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# Audit Report

Global Standard for Food Safety Issue 7: July 2015

1 Audit Summary			
Company name	Vion Food Group	BRC Site Code	9714502
Site name	Encebe Vleeswaren B.V.		
Scope of audit	Producing (cutting, slicing, mincing, blending, fermenting, pasteurising, sterilising, marinating) and packing (modified atmosphere, chilled, frozen, canned) of meat products of beef, pork and poultry in consumer and bulk packaging.		
Exclusions from scope	none		
Justification for exclusion			
Audit Finish Date	2015-11-17		
Re-audit due date	2016-12-17		

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

2 Audit Results					
Audit result	<b>Certificated</b>	Audit grade	<b>AA</b>	Audit type	<b>Announced</b>
Previous audit grade	<b>A</b>	Previous audit date	<b>2014-12-17</b>		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	4



3. Company Details			
Address	Boseind 10, 5281 RM Boxtel		
Country	Netherlands	Site Telephone Number	+31 411 658736
Commercial representative Name		Email	@vionfood.com
Technical representative Name		Email	i@vionfood.com

4. Company Profile			
Plant size (metres square)	No. of employees	No. of HACCP plans	1-3
Subcontracted processes	No		
Other certificates held	ISO 9001, Skal, 'Beter Leven Kenmerk'		
Regions exported to	Europe Choose a region Choose a region Choose a region Choose a region Choose a region		
Company registration number	EG-61-NL		
Major changes since last BRC audit	No major changes since last audit		



Company Description

Encebe Vleeswaren BV is a middle-sized producer of meats and sausages and is part of the Vion Food group, which is the biggest producer of meat in Western Europe. The company is located in Boxtel at the same location as the slaughterhouse of Vion Boxtel. Encebe Vleeswaren BV has employees in a one shift operation (excepting smoking and slicing department: 2 shifts). Only a small part of them is working at a temporary base.

The company is producing and selling ca. different final products divided into several product groups of meats and sausages: cooked sausages, sterilised products and fermented sausages. Most of the products are produced by the own production process. Additionally purchased product (poultry) sliced and packed in a special department. The production quantity is approximately per week. The company is also producing an assortment of products based on organic raw materials (SKAL certificated).

The company is certificated for 'Beter Leven Kenmerk' and ISO 9001 as part of a multi site ISO system.

Main selling market is the industrial market and a minor part at the retail (supermarkets). The strategy is focused at growth in the industrial market, for which an assortment tailor-made product is produced, and growth in the retail market of sliced ready to eat meat products. Since the previous audit no major changes in processing, equipment, routing and assortment have been occurred.

Official approval EG-61-NL of the Food and Consumer Product Safety Authority

5: Product Characteristics	
Product categories	08 - Cooked meat/fish products 09 - Raw cured or fermented meat and fish Category Category
Finished product safety rationale	Finished product safety rationale Short shelf life, presence of preservatives, packed at modified atmosphere or vacuum, cooked, chilled, frozen, hermetically closed casing or vacuum packaging or canned.
High care	Yes
High risk	No
Ambient high care	No
Justification for area	Preservation of products is based on the combination of a heath treatment and another preserving method; eg acetate, diacetate.
Allergens handled on site	Mustard Celery Cereals containing gluten Milk Soya Sulphur dioxide and Sulphites Legume Glutamate Carrot Corn Coriander Choose an allergen Choose an allergen Choose an allergen Choose an allergen



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Product claims made e.g. IP, organic	Organic, non GMO (maize, soya) 'Beter Leven Kenmerk'
Product recalls in last 12 Months	No
Products in production at the time of the audit	"rookworstschijfjes 5 mm", "ontbijtspek", "staple pack schouderham"



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6: Audit Duration Details			
On-site duration	16 man hours	Duration of production facility inspection	8 man hours
Reasons for deviation from typical or expected audit duration	Complex organisation, lot of different production department with their own processing methods and type of products		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2015-11-16	9:15	17:00
2	2015-11-17	9:15	17:30

Auditor (s) number(s)		Names and roles of others
Auditor Number	108053	- Lead assessor
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
General Manager	x		x	x
VION Food Nederland and Distrifresh	x		x	x
Quality Manager	x	x	x	x
Quality Assurance Assistant		x	x	x
Production Manager	x	x		x



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HR-Manager	x		x	x
Commercieel manager	x			x
Employee Service Bureau			x	x
New Product Development			x	x
HRM employee			x	
Expedition / Slicing		x		
Employee Raw Material Storage		x		
Foreman cutting department		x		
Operator Cooking line, smoking Department		x		
Receipt		x		
Maintenance		x		
Industrial Department		x		
Employee Curing Department		x		



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# Non-Conformity Summary Sheet

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

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



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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 document, photograph, visit/other	Date reviewed	Reviewed by
1	3.2	The CCP documentation is not consistent. The procedure "proces beheersplan 13-01-2015" (Risk assessment) notes a control measure for CCP 4 (pasteurisation) based on temperature checks each half hour. In practise the checks are	Risk assessment P-NCB-NL-10027 is adjusted. The check of each half hour is changed into continual checks.	In the past an employee has copied the line temperature control from CCP7 to CCP4 and copied the temperature check every half hour. It should be: checked continual.	Seen P-NCB-NL-10027 Revision 18 dated 23-11-2015 Fully Closed	2015-12-03	





	<p>done on the continual process registrations (time and temperature graphics) of each batch. The numbering off the CCP's is also not consistent in the documentation. (Reason minor NC; during the audit control measures were executed and demonstrated according to the specific CCP procedures.)</p>					
2	<p>3.5.1.1 For supplier C. (chicken meat products) no actual performance assessment (review) was present. There is an ongoing system for monitoring. The review is on a quarterly base. For 2014, 2015, no review results could be shown for supplier C.</p>	<p>Verification has taken place and the supplier is added to the quarter review.</p>	<p>is a small supplier of biological chicken meat products and by accident forgotten during the review. The supplier is added to the quarter review, so there will be no repeating.</p>	<p>Seen evaluation done on supplier C. Done on 30-11-2015. Fully Closed</p>	2015-12-03	
3	<p>4.2 No documented assessment and verification has been done on: site security arrangements, control measures to prevent malicious contamination and food fraud. (reason</p>	<p>Verification has taken place and documented.</p>	<p>In the last review bio-security was not a subject yet. This is why it was not a part of the review. Bio-security is now a part of the review so that there will be</p>	<p>Seen evaluation done on 27-11-2015 (reported on 30-11-2015). Fully Closed</p>	2015-12-03	



	<p>for minor NC In practise adequate control measures have been taken according to accessibility of the site, personal screening and chain of custody programmes).</p>		<p>an exclusion of continuation.</p>			
<p>4 4.15.1</p>	<p>In the cooled storage at the receipt department, several pallets with meat are not adequately protected against contamination. The protecting foil is damaged and meat is pouring out on several pallets with meat (standaard vlees).</p>	<p>Control of contamination will be a part of the procedure Pre-SSOP and SSOP and cross contamination will be an aspect of CP2. The management of the department is instructed to registration of CP2 and correcting possible</p>	<p>During working in the cooled storage (cel 113) are several pallets containing standard meat damaged. During the Pre-ssop and ssop inspection rounds the damage was not notified or corrected.</p>	<p>Seen training given and point added to the Pre-SSOP and SSOP list.  Closed : point will be followed up the next BRC evaluation.</p>	<p>2015-12-03</p>	

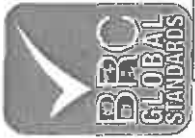
<p>Comments on non-conformities</p>
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## Voluntary Modules Non-Conformity Summary Sheet

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



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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



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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



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## Detailed Audit Report

Details of non-applicable clauses with justification	
Clause reference	Justification
3.5.4	No primary product processes are outsourced.
4.3.5, 4.8.4	No High Risk area
4.3.7, 4.8.5	No ambient High Care area
4.5.3	No unpotable water used
4.9.4	No products packed in glass
4.10.2	No sieves in the processes
4.10.4	No magnets in the processes
4.10.5	No optical sorting equipment
4.11.7	No CIP

### 1. Senior management commitment

#### 1.1 Senior management commitment and continual improvement

The by . General Manager, signed Management Review (2014/2015) shows a good working Quality Management System.  
Clear objectives are part of the Management Review (MR), concerning quality, hygiene and complaints. They are monitored monthly. Complaints on foreign body (plastic) are still an issue. Several improvements projects (eg. A3 verbeterplan on foreign bodies) are ongoing in response of the appointed actions in the MR.  
Through the stated objectives and during the evaluation, it is demonstrated that the senior management commits itself to the quality management system. The commitment of the general management is also demonstrated by the membership of the HACCP team (chairman).



The management team showed commitment to the QMS which is also evident in the systematic for continuous improvement, e.g. PDCA cycle of the multi-site ISO 9001:2008 approval. Internal communication is conducted by daily white board (Hurdle/Tier) meetings with all employees. Several samples of this type of communication seen and discussed with the responsible department manager. A good system of presenting issues like (product) quality, improvement actions and complaints seen.

The company demonstrated a system which is maintained and compliant with the process controls and is effective in meeting customer, process and product measures. There was no evidence that a lack of resources had substantially affected the running of the QMS.

The MR contains the relevant review subjects (objectives, complaints, verification and validation of the management system, CCP control, PRP control). Plan is to do the review on a quarterly base instead of once a year.

There is an organisation with short communication lines (effective) and a direct control of the production by the management. Communication (Procedure Overlegstructure P-NCP-NL-10006 ) is conducted by:

- White board communication (Hurdle Tier boards); concerning quality issues
- MT-meeting once per week;
- PPD-meeting & HACCP team meetings once per 4 weeks;
- Employees meeting once per year;

This year the company was involved in a withdrawal action because of lumps in a spice mix. (Adequate actions, towards the supplier of the mix and the customer of the finished product, have been taken and are reported. It was not a food safety issue.) There were no recall actions.

The General Manager attends the opening and closing meeting. All intensions were discussed during the opening meeting with the General Manager

Root causes of the 4 minor non-conformities of the last BRC audit have been identified. The NC's did not reoccur.

## 1.2 Organisational structure, responsibilities and management authority

The organisational structure is clear and part of the QMS. The various production departments directly report to the production-manager. The production manager is member of the MT. The QA manager informs the general manager concerning food safety issues, complaints and results of internal auditing. The responsibilities, authorities and reporting relationships of all staff members are described in the job description.

## 2 The Food Safety Plan – HACCP

Based on the principles of the Codex Alimentations, in a manual a complete system has been documented and implemented in practice. At VION Food NL level a thorough HACCP analysis (P-VION-10000) is made and available for the sites. The local HACCP system (P-NCB-NL-10027 was developed by a multi-disciplinary HACCP team, namely General Manager, QA Manager, Quality Assurance Assistant, Production Manager and team leader. All team member's shows enough and the right experience and knowledge.

Flow diagrams are prepared and available in All process steps were shown. Verification is  
done yearly. A good detailed lay out was shown in the manual as well as process flows. Employee, Raw  
materials, Product and waste flow are determined on the lay out.





The HACCP system has full management commitment and is an integral part of the company's Quality Management System (QMS). The HACCP was found to be well documented and effective. Full product description including microbiological limits and shelf life is in place. The intended use (B to B/Consumer Products) of the product by the customer has been clearly defined

Each identified hazard was reviewed and given a risk rating to define the severity (1 – 3) and likeliness (1 – 3) of a hazard occurring. The risks ( $R \geq 3$ ) have been defined from the hazards with adoption of a decision tree: Risk < 3 = PRP, Risk 3 or 4 = CP, Risk 6 or 9 = CCP. Assessed:

- Procedure Procesbeheersplan Encebe Vleeswaren (P-NCB-NL-10027 dd 13-01-2015).
- Summary Allergens and CCP's

CCP's which are determined, including critical limits, according to P-NCB-NL-10027 dd 13-01-2015:

- CCP 1. Temperature control of (returned) fresh pork meat / beef at reception ( $\leq 7^{\circ}\text{C}$ )
- CCP 2. Temperature control of (returned) animal by-products/organs at reception ( $\leq 3^{\circ}\text{C}$ )
- CCP 2. Temperature control of regular meat at reception ( $\leq 2^{\circ}\text{C}$ )
- CCP 3. pH after fermentation process ( $\text{pH} \leq 5,3$  within 45 and 84 hours)
- CCP 4. Temperature control of heat treated meat products pasteurization ( $P70 > 3$  minutes)
- CCP 5. Temperature control of heat treated meat products sterilization (2,45 hours at  $106^{\circ}\text{C}$ )
- CCP 7. Cooking ( $P70 > 3$  minutes)

Critical limits have been defined for each CCP and are related (if applicable) to the legal temperature requirements for meat and meat products. CCP monitoring has been defined and documented.

Corrective actions are clearly defined according to the CCP overview. The CCP's were demonstrated, including a well recording during the audit, including corrective actions. Verification during the year is demonstrable. Several reports seen.

Each employee involved was trained. Records of CCP monitoring and verification show measurements are carried out by authorised persons as planned.

### 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, which state the company's commitment to quality and food safety. The quality manual is the total of all quality documents, going from the policy, over system procedures, working procedures, work instructions, registration documents. An electronic quality manual named ' ' is in place and available to departmental managers.

#### 3.2 Documentation control

A document control procedure (P-NCB-NL-10007) controls the issue of documents to ensure they are at the correct issue status at points of use or reference. It also includes how obsolete documentation is handled.

Minor NC 3.2 concerning CCP documentation control see NC table.

#### 3.3 Record completion and maintenance



The procedure for quality records (P-NCB-10011) defines how long records are maintained, how they are reviewed and where they are stored / archived. Most records are hand written. All documents are kept for at least THT + 12 months. Longest shelf-life is 15 months (sterilized products). All electronic data are secured by daily back-ups.

#### 3.4 Internal audit

There are detailed schedules of internal audit against documented procedures, carried out by trained independent staff (from the VION company). All departments are included in the plan. The audit is done twice a year. One unannounced and one announced audit. The audits have been carried out to schedule (May & Nov 2015) and corrective action has mostly been taken in a timely manner. In addition, hygiene audits and site / building inspections are performed at monthly intervals.

Assessed: Unannounced audit report 12-05-2015.

Minor NC 3.5.1.1 concerning the review of meat product supplier C see NC table.

#### 3.5 Supplier and raw material approval and performance monitoring

##### 3.5.1 Management of suppliers of raw materials and packaging

All suppliers of products have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL). Approval is on base of a questionnaire and a GFSI certificate and or an audit.

Suppliers performances are well monitored and followed up. The risk assessment depends on the kind of material and is based on enquiries, specification / food grade declaration, trial delivery and GFSI certificated QMS of the supplier and microbiological performance (meat suppliers). Close communication was demonstrated. All suppliers of packaging have to be approved by the central VION office and entered into the system before they can be used.

Assessed: "Leveranciers beoordeling 2015"

Risk assessment on Food fraud is done by Vion Central and implemented in the risk assement of ENCEBE.

##### 3.5.2 Raw material and packaging acceptance and monitoring procedures

All suppliers of products have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL). Approval is on base of a questionnaire and a GFSI certificate and or an audit.

##### 3.5.3 Management of suppliers of services

All suppliers of services have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL).

Suppliers performances are well monitored and followed up. The risk assessment depends on the kind of material and is based on enquiries, specification / food grade declaration, trial delivery and GFSI certificated QMS of the supplier. Close communication was demonstrated.

Assessed: Monitoring and review for cleaning company C 2015



### 3.6.4 Management of outsourced processing and packing

No primary product processes are outsourced.

### 3.6 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished products are available through \_\_\_\_\_ and managed by the involved departments. Specifications are reviewed internally to ensure they are correct and up to date. Food specifications (meat-containing raw materials + finished products) managed by PPD reviewed twice a year. Other specifications checked 1 x / 3 years. Specifications contain relevant aspects and requirements. Samples of specifications taken at this visit demonstrate control, eg:

- " , " 26-10-2015
- Top belt Slice department line 5 19-05-2010

### 3.7 Corrective and preventive actions

Corrective action systems is based upon the information from internal audits, SSOP, pre SSOP, hygiene audits, pest control, non-conforming product, complaints etc. Action plans (overviews) are in place. For daily actions the hurdle white boards system is used.

### 3.8 Control of non-conforming product

Non-conforming products / products on hold are physically identified as such with a red coloured label. There is a clear documented procedure for the identification and disposal of non-conforming product. (P-NCB-NL-10013). Direct action towards non-conforming products was clearly demonstrated during the audit.

### 3.9 Traceability

Traceability system is well developed. It covers raw materials through work in progress to finished product including packaging materials and distribution. This system is fully based on written documents, batch codes (input → output per process step), bar codes and an ERP-system \_\_\_\_\_ according to 'procedure identification – traceability'. A suitable system has been explained during the audit. The way of coding was shown during the audit.

Suppliers are approved by Vion Central bases on audits and approval for a GFSI approved system. Also questionnaires are used.

Test for recall and traceability at least annually: performed on 07-01-2014 and 13-10-2014, including mass balance, for final product to raw material. oké

A vertical test with documentation (records), during the audit was tested for a delivery "tongveles 11-11-2015"

Fast tracing (forwards/backwards, including packaging) was possible within the records.

Information was available within time. Mass balance, for raw material to final product was oké

### 3.10 Complaint handling

The procedure for complaint handling 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, weekly reviewed by the site management team and monthly reported. The reduction of complaints and complaint costs is a topical subject.

Assessed:

Overview of complaints 2015. Regarding to food safety, foreign body (plastic and metal) is the major part



of the complaints.

The Management focuses on reducing foreign body complaints. Actions are taken such as:

- the introducing of the hurdle system to improve daily communication with employees about quality and safety issues
- projects eg the A3 improvement project, reducing the use of blue plastic in production

In general appropriate actions to clients, internal organisation and / or suppliers seen.

No complaints from the authorities.

### 3.11 Management of incidents, product withdrawal and product recall

There is a company's crisis and recall management procedure (P-FOOD-10014) 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 recall procedure is tested 1x / year.

### 3.12 Customer focus and communication

Most articles are Private Label articles. This means that products are developed on the basis of customer specifications. So products are developed in close consultation with the customer. After testing the customer gets an advice for e.g. BB period and important quality and food safety issues. PD and QA are involved in these processes. Further personnel are instructed were necessary. Were applicable suppliers are contacted.

## 4. Site standards

### 4.1 External standards

This location has been suitable maintained and well equipped; makes in general a logical and safe way of processing possible; f.e. intake, storage, processing (raw material preparation, mixing, packing), storage and dispatch. The factory is situated in an industrial area, well maintained external areas.

No local activities that would risk product contamination could be recognized. External areas to production/ office buildings are well maintained. A paved surface is built around the building.

### 4.2 Security

Site boundaries well defined and 24 hour security in place with security card for employees on all potential entry points to the plant. The site is fully fenced in and has camera surveillance. The company is registered by the Food and Consumer Product Safety Authority (official approval NL 61 EG).

Minor NC 4.2 concerning assessment and verification on: site security arrangements, control measures to prevent malicious contamination and food fraud

### 4.3 Layout, product flow and segregation

The processing and packaging parts of the production are in general well designed to prevent contamination risk. Based upon a risk assessment all zones are "low risk" or "high care". Transfer points have been considered as part of the HACCP study and do not represent a potential threat to product safety. Premises allow sufficient working space and capacity to work in a proper way. There



were no temporary constructions.

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

The fabric and internal condition of the site was suitable and satisfactory for the process. Walls, ceilings and floors were mostly suitable. No direct product contamination seen. The 'high-care' area does contain several departments of which only two departments are equipped with a positive air pressure ventilation system.

#### 4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good degree.

The water used for cleaning and process is mains water ( ) Quality of water is monitored in an adequate way.

The air is controlled by regular filter inspections and changes. All gases used on site in contact with food or packaging are bought from approved suppliers and certified as being food safe.

Compressed air is used for equipment and to clean. Oil used in the system is food approved (seen specification : 02-05-2013

Steam comes in direct contact with products. The steam is supplied by Vion. One food grade additive is used in the steam (seen specification oxygen binder 01-02-2010 & 21-10-2015 confirmation from Vion this is still the actual version).

#### 4.6 Equipment

All equipment was seen as suitably designed and used to minimise potential contamination. The used equipment is suitable for its purpose. No evidence is found during the inspection on contamination of the product. Use of well-known brands of equipment for food applications. New equipment is purchased as required and specified.

#### 4.7 Maintenance

Equipment is maintained and on the planned maintenance system. 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. Assessed:

Machine overview Encebe; "Storing en werkzaamheden lijst 2015"

"Smeerschema" wk 41 t/m 44 2015

Specifications: Grease (used at : stopmachine); foodgrade dd 02-05-2013, Grease (used at the Clipper ); foodgrade dd 02-05-2013.

#### 4.8 Staff facilities

There were suitable changing rooms for staff. The rooms are sited to production. Separation in work wear and personal clothing/items is arranged. Staff facilities are designed and operated to minimise the risk of contamination. Staff facilities are suitable for the operation. Suitable hand washing facilities with suitable warm water, liquid soap, single use towels, taps with hand-free operation and clear advisory sign to prompt hand-washing.

High-care area, personnel entered area via a specially designated changing facility with arrangements to



ensure that protective clothing will not be contaminated before entry to the high-care area. The changing complies with the requirements. Well-designed canteen separated smoking area. Well controlled facilities. No external catering.

#### 4.9 Chemical and physical product contamination control

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

In production areas regular foreign body checks are done on products and semi-finished products ("conformiteits controles" seen various records of such checks during the audit).

##### 4.9.1 Chemical control

Control over cleaning chemicals on site was demonstrated. Separate storage facility for cleaning chemicals in place. 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. The metal detectors are checked during production by the quality employee. Procedures are in place in case the metal detector does not detect the test bullet. Metal hazard is controlled by metal checks too (machine / knife intactness) in relation to the hazard analysis. Registration and corrective actions could be demonstrated. A knife handling policy is in place. During the audit the correct working of several metal detectors was checked.

##### 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. Daily hygiene audits by production department (pre-SSOP and SSOP) include glass / hard plastic. Glass / hard plastic audits regularly carried out by department management (4 x / year).

Assessed: Glass/Hard plastic audit d.d. 20-01-2014, 29-04-2014 and 08-10-2014; OK

##### 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, but clearly used at the end of the packing line; no risks to product as all products are fully packed.

#### 4.10 Foreign-body detection and removal equipment

##### 4.10.1 Foreign-body detection and removal equipment

Metal detection in processes.

##### 4.10.2 Filters and sieves

Not applied.



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#### 4.10.3 Metal detectors and X-ray equipment

Metal detection in processes.

#### 4.10.4 Magnets

Not applied.

#### 4.10.5 Optical sorting equipment

Not applied.

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

Cans are checked at receipt.

#### 4.11 Housekeeping and hygiene

Cleaning is done by subcontractor in the evening / at night when production has stopped. 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) executed on demand. Socks controlled by maintenance department. The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP). Swabs for pathogenic bacteria like Listeria are taken. Assessed:

Listeria 2015 R&D Agar results 2015 (1 positive, handled well) OK, "Pre SSOP overzicht 2015" score OK and "SSOP overzicht 2015" score OK

#### 4.11.7 Cleaning in place (CIP)

Not applied.

#### 4.12 Waste / waste disposal

A set of types of waste are defined. Correct collection and identification was demonstrated. Legal handling of categorised meat is collected by a licensed company or pet food application.

#### 4.13 Management of surplus food and products for animal feed

Cat 3 material is held separately and cooled. Legal handling of categorised meat is collected by a licensed company for pet food application.

#### 4.14 Pest Control

Contracted (central) for rodents (rats and mice) and insects (cockroaches and flying insects); frequency of control is 8 x / year; maintenance of EFK is 1 x / year. And assessment on the Pest control system and a Pest risk inventory 1x / year (Frequency of the in-depth pest control survey is risk based and accepted). All documentation is present in the contract map of (digital). Up to date site plans (are available to show the location of rodent baits, mouse traps, crawling and flying insect control units. Constructional action points are solved. An effective control programme could be shown.



Assessed: Visit reports 11-11-2015 no remarks, 15-07-2015 9 actions follow up was demonstrated.

#### 4.15 Storage facilities

Internal storage in separated cold stores and freezer. Control of temperatures was established including temperature alarm settings. Finished products are transported to a distribution centre (Distrifresh). General handling procedure and temperature control is applicable during storage and loading of raw materials and products. No outside storage applicable.

Minor NC 4.15 concerning pallets with meat that are not adequately protected against contamination see NC table.

#### 4.16 Dispatch and transport

Dispatch and release of products is based upon general handling procedures. Checks are recorded. Temperature control is applicable during storage, loading and transport of the products. Product is loaded in covered bays. All transport and storage is subcontracted following P-NLFOOD-10038. VION Food (central office) is contract owner. The content of the contract complies with the requirements. VION reviews the performance of these transport companies ( eg ).

### 5. Product control

#### 5.1 Product design/development

Product- or process development is part of the QMS (MDM). Documented product design and development procedure exists (P-NCB-NL-10122). A development / validation protocol is available. Claims made about organic status / GMO / Good Farming Star. Procedures and working instructions are available and in practice correct implemented to comply with the claim(s) standard. No remarks. The MDM system guarantees that all relevant departments as QA, production etc. are involved where required in R&D projects.

Allergen policy is part of the product development process and changes are discussed in the HACCP team. Assessed:

- MDM system ", " new introduced product
- Specification ", " 26-10-2015

#### 5.2 Product labelling

The product labels are defined by R&D in cooperation with Vion group and private label owners where applicable. The EU 1169 has been implemented.

#### 5.3 Management of allergens

A general production method for handling specific materials like allergens is applied. Risk assessment of allergen cross contamination has been considered for products under the scope. Identification and segregation preventive measures in place. Proper precautions of segregation are mostly taken to prevent cross contamination. Allergen containing ingredients are listed: mustard, celery, gluten, milk and soya. A list has been made in which slicing sequence is normally defined. Additional cleaning required between certain slicing steps. Rework is in accordance with the rework procedure and ensures traceability.





#### 5.4 Product authenticity, claims and chain of custody

Logo's and claims applicable about organic status / GMO / Good Farming Star. Identity preservation is applicable, e.g. for organic products "SKAL" as demonstrated during the visit. Measures to ensure identity of organic products are in place, e.g. green label. Organisation adapted also the chain of custody principals and is approved for "Beter leven keurmerk".

#### 5.5 Product packaging

Primary packaging materials are appropriate for the intended use and stored under conditions to minimise the risk of contamination and deterioration. Packaging is segregated from raw materials and finished products. Return of packaging materials towards storage area does not take place. Coloured in liners are applied depending on the content.

#### 5.6 Product inspection and laboratory testing

##### 5.6.1 Product inspection and testing

A sample scheme is set up as part of a microbiological monitoring program for product testing at production date and at end of shelf life conforms to Regulation 2073/2005/EC. The frequency of monitoring depends on the risk and the product group.

- Pasteurized and packed products: every 4 weeks 3 microbiological analyses;
- Pasteurized and sliced products: 1 x / week 5 microbiological analyses;
- Fermented products: 1 x / week 5 microbiological analyses.

Results of TPC and pathogens are analysed and reported on a monthly basis (periodical report). Trend graphs are applied. Raw materials are checked visually and on temperature at receipt.

Assessed: "Trend analyse Microbiologie 2015"

Product (organoleptic) test is conducted after each production batch.

##### 5.6.2 Laboratory testing

All analyses are subcontracted to an accredited laboratory operating in accordance with ISO 17025:

#### 5.7 Product release

Finished product is fit for delivery unless it is in blockade. Only authorised personnel are allowed to release products. Product release is done by the QA Manager or General Manager.

### 6. Process control

#### 6.1 Control of operations



The site clearly demonstrated a good control of operations. Process conditions and methods are well looked at and revalidated. Systematic monitoring is demonstrated. During production the correct application of CCP's is monitored and verified on a day to day basis. All processes are validated with records maintained, to demonstrate that the process is capable of producing safe, legal and quality products. Process control is based upon the HACCP study, legal and customer requirements. Documented start up checks are applied. All CCP check's where demonstrated during the audit. Essential equipment for CCP control and the weighing devices were calibrated.

#### 6.2 Labelling and pack control

During the production only the label involved is present on the line. (No consumer label is added).

#### 6.3 Quantity, weight, volume and number control

All products are sold by weight. Metrology controls the balances for commercial purpose. The devices are tested internally on a daily basis. No issues identified. Calibration of the scales is demonstrable using standard weights. Records were available.

#### 6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated. Critical measuring equipment are thermometers (CCP related) and weighing scales. Calibration with 2-monthly frequency (thermometers CCP), 6-monthly frequency (other thermometers) or yearly frequency (balances, PT 100 probes) is adequate according to the calibration records. No adjustments are possible. Assessed:

- Calibration planning 2015 (incl. results Thermometers CCP 1/2, OK)
- Reference thermometer QA Calibration certificate dd 27-05-2015
- Metal detector Calibration certificate dd 08-06-2015
- Metal detectors (6x) Calibration certificates dd 13-02-2015
- pH weekly with reference fluids. (records WK 44 – 47 OK)
- Checkweigher Calibration certificate 26-10-2015 OK

### 7. Personnel

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

There is evidence of introduction training for new starters, temporary workers and contractors. Clear competency training (on food safety and quality) had taken place for the staff sampled. Training effectiveness is monitored (exam). Checked for several employees if they are trained for their job, working with a CCP and personal hygiene.

Assessed: Files Temporary worker , OK : "vragenlijst voedselveiligheid en hygiene" & exam OK

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

The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel prior to commencing work. These hygiene rules are effectively enforced. Well detailed hygiene rules are documented and signed by employees. Checked for temporary



workers (1x) and own employees (3x). Smoking is only allowed at a separate room at the canteen. Hand cleaning is provided at the entrance of the production and special for packing employees at the entrance of the clean room. Medicine use is set at the hygiene rules.

#### 7.3 Medical screening

The medical screening is part of the intake of new employees and part of the instructions to visitors. The site makes all visitors, new starters and contractors aware of the need to report infectious disease via the hygiene protocol. Health questionnaire is applicable for all visitors and contractors. Persons who are suffering from a relevant infectious disease are not allowed to enter the production facilities. Medicine use is set at the hygiene rules.

#### 7.4 Protective clothing: employees or visitors to production areas

Company issued protective clothing (inclusive work shoes) is given to all staff and visitors. Protective clothing includes white trousers, jackets and rubber boots / shoes. Balaclava hairnets with surgical masks are applied, all hair is enclosed. Mob hats are single use. Good adherence to the dress code observed during the site evaluation. No top coat during breaks (eating, drinking and / or smoking). Clean and dirty clothes stored separately. Sufficient amounts are available at all times. Employees can change daily. The external laundry ( ) complies with the requirements of the Global Standard for Food Safety. Cleaning of work wear checked by means of agar.

## Traded Goods Module

### 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

