item	
Choose a module	Choose an item	

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	A	Previous audit date	2015-06-03		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

3.Company Details

Address	**Boseind 10** **5281 RM Boxtel**		
Country	**The Netherlands**	Site Telephone Number	
Commercial representative Name		Email	**@Vionfood.com**
Technical representative Name		Email	**@Vionfood.com**

4.Company Profile

Plant size (metres square)	**10-25K sq.m**	No. of employees	**501-1500**	No. of HACCP plans	**1-3**
Subcontracted processes	**No**				
Other certificates held	ISO9001, IKB, custody	approved, QMS, QS, Better life 1 star, Chain of			
Regions exported to	**Europe** **Asia** **Oceania** **Other** Choose a region Choose a region				
Company registration number	**EG 61 NL**				
Major changes since last BRC audit	**New software system slaughterhouse, press and clipper at the packaging department, new evaporators, new chilling system for organs, new oven, new speed batching system, transfer of retail products (including employees) to Vion Groenlo BV, new suppliers of services (pest control and cleaning agent)**				

Company Description

Vion Boxtel BV is the biggest processing plant of pigs to meat and meat products in the Netherlands. The company is part of the Vion Food group. The company is slaughtering about pigs per day. Main customers are the retail plants of the Vion Food group (Vion Groenlo, Distrifresh) and the bacon plant for the British market and Asia (Vion Scherpenzeel), as well as companies producing for large retailers, such as The company also delivers directly to retail international and industrial customers. Legs are particularly produced for Spain and Italy. All pigs are bred by Dutch farmers and reared conform the Good Farming principles (IKB); a part of them are also reared regarding special Welfare demands. The company has a approved system (Green label) to comply with welfare demands. The company has ca. employees with a possible extension to workers. A considerable amount of the employees is working at a temporary base in 2 shifts. Most of them are from East European countries such as Poland. There are interpreters in the company for communication purposes. The company is certificated for ISO 9001 as part of a multi-site ISO system. Vion Boxtel is officially approved for export of pork meat to several third countries (e.g. Japan, Korea, Russia, Canada, Africa, China, Australia, China) The surface is 15.0 K sq. metres. The used quality system is based on one HACCP-study. The pork is packed at semi-bulk level and there are some vacuum packed consumer goods. EG number is NL61 EG. Website: www.Vionfoodgroup.com

5.Product Characteristics

Product categories	01 - Raw red meat Category Category Category
Finished product safety rationale	Chilled red meat, short shelf life 5-7 days and chilled red meat vacuum packed, short shelf life < 15 days
High care No	High risk No Ambient high care No
Justification for area	No high risk or high care production assigned on site. All products undergo full cooking prior to consumption.
Allergens handled on site	None Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	Welfare (GB = Good Farming Bacon) and BLK 1star (FS = Good Farming Star)

Product recalls in last 12 Months	**No**
Products in production at the time of the audit	**Raw red meat of pork from slaughtering till primary cutting: half carcasses, legs, shoulders, middles, bellies, necks, loins, 80/20 meat, minced meat, organs**

6.Audit Duration Details			
On-site duration	**24 man hours**	Duration of production facility inspection	**12 man hours**
Reasons for deviation from typical or expected audit duration	**No**		
Next audit type selected	**Announced**		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	**2016-06-01**	**9:30**	**17:30**
2	**2016-06-02**	**9:00**	**17:00**
3	**2016-06-03**	**9:00**	**17:00**

	Auditor (s) number(s)	Names and roles of others
Auditor Number	**108112**	**Lead auditor**
Second Auditor Number	**N/A**	

Present at audit Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref. clause 1.1.9)				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
- Plant Manager	**X**			**X**
- QA manager	**X**	**X**	**X**	**X**
- Department manager slaughterhouse		**X**	**X**	
- Department manager slaughterhouse		**X**		
- assistant Technical department	**X**		**X**	

Department manager cutting department		X		
Department manager veredeling department		X	X	
Production manager veredeling and packing department	X	X	X	X
- facilitair manager	X	X	X	X
Production manager Internal logistics and packing Asia	X	X	X	X
- Employee QA department			X	
- Manager HR	X			
Production manager Slaughter- and cutting department	X	X	X	X
- Manager F&A				X

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	**Clause**	**Details of non-conformity**	**Critical or Major?**	**Anticipated re-audit date**

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
01	1.1.3	The actions from previous management review were no part of the input for the management review over 2014/2015. In this way several action plans set after 2013/2014 were also the output of 2014/2015; eg.	We gathered the information of these actions. The follow up from all actions of the previous management review, will be added to the verification of the HACCP	We failed to report the follow up from the actions of the previous management review which were finished, and did also forgot to ad the follow up from	Evidence send by mail: the follow up and corrective actions taken including the status of the three actions	2016-06-30	Fully closed by

		actions about training and complaints modules.	system of 2015 / 2016.	the open actions. We will check if these actions are executed and if these are reported.	from previous management reviews.		
02	2.12.1	CP's are missing in the verification of the HACCP system. According to their own procedure P-VION-10004 version 5, CPs should be part of it. (38 new CP's are set in 4-2016)	Since April-2016 we record the CP's in an summary. This summery will be added to the verification of the HACCP system of 2015 / 2016.	In the last review, we only added the remarks of the CP's made during our (Pre-)SSOP. We forgot to record the CP's without any defects. We now record all CP's.	Evidence send by mail: status of the CPs since April 2016. (Follow up shall be given to the results and review in the HACCP team after a longer period)	2016-06-30	Closed by
03	3.5.1.2	Procedure P-Food-10026 "Procedure product and service requirements" revision 4 dated 25-11-2013 is not in accordance with the latest BRC7 requirements. Also the organisation does not work in accordance with this procedure: - for processing aids the use of release tests based on risks are missing at the plant;	We had a meeting with the group Quality manager and the Manager Purchase Non Food at 13-06-2016. There we discussed the non-conformances which were observed and planned the corrective actions. The release tests for processing aids are available, but because we still use the	The central office failed to adept the procedure to the latest BRC 7 requirements. The procedure (P-FOOD-10026) is now adapted. In this procedure, gas and dry ice are identified as low risk	Evidence send by mail: set up for new procedure including exceptions of pigs. (Follow up shall be given to procedure implemented,	2016-06-30	Closed by

		-for a supplier that has no GFSI certificate or hasn't had an audit, it was not provable that they are low risk -the exceptions for the pigs from farms, part of this procedure is not clearly defined	same materials, these test were performed, years ago. Therefor the QA manager was not aware of this. Procedure P-Food-10026 is altered to the latest BRC7 requirements, revision 5, ? ?-06-2016. PNF is adjusting their routine to the new procedures.	and therefore a HACCP certification is enough. The release tests are available and the QA manager is now aware where to find them. In P-NL –FOOD-10157 is the exception for the pigs farms stated. This is now linked in P-FOOD-10026	low risk and when still used, release tests)		
04	3.6.4	Information in the electronic system of the organisation (verified for the purchase of packing, ice and gloves) are older than 3 years: The system includes specifications, certificates and conformity declarations (eg. old specs and agreement dated 29-7-2008, HACCP certificate ; over due date)	At meeting with the group Quality manager and the Manager Purchase Non Food, actions are planned and executed. Correct documentation is asked for by de suppliers and added to	Due to the fact that the department of PNF reorganized, the importance of the documentation was not noticed. Now a new scheme is made and implemented. Certificates and conformity declarations are ordered from the suppliers and added	Evidence send by mail: examples of new declarations of conformity of Allvac (dated 14-5-2016) and new HACCP certificate of Yara Gas (Next audit	2016-06-30	Closed by - ....

				to The latest specifications, are added to	follow up will be given to the up to date information in		
05	4.4.11	The chatter proof protection of the bulb was broken (nearby line at the cell with hanging meat parts) and not seen during the PRE SSOP.	The line was immediately blocked. The chatter proof protection was replaced after 1 hour.	It seems that the bulb cover broke while wiping of the condense. This was performed around 08:00 hours. The Pre ssop already was performed at 05:00, and therefore the damage was not noticed during the Pre Ssop. We instructed the staff which wipe the condense to notify the manager immediately, when damage occurs or is noticed.	Evidence send by mail: photograph of replaced cover and instruction given and signed by responsible staff and signed	2016-06-30	Fully closed by
06	4.6.2	In the packing department (part of the cutting department) by incident the temperature measuring device was not disinfected directly before use. (In general good monitoring of	The alcohol wipes where provided directly after the observation. We also made a publication of the instruction. This is published at all areas where the temperature of the	The employee forgot to take the alcohol wipes from the office. The staff is reinstructed, always disinfect the probes	Evidence send by mail: instruction with photographs from disinfection before and	2016-06-30	Fully closed by

		temperature including correct disinfection and daily verification was seen during the audit).	meat is checked.	before and after measuring.	after using the equipment with signing of by responsible staff. Instruction will be put at the walls.		
07	4.7.1	The electronic maintenance system . did not react in May for the yearly calibration of the metal detection. Last calibration was executed on 19-5-2015.	As stated in minor 7 the calibration is now performed. The Functional Application Officer is contacted to investigate the possible cause, and to adapt the software.	It seems that there was a bug in the software. The periodic planned maintenance and inspections are all checked. The software is adjusted and tested if it performs properly	Evidence send by mail: Mails about corrective actions taken by . and calibration metal detection device dated 23-6-2016	2016-06-30	Fully closed by
08	4.10.1.2	Metal detection (CP) is used for meat and tongues. Validation including location of the equipment for tongues and best practice is not provable.	All the metal detectors are external maintained and calibrated on 23-06-16. Therefore the requested validation is provable.	The former calibration reports don't state a validation as required. Therefore all the metal detectors are external maintained and calibrated on 23-06-16. With the request of a validation.	Evidence send by mail: Calibration report including validation by from one metal detection device (Validation with	2016-06-30	Closed by

					report of not completely provable for all devices, follow up next audit)		
09	4.11.1	In general the site is well maintained. This is checked daily by PRE- SSOPs. During the audit some small deviations assessed: -Dirty ceiling in the corner of the cutting department (frequency of cleaning 2 times a year) -dirty air grid in the cutting department (it was changed but frequency and last change was not known) - Spots on junctions were meat parts come from the first floor to the ground floor (shaft).	After inspection we noticed that these were grease spots on the ceiling. They must come from the condense swapper, were some grease from the junctions was still on. They were not aware of the possible contamination through the swapper with grease. The grease is cleaned by the cleaning company.	We reinstructed the staff which performs the condense swapping, to swap the ceilings only with clean swappers. Also the staff which performs the Pre SSOP is instructed, to check more thorough. The ceiling, grid and junctions are cleaned.	Evidence send by mail: Instructions signed by responsible persons to swap the condense in a proper way and control the air grids during the Pre SSOP (daily verification)	2016-06-30	Fully closed by

Comments on non-conformities

Lloyd's Register
LRQA

Voluntary Modules Non-Conformity Summary Sheet

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company has a management team which meets regularly. Formal communication meetings are held at several levels within the organisation; weekly MT (Plant manager, 3 production managers, HR manager, Controller, QA manager and TD manager, Planner), daily level 1 (department managers, planning, F&A, QA, HR, FD and TD)), 3-dayly Team huddle (department manager, team leader and operators). Records seen: report Period 4-2016, planning boards and action lists.

Food safety and Quality is part of the policy "Passion for better food" P-BXT-NL-10126 and signed by the plant manager on 16-2-2016.
Relevant Quality Objectives for 2016 have been defined for Safety, People, Delivery and Costs.

The management review is kept at a yearly base, a clear management review June 2014 – June 2015 is demonstrable and discussed during the MT meeting of 27-10-2015. The review contains the verification of the HACCP system, complaints, the review of the objectives, training activities, changes and the preventive and corrective actions.

The management review contains also evidence for continuous improvement (e.g. PDCA cycle, projects and microbiological analyses by).

The 6 non-conformities identified at the previous BRC6 audit against the Global Standard for Food Safety are effectively corrected: the minors are all fully closed now.

Minor NC: actions from previous management review were no part of the input of last management review.

1.2 Organisational structure, responsibilities and management authority

The organisation is defined (Organogram 21-3-2016. is Site Manager from Vion Boxtel BV.
The departmental managers directly report to the Site Manager. The Key staff (Controller, HR Manager, Planner, Coordinator QA, Manager TD, Manager Service Bureau and the 3 production managers) directly report to the Site Manager.
All staff personnel have job descriptions. They give the summary, essential duties and responsibilities, prerequisites, physical demands and work environment. Assessed for QA Manager dd. 9-2014.
Procedure P-BXT-NL-10247 describes the arrangements for absence of staff.
There is a matrix in place for the production personnel to cover their experience and responsibilities.
Performance of personnel is monitored day to day with a formal review during the appraisal system.

Details of non-applicable clauses with justification

Clause reference	Justification

2 The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical and physical risks for all steps in the production process, packaging material and general elements. The HACCP analysis is carried out by the group QA department of the Vion Group and the results are locally translated to the process control plan for the plant Vion Boxtel BV.

The QA manager is the food safety team leader; he`s sufficient educated and experienced. Food safety team meetings are on request, but the team leaders of the safety team are also part of the MT (multidisciplinary composition) which meets weekly.(P-BXT-NL-10183)

The prerequisite programme is part of the QMS system and is based at EG 853 and EG 854 requirements. Verification by the daily pre-SSOP and SSOP checks.

Different product groups are distinguished (Procedure Products Boxtel P-BXT-NL-10.170:

- Fresh pork meat;
- By-products (category 3);
- Destruction material (category 2);
- Partially chilled pork meat (50% / 70%).

The intended use of the product by the customer has been clearly defined (within P-BXT-NL-10.170). No specific groups are applicable. The intended use is business to business meat products and a few vacuumed consumer products (Italy).

The company has defined 8 Critical Control Points (CCP's) relating to product safety and the scope of the BRC audit following P-FOOD-10000:

1. Faecal contamination of carcasses (Zero tolerance for visible faecal contamination);
2. Temperature control of animal by-products at dispatch <= 3°C vacuum <=2 °C;

3. Temperature control of fresh / vacuum packed pork meat at dispatch <= 7°C vacuum <=6 °C, organs <2 °C);

4. Temperature control of partially chilled pork meat (50%) at dispatch, <= 31,2 °C ;

5. Temperature control of partially chilled pork meat (70%) at dispatch <= 21,9 °C;

6. Temperature control of fresh pork meat at reception <= 7°C

7. Temperature control of returned animal by-products at reception <= 3°C;

8. Temperature control of returned fresh pork meat at reception <= 7°C / organs < 3 C.

The Hazard analyses of Vion Boxtel BV is documented as P-BXT-NL-10116, dated 05-01-2015. It will be renewed soon with remarks from Vion Central.
Flow diagram is prepared and available on VION on-line: P-BXT-NL-10248 from 4-4-2016. This procedure includes 6 flow diagrams: Entering pigs, Clean slaughtering, Chilling/ cooling, Cutting, Packing, Expedition.

Validation takes place of changes in products or processes, which may affect food safety aspects. Verified for the cooling of organs, report assessed from 29-3-2016.
Daily verification is part of the production process and assessed. The verification report of period July 2014-June 2015, as part of the management review is seen. Corrective actions are discussed in the MT-meeting.
Minor NC: CP's are missing in the verification of the HACCP system

Details of non-applicable clauses with justification

Clause reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

The company has a Quality Manual, complying with ISO 9001 and BRC 7 requirements, which states the company's commitment to quality and food safety. The quality manual is the total of all quality documents, including procedures, work instructions, HACCP analysis and registration forms.

3.2 Documentation control

3.5.3 Management of suppliers of services

Purchasing processes of transport, storage and services are centrally managed via approval procedures and contracts. The Vion plants are only authorised to order products or services from approved suppliers:
- Procedure requirements products and services' (P-FOOD-10026).

There's an audit plan for external suppliers, based on risk management.

3.5.4 Management of outsourced processing and packing

No outsourced processing (subcontracted: freezing of packed product in collaboration with customers.)
The cold store is an approved supplier.

3.6 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished products are available. Samples of specifications taken at this visit demonstrate control. This is verified for:

Requirements "Hamvlees 5D".pdf, "nek zonder knars gf", heart, Boneless Schouder 4D Gyros
Vacuum foil, , cleaning agents; , , white gloves.,
The specifications were present and accompanied by food grade declaration when relevant.

Minor NC: Information in the electronic system of the organisation (verified for the purchase of packing, ice and gloves) are older than 3 years.

3.7 Corrective and preventive actions

In general, good follow up was seen from corrective and preventive actions taken by the company; e.g., complaints, audits, PRE SSOP and SSOP inspections, out of spec analyses, blocked products. Improvement and prevent of recurrence of failures was provable.

3.8 Control of non-conforming product

Clear procedures for control of non-conforming products (e.g. fallen meat, blockades) are in place: P-BXT-NL10131. Products on hold are physically identified as such (red label/tape).

The procedure for non-conforming product defines how non-conforming product is identified, quarantined and disposed of. Only authorised personnel (QA Manager or department manager) is allowed to release products.

3.9 Traceability

Traceability system is well developed. It covers raw materials through work in progress to finished product including packaging materials and distribution according to 'procedure traceerbaarheid' (P-P-Food-10015). This system is fully based on written documents, batch codes and bar codes:
- Porks bear an earmark (+ accompanied by track record and VKI)
- Half carcasses get an EG-mark + serial number (together with date of slaughter + slaughter line number + origin)
- Technical parts (own production + additional purchase) get a batch code (EG-mark + date of production + origin)
- By-products get a batch code (date of slaughter / production)
- Finished product is traced depending on the date of production + calculation number + serial number of EG-mark (weighing label is scanned at dispatch)

An electronic quality manual named ' ' is in place. Changes in old versions of documents are maintained.

3.3 Record completion and maintenance

Records of the following controls are verified: SSOP, pre-SSOP's, CCP checks, the new CP checks (including metal detection). Records are retained for at least 2 years.

3.4 Internal audit

There are detailed schedules of internal audit against documented procedures, carried out by trained independent staff (Vion sister company employees). The audits have been carried out close to schedule and corrective action has been taken in a timely matter.

Twice a year the production sites and involved departments are audited. There is a schedule for the internal audits according to procedure 'interne audits' (P-VION-10011). The audit frequencies are based on the risk of the activity to the business, the operation and the customers. A hard copy of internal audit reports is maintained.

Non conformities are clearly listed with their corrective actions. Nonconformities seen for audit of 28 and 29-4-2016 (Vion audit) including verification of the nonconformities of 28-10-2015. Results of the internal audit are reported to the personnel responsible. Minor and Major nonconformities which arise are documented following the internal procedure. The corporate quality department has to accept the action plan suggested. Detailed records of former internal audits are available.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

The management of suppliers is a corporate responsibility within the Vion Group.
Vion Farming is taken care for the suppliers of livestock (pigs and cattle). Purchasing processes of raw materials (ingredients) and packaging materials are centrally managed via approval procedures and contracts. The Vion plants are only authorised to order products or services from approved suppliers:

- Procedure supplier's audit' (P-FOOD-10023);
- Procedure food supplier assessment' (P-FOOD-10025)
- Procedure requirements products and services' (P-FOOD-10026).

There's an audit plan for external suppliers, based on risk management

Minor NC: Organisation does not work in accordance with procedure of the HQ. And this procedure is not in accordance with the new BRC7 requirements for purchase.

3.5.2 Raw material and packaging acceptance and monitoring procedures

Livestock deliveries are checked at their requirements by an administrative check of the delivery documents before slaughtering. A veterinarian check at animal welfare and health aspects is carried out by the local veterinarian (employed by the government).
Vion Boxtel BV is also processing meat, delivered by other Vion plants (necks and bellies). The temperature of incoming meat is CCP6, but there were no fresh pork meat deliveries this year.
Packaging materials is inspected visual during delivery.

- Primary packaging materials are traced on the date of receipt / breaking into new batches
- Returned product + NAR (destination form)
- Retail (separate cell and label)

During the audit a traceability test was performed on Schouderknars ( ) Slaughter date 25/26 – 4- 2016 (production date 28-4-2016) including mass balance, specifications, process records, (pre shipment) checks and distribution details. The test was performed well within 3 hours, showing a good grasp of tracking and tracing of product and corresponding documentation.
Documents showed during the test: End product specification, CCP training documents, Control on cleaning (Agar and residues), Trend analyse agar control, Distribution documents, Weight lists, Label check, Traceability to slaughter house number, specifications of packaging material, trace on packaging material, monthly trend micro results, SSOP list, PRE SSOP, Verification list CCPs, Monitoring list CCPs, Pre shipment control list.

Yearly two trace tests are documented verified upwards 29-5-2016 and backwards 23-5-2016.

3.10 Complaint handling

Complaints are received by Sales at central office (Boxtel). Any complaints which are considered to be attributable to the site are communicated and investigated. The procedure for complaint handling (P-BXT-NL-10096) defines types of complaints and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action (corrective / preventive) as appropriate. All complaints are trended and reviewed by the site management team based upon database and weekly reported (K&M-monitor). There is a KPI on complaints (130/week). In 2014-2015 there were less achieved: 88 complaints a week: 6,4 complaints/week on food safety and quality, 1,8/week on labelling and packaging. There were 7 complaints last year about metal: 2 metal in tongues.

3.11 Management of incidents, product withdrawal and product recall

There is a company's crisis and recall management procedure P-VION-10015 dd. 4-12-2015, which covers the process which is applicable for all Vion sites. The procedure for non-conforming product defines 'incidents' and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action as appropriate. Business continuity guaranteed by central procedures and emergency coordination protocol. The local procedure Product recall P-BXT-NL-10024 defines the composition of the recall team and complies with these requirements.
The recall procedure is tested 1x / year (seen withdrawal from 7-1-2016; older product was packed). Report of this withdrawal assessed. Departmental feedback has been given. No recalls (but one withdrawal) since last BRC audit.

3.12 Customer focus and communication

Bulk products are delivered with product specifications based on customer requirements. Specific cutting requirements are documented in meat specifications assessed at the lines.

During the audit follow up was given to the requirements from one customer; Hamvlees 5D with specific customer requirements including micro analyses. Agreement was signed 12-2014.
Only 2 products are direct delivered as consumer products.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.3.4	No outsourced processes

4. Site standards

4.1 External standards

Site boundaries are clearly marked and fenced. Separate storage takes place for cleaning chemicals, lubricants and waste. The site is registered by The Food and Consumer Product Safety Authority (official approval EG 61).

4.2 Security

24h security during production days from 06:00 till 22:00 by own trained staff the rest is covered by . There is a system in place with badge control for employees and identification and badge control for visitors and contractors on all potential entry points to the plant.

4.3 Layout, product flow and segregation

The processing and packaging areas of the production are well designed and maintained to prevent risk of contamination. Premises are suitable for the intended purpose. Process flow is designed to minimise/prevent contamination and agreed with the Food and Consumer Product Safety Authority. Personnel-, material-, air-, water, waste-, services flows are designed and equipment placed in such a manner as to minimise the risk of product contamination.
No high risk or high care production assigned on site. In the low-risk areas, effective procedures are in place to minimise the risk of the contamination. Plan of 7-4-2016 assessed.

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

The internal condition of the site is suitable and satisfactory for the process. Walls, ceilings and floors were suitable in general. Floors are coated or granite and in good condition. Continuous attention is given to the condition of the floors. False ceilings are in place in manufacturing area, which are full closed. In case of glass windows, these are protected by foil. Suitable ventilation and cooling throughout the factory.

Minor NC: The chatter proof protection of the bulb was broken (nearby line and not seen during the daily inspection.

4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good level. The water used for cleaning and process is mains water. Testing of water (chemical/microbiological) is incorporated in the testing programme(s) P-BXT-NL-10009 and P-NL-Food-10.196C.The samples are analysed by , which is an ISO 17025 accredited laboratory (L132). Water quality is defined as a general control measure. A new plan of the water distribution system from 2016 is in place. Air flow is regulated; airflow directly in contact with meat (at cutting department) is filtered. These filters are controlled and changed each 2000 hours. Filter is a ' : 14 filter with an active coal filter, designed to filter particles to a high level. Specification and replacement of filter is demonstrably performed. Tests are executed 4 times a year, last tests assessed from 14-3-2016, with good results.

4.6 Equipment

All equipment was seen as suitably designed and used to minimise potential contamination. The used equipment is suitable for its purpose. New equipment is purchased as required and specified. Food grade / contact compliance documents were seen.

Minor NC: In the packing department by incident the temperature measuring device was not disinfected directly before use.

4.7 Maintenance

Equipment is maintained using the maintenance system ( ). Maintenance consists of employees; mechanics and a manager and assistant manager. Maintenance is also outsourced to established companies within the food and meat business. Registrations to confirm that the preventive maintenance or preventive controls have been carried out as planned are in place. New machines are directly incorporated in the system. Maintenance and activities for disturbances/failures are typically and preferably planned and carried out after production hours or in the weekend. Release of equipment after repairs and/or maintenance are signed off via the (pre)SSOP forms. Repairs/maintenance are communicated with team leaders and other relevant people, as well as the cleaning company, to keep focus on hygiene.

Lubrication is planned and all used lubricants are food grade with a FDA H1 status (food grade).

Maintenance people are trained on hygiene and contamination prevention. A sole washer is present at the entrance of the clean slaughtering department. Main Maintenance Department is separated from the production but in production also a technical department is available named "

Minor NC: The electronic maintenance system did not react in May for the yearly calibration of the metal detection.

4.8 Staff facilities

Canteen and changing rooms (production and dirty slaughtery) were assessed. Facilities are designed to a good level. Cleaning and maintenance is in good order, to prevent contamination or food safety risks. Outdoor clothing and shoes are stored separately from work wear.

Hand-washing facilities (with hand-free soap tap operation and air blade dryer / single use paper towels) were provided in toilets and at entry points to production areas. Before entering the production areas boot

washing and hand disinfecting equipment is installed.

Rest room and catering facilities are provided for staff ( ). A HACCP plan is applicable. Smoking is only allowed in a separated area of the canteen. No evidence of smoking was seen during the site evaluation. Proper storage areas and fridge were observed for brought food stuffs. Temperature is checked following . HACCP plan.

No high risk / high care operation

4.9 Chemical and physical product contamination control

Raw material handling, preparation, processing, packing and storage areas

Chemical cleaning agents are well controlled. Good manufacturing practices are in place in production. Storage and application of chemicals are in line with the requirements.

4.9.1 Chemical control

Chemicals/cleaning agents are stored separately and away from production. Authorised access by cleaning company and production department. MSDS available and specifications confirm suitability for use in food processing industries.

4.9.2 Metal control

The HACCP study has determined that metal detection is not necessary as CCP, but as CP. Registration and corrective actions could be demonstrated. A knife handling policy is in place.

4.9.3 Glass, brittle plastic, ceramics and similar materials

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. Glass / hard plastic audits are regularly carried out by production department (daily pre-SSOP and SSOP) and by maintenance department (1 x / 3 months -). New plans are made for 2016 to use instead of the register.

4.9.4 Products packed into glass or other brittle containers

No products packed into glass or other brittle containers

4.9.5 Wood

Wooden pallets are not permitted in production of meat products (only non-food area; storage of packing materials).

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

The HACCP study determined the metal detection step as a CP, not a CCP. Only 2 (direct) consumer products are processed on the premises. Checks are performed every hour. Employees for monitoring are trained by an instruction. During the audit the use and control of the metal detection equipment was assessed at the packing area and area for tongues.

Minor NC: Validation of the metal detection for meat and tongues including location of the equipment and

best practice is not provable.

4.10.2 Filters and sieves

Sieves and filters are not in use for product checks.

4.10.3 Metal detectors and X-ray equipment

Metal detection devices are used to check for vacuum packed products. Appropriate foreign body detection equipment (metal detectors) is in place, calibration of equipment is demonstrable. Metal detector check is performed correctly, as well as registration of results and, in case of non-conformance, corrective measures.

4.10.4 Magnets

Magnets are not in use for product checks.

4.10.5 Optical sorting equipment

No optical sorting equipment.

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

No glass jars, cans and other rigid containers

4.11 Housekeeping and hygiene

Cleaning is subcontracted and performed by in the evening / at night after production. Cleaning of equipment is carried out according to documented and detailed cleaning schedules. Procedure for cleaning and planning were assessed.

The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP), agars and swabs for pathogens (e.g. Listeria). Records of checks are maintained and were sampled during the audit, both of as the pre-SSOP lists. Cleaning schedules of are available and cover equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) were also assessed. Registrations are carried out correctly, deviations from schedule are followed up properly.

Specifications of the new cleaning agents delivered by (consisting of MSDS and food grade certificate) are present eg. . Other cleaning agent is still used eg.

Cleaning is validated 27-5-2016 and when the new cleaning agents are used the installation will be calibrated again. Dosage units are calibrated yearly by external party and supplier of cleaning agents (last time 4-4-2016). Cleaning agents are labelled and stored in a locked area. Segregation is used for cleaning agents and for internal use by Vion Boxtel.

Analyses are made of the controls for cleaning effectiveness. The results are discussed with and used for a bonus/malus system.

logbook was assessed, as well as several pre-SSOP's and the agar and swabbing results. Corrective action in case of unsatisfactory cleaning is demonstrable and registered on the pre-SSOP list (distinction is made between direct corrective measure, or repeating cleaning after production). Verification on cleaning takes place (F-BXT-NL-10005).

Minor NC: In general, the site is well maintained. This is checked daily by PRE- SOPs. During the audit some small deviations assessed.

4.11.7 Cleaning in place (CIP)

A cleaning in place system is used for the cleaning of the blood vessels and tank and the cleaning of knifes.

4.12 Waste / waste disposal

There are contracts with two licensed waste disposable companies:

- Paper-carton and other non food waste materials ( )
- Category 2 and 3 waste ( )

The waste collection is clearly identified during storage and stored segregated.

4.13 Management of surplus food and products for animal feed

It's the policy of the organisation not to use surplus food for third parties. There are 2 products going to consumers, those products are labelled at the end of the process. Products identified for waste are unpacked and segregated

4.14 Pest Control

New external subcontractor the pest control since 29-3-2016. Points of attention are:

- Rodents
- Cockroaches and crawling insects
- Flying insects

The frequency of control is 8 x / year; maintenance of EFK is 1 x / year and determination 4 x / year. All documentation is present in the contract map of and electronically. Analyses can and are made from this programme. Maps are available (online) detailing the location of baits / traps, electronic fly lamps, etc. All MSDS and specifications of used pesticides are present. No toxic pesticides are used in the production area. Infestations are reported via the online programme.

Records were seen from 25-3-2016, 4-4-2016, 21-4-2016 and 31-5-2016 including PRI (in-dept pest control survey).

Before 29-3-2015: (other service provider) trends are available and follow up of corrective actions. Extra actions were taken during pest activity from mice

Quarterly inspections are planned and performed by

4.15 Storage facilities

The company is producing fresh meat. The main part of the production is delivery daily fresh. Carcasses are stored 1 day before they are cutted and boned. Storage temperatures are controlled automatically via the system. Used temperature standards are in conformity with the legislative demands about

temperature, this is verified for the cooling department at the expedition
Production is organised based at the FIFO principle. Subcontracted storage and freezing at
and . Both cold stores are BRC-certificated for storage and distribution and approved suppliers.

4.16 Dispatch and transport

Temperature during dispatch of the product is a CCP. Records were verified during the audit and during the audit also the verification process of the organisation is checked (verification of temperature is daily performed by the organisation) via CCP checklist F-BXT-NL-10045. All checked CCP's are checked at random to verify correct measurement and registration, twice a day by production leader or other approved verifier on F-BXT-NL-10048.
Transport is organised and scheduled by the .. They are only making use of approved transport companies. Trucks are inspected for hygiene and temperature prior to loading. Results of these inspections are recorded on the CCP control forms F-BXT-NL-10045. There's a schedule for audits of the transport companies and a verification of the cleaning by agar samples.

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5.	No high risk, products undergo full cooking prior to consumption
4.3.6.	No high care, products undergo full cooking prior to consumption
4.3.7	No ambient high care, products undergo full cooking prior to consumption
4.4.4	No high care or high risk area
4.4.13	No high risk, products undergo full cooking prior to consumption
4.5.3.	No use of non potable water
4.7.5.	No high risk or high care area
4.8.4.	No high risk, products undergo full cooking prior to consumption
4.8.5	No high care, products undergo full cooking prior to consumption
4.9.4	No products packed into glass or other brittle containers

4.10.2	No filters or sieves used for foreign body control
4.10.4	No magnets
4.10.5	No optical sorting equipment
4.10.6	No glass jars, cans and other rigid containers
4.11.3	No high risk or high care area
4.11.4	No high risk or high care area
4.11.7	No cleaning in place
4.14.3	No own pest control
4.15.4	No controlled atmosphere storage required

5. Product control

5.1 Product design/development

The product development process is centrally organised within the Vion Food. There are no product development activities at the Boxtel site. New processes are validated before implementation.

Shelf life / best before date trials are coordinated by the central QA department of Vion Food, with the exception of shelf life trials on customer demand. Data derived from these tests is, when applicable, adopted by Vion Food. Shelf life trial samples are taken in conforming the central shelf life trial plan

5.2 Product labelling

Only 2 products are direct delivered as consumer products. Bulk products are delivered with product specifications based on customer requirements. For one customer with specific requirements an agreement was signed 18-12-2014, it includes positive release and more than the standard analyses each batch.

5.3 Management of allergens

No allergens on site under current scope, only production and handling of fresh meat.

5.4 Product authenticity, claims and chain of custody

Vion Boxtel uses the GoodFarming* mark for designated meats, which are controlled and monitored throughout the chain (from breeding, livestock/pigs to slaughter). Products of this label carry a "GB" claim at dispatch. Most of the processed livestock has a good farming * origin, this is more than the actual sales of good farming * products.

Daily a mass balance of the good farming * meat is made.

5.5 Product packaging

The packaging and supplier approval is controlled at Vion Food central office. The central system is a part of the multi-site ISO 9001 approval. Primary packaging materials are appropriate for the intended use. Product packaging material is checked against visual standards of acceptability upon arrival at the site. There is a separated storage area for primary packaging materials.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Livestock/pigs are controlled by a veterinarian during the arrival at the slaughter department and during the process in the clean slaughter line (control for diseases intestinal check).

All analyses (hygienograms, microbiology, water, etc.) are subcontracted to an accredited laboratory operating in accordance with ISO 17025:

A microbiological monitoring program 'procedure planning monstername 2015-2016' and shelf life testing program 'Houdbaarheidsonderzoeken' (P-FOOD-10010 and P-NLFOOD-10165) are in place and were assessed.

The frequency of monitoring depends on the risk:

Carcasses own production: daily microbiological analysis of TPC, entero's, Salmonella (process hygiene);

Deboned meat: 1 x / week microbiological analysis of TPC, entero's, Salmonella and Listeria;

Technical cuts, by-products and organs: 1 x / 2 weeks microbiological analysis of TPC, entero's, Salmonella and Listeria;

Besides above analysis specific tests on customer demand are executed.

5.6.2 Laboratory testing

Results of TPC and pathogens (every thousand carcass) are analysed and reported on a monthly basis (KPI reporting). Trend graphs are applied. Results are analysed at trends at a monthly base (Q report). Tests were assessed for raw materials and finished goods eg. microbiological results from 28-4-2016 till 27-5-2016, Neck without bones 10-2015, 11-2015, 3-2016, 4-2016, tests performed on trimmings 9-3-2016. Corrective actions are taken when limits are exceeded (besides better performance a new decontamination oven was installed)

5.7 Product release

Products are released after the pre shipment controls, which are carried out by the expedition department. The verification of CCP controls is part of the pre shipment process. Verification procedure and checklists were assessed during the audit at dispatch and during the traceability test (F-BXT-NL-10048).

Details of non-applicable clauses with justification

Clause reference	Justification
5.3	No allergens on site

6. Process control

6.1 Control of operations

Process conditions and methods are well monitored and re-validated when deemed necessary. In case of breakdown of critical equipment (e.g. cooling system) a system and procedure is in place for the proper handling of product. Verification of process and equipment takes place once a year. The results are used and discussed as input in the yearly management review. QA monitors aspect of the controls that might affect food safety, legal and quality characteristics. The control of operations is partly at visual inspection during the process by operators and supervisors. Checks are made on the SSOP forms for process controls, such as temperatures.
The cooling system is automated and registered real time.

Maintenance of the cooling equipment has the highest priority. Real-time temperature-recording equipment is linked to an automatic alarm system. Alarms are set and maintenance department is notified of any alarm. The system is tested regularly.

6.2 Labelling and pack control

Packaging takes place in line with production planning and customer requirements. QC tests (product labelling, traceability code, shelf life, disclaimer, seal control) carried out in accordance with specifications. At the packing department, checks on labelling are carried out between batches, except for the organs heart and tongue on two lines. These products are checked on labelling also after pelletizing to ensure that correct labels are used.

6.3 Quantity, weight, volume and number control

All products are sold by weight. Weighing scales are in place and subjected to calibration and maintenance programme. Calibration reports of the weighting scales 04A and 04B dated 26-3-2016

assessed.

6.4 Calibration and control of measuring and monitoring devices

Critical measuring equipment are thermometers (CCP related), weighing scales and metal detection equipment. These are calibrated. Records were available.
The equipment used to measure on CCP's is identified. List of measuring devices in place. Calibration due date on equipment. Seen calibration on temperature device equipment 203 and 112 dd 4-5-2016 with referential temperature device 10410186 calibrated by 1-3-2016. Metal detection device was calibrated 19-5-2015 (see deviation at 4.7.1).

Details of non-applicable clauses with justification

Clause reference	Justification

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

The HR department is responsible for archiving and monitoring training records. CCP trainings for CCP 1 to 8 was seen for several operators and workers (Training on CCP every 3 year, powerpoint presentation by QA). The hygiene training/induction training with test was assessed during the audit.

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

The standards for personal hygiene are documented in the QMS as P-FOOD-10017. The document is covering the requirements of the BRC 7 standard. The wearing of any jewellery isn't allowed.
Effectiveness of the hygiene procedures for personnel is part of the SSOP systematic.
A sample of each batch metal detectable plasters is demonstrable tested.

7.3 Medical screening

The medical screening is part of the intake of new employees and part of the instructions to visitors. Assessed for several workers, among which temporary workers. (Review every 5 year). The site makes all visitors, new starters and contractors aware of the need to report infectious disease during the intake by the porter before entering the site. In case of a disease the company is consulting a specialised company doctor. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

7.4 Protective clothing: employees or visitors to production areas
Protective company clothing is facilitated to all staff, temporary workers and visitors and changed daily. Workers are divided per rank and agency by different colour hair nets. The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined (P-FOOD-10017). These hygiene rules are effectively enforced and daily inspected as a part of the SSOP control. Protective clothes are provided in sufficient numbers. The laundering of protective clothing is outsourced to a contracted and specialised laundry . The wearing of sleeves, aprons and work coats isn't allowed during eating and smoking. Disposable hair nets are in use; bear snoods are in use. Cleaning facilities are provided.

Details of non-applicable clauses with justification

Clause reference	Justification
7.4.4.	No high risk or high care area

Module 8 - Traded Goods

Scope

8.1 Approval and performance monitoring of manufacturers/packers of traded food products

8.2 Specifications

8.3 Product inspection and laboratory testing

8.4 Product legality

8.5 Traceability

Module 9: Management of Food Materials for Animal Feed

Scope

9.1 Management Commitment

9.2 HACCP

9.3 Outsourced Production

9.4 Specifications

9.5 Traceability

9.6 Chemical and Physical Product Contamination Control

9.7 Labelling

9.8 Training