



Audit Report

Global Standard for Food Safety Issue 7: July 2015

n Audit Súmmary			Salville Co.
Company name	VION Food Group	BRC Site Code	1598805
Site name	VION Enschede BV		
Scope of audit	Deboning, cutting to specific of beef in bulk (chilled, dolar (chilled, vacuum).	ation of beef. Slicing, in s and bags in crates) a	jecting, curing and packing nd in consumer packaging
Exclusions from scope	none		
Justification for exclusion	N/A		
Audit Finish Date	2015-11-11		
Re-audit due date	2016-11-11		

/olUntary modules	included	
Modules	Result	Details
Choose a module	Choose an item	
Choose a module	Choose an item	

2 Audit Resul	e E						
Audit result	Cert	ificated	Audit grad	de	AA	Audit type	Announced
Previous audit o	grade	Α		Previous au	dit date	2014-11-	13

	Fundamental	0
Number of non-conformities	Critical	0
	Major	0
	Minor	3

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3.CompanyDe	etails	Will the	
Address	Het Lenfert 74 7547 SP Enschede		
Country	The Netherlands	Site Telephone Number	+31 53 486 4444
Commercial representative Name		Email	@vionfood.com
Technical representative Name	i	Email	@vionfood.nl

4. Company Profile				
Plant size <10K (metres square)		No. of employees	No. of HACCP plans	1-3
Subcontracted processes	No			
Other certificates held	SKAL/C	Organic		
Regions exported to	Choose Choose	e a region		
Company registration number	EG 305	NL		
Major changes since last BRC audit		g is rearranged, two re earranged spaces for		
Company Description				

VION Enschede B.V. is **a** site of VION Food Group in which beef is manufactured for retail and industry. VION Enschede is bought summer 2010 and 30 August 2010 the production is started. From employees, about employees are working via subcontractors mainly in production.

Main activity is the deboning and packing of fresh beef for retail organisations and meat industry. There are 3 type of products (so 3 HACCP studies): slice (which can be injected), minced meat and bulk. There are cutting lines and packaging lines and a fresh meat line. Company focus is on retail customers and a process change is validated to alter the process more efficient and to widen the packing possibilities.

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4. Company Profile

Retailers are the main customers (Western Europe with a focus on North Europe: Sweden and Denmark), but also meat industry in Western Europe mainly The Netherlands.

The production is organized from till) in one shift. All finished products do need a heating step by the consumer or customer. Beef to be used for not heated products is released only on positive release.

The production building and equipment is dated October 2009. Facility buildings are older and have no direct entrance to the production building.

There is no subcontracted process and there are no exclusions from scope.

The audit was not performed over 2 non consecutive day because of personal reasons in the auditor agenda. The Tuesday was not available so the Monday and Wednesday were chosen.

5 ProducteCharacteris	cs		THE STATE OF STATE		- 100
Product categories		03 - Raw po Category Category Category	repared products (meat and	vegetarian)	
Finished product safety i	ationale	Chilling (temperature <7°C), salting, vacuum packing			
High care No	High risk	No Ambient high care No		No	
Justification for area		No ready to	eat product		
Allergens handled on site		None Choose an a	llergen Ilergen Ilergen Ilergen Ilergen Ilergen Ilergen Ilergen Ilergen Ilergen Ilergen		
Product claims made e.g organic	IP,	Organic			
Product recalls in last 12	Months	No			
Products in production at of the audit	the time	beef quarter	s, labelled beef, sliced beef		

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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	none		
Next audit type selected	Announced		

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
I (start date)	2015-11-09	08.30	16.30
2	2015-11-11	08.30	16.30

	Auditor (s) number(s)	Names and roles of others
Auditor Number		
Second Auditor Number	N/A	

Present at audit		Balling .		
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
Director Operations	x			X
Quality Manager	Х	Х	Х	X
Bedrijfsleider Uitbenen	X	Х		X
Bedrijfsleider Retail	Х	X	X	×
HRM	Х		X	X
Finance	Х		х	х

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Sales	X		Х	х
foreman reception carcasses		x		
, Foreman bulk packing		х		
, Foreman dispatch		X		
Foreman Maintenance			X	
forewoman packing retail		X		

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Non-Conformity Summary Sheet

. S		ilicaloginaloranon Conformities Against Fundamental Requirements	Clause Details of non-conformity Critical or Major? Anticipated re-audit date			
-----	--	--	---	--	--	--

星	Sufficea		
6	lo. Clause	Details of non-conformity	Anticipated re-audit date

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Major	jor				A CONTRACTOR OF THE PARTY OF TH		
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	Reviewed by

No.	Clause	Detalls of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence document, visit/other	provided photograph,	Date	Reviewed
-	1.1.2	KPI's are defined and monitoring monthly and quarterly reported in MT meetings. Some KPI's do show planned figures. Actual figures are absent. For KPI Failure costs and for KPI Microbiology (TPC) no actual figures are reported	The failure costs have been analyzed and monitored for Q3 and the actual figures for Microbiology are reported monthly now from beginning 2015 onwarts.	Absence of some actual KPI monitoring was visible due to time constraints and not given time to calculate (failure cost). Figures for microbiology were available but not plotted. Only "less then" was reported. Action: The figures for KPI failure costs is analyzed for Q3 and reported for P7, P8 and P9 and will be monitored monthly.	Seen Overview KPI Enschede 2015 untill P9 (P1 – P9)		2015-	FULLY

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	FULLY	CLOSED to be verified
	2015- 11-30	2015- 11-30
	Seen Picture of drain and v3 of F- ENS-NL- 10007	Seen P-ENS-NL- 10027 v2 dd. 20-11- 2015 and seen verification of archiving first and last label of each batch.
For KP! Microbiology the actual figures are reported from P1 till P9 in the KP! report now. This KP! will be monitored and reported monthly now.	Drainage system in the cell packing material was dirty because it was not in the cleaning schedule as this part is recently taken into use. Action: The drainage system is now part of the pre-ssop inspection (F-ENS-NL-10007) responsible staff is instructed (attachment 1)	Written instruction was incomplete. Action: Written instruction is updated document (P-ENS-NL-10027 v2 dd. 20-11-2015) Staff is instructed
	Drainage system is cleaned and it will be checked daily during pre-ssop on document F-ENS-NL-10007 v3 dd 16-11-2015	Written instruction is updated in a document (P-ENS-NL-10027 v2 dd. 20-11-2015)
	Drainage system in the storage cell for empty packing (crates, dolavs, boxes) is not clean. Sewer is full and contains dirt.	Instructions are in place to control correct packaging and labelling in the slicing department. Communication between sales and production is effective. A documented procedure is not in place and the current instruction is not verifiable. Documented checks are on beginning of production batches. It is not demonstrated that these checks cover the whole production run.
	4.11.1	6.2.3
	7	ო

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Voluntary Modules Non-Conformity Summary Sheet

	Details of non-conformity		
	Details of no		
eal	No. Clause		
Critical	No.		

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Reviewed by Date reviewed Evidence provided document, photograph, visitother Lloyd's Register LRQA Proposed preventive action plan (based on root cause analysis) Correction Details of non-conformity Clause

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No.	No. Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visitother	Date reviewed	Revlewed

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Detailed Audit Report

Defails of monage	licable clauses with justification
প্রিলাইর ন্র্রোপ্রাক্ত	ીપસંત્રીભિત્રાભા
4.3.5	Only low risk areas
4.3.6	Only low risk areas
4.3.7	Only low risk areas
4.4.13	Only low risk areas
4.8.4	Only low risk areas
4.8.5	Only low risk areas
4.9.4	Products packed in flexible plastic
4.9.5	Products packed in flexible plastic
4.10.2	No filters and sieves applied
4.10.4	No magnets applied
4.10.5	No optical sorting equipment applied
4.10.6	No rigid containers are applied
4.11.7	No CIP applied
4.15.5	No outside storage

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Policy on "Beleid & Doelstellingen is signed on 19-02-2015. The company has a management team which meets regularly. Formal communication meetings are held at several levels within the organisation; monthly MT, daily morning meetings. Minutes of department meetings are kept. Seen KPI overview discussed in monthly meeting minutes.

The management review is kept at a yearly base July 2014 – June 2015 signed 06-10-2015. The reassessment together with the management review contains the verification of the HACCP system,

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complaints, the review of the objectives, training activities, and the preventive and corrective actions.

The management review contains also evidence for continuous improvement (e.g. reduction of complaints).

Non-conformities identified at the previous BRC6 audit against the Global Standard for Food Safety are effectively corrected: The not fully closed minors are fully closed now.

Minor nc 1: KPI's are defined and monitoring monthly and quarterly reported in MT meetings. Some KPI's do show planned figures. Actual figures are absent. For KPI Failure costs and for KPI Microbiology (TPC) no actual figures are reported

1.2 Organisational structure, responsibilities and management authority

Organisation chart is dated sept 2014. A second production leader is installed to manage the growth of personnel and activities.

Outline of management structure: Director Operations and purchase, 2 Production Managers and 6 foremen on deboning, packing, expedition and operators, Maintenance foreman, QA manager also R&D, Sales manager, Finance manager (also IT) and HR Manager. Deputised responsibilities are mentioned. The management team is formed by Director and managers.

2 The Food Safety Plan - HACCP

The HACCP system is implemented and maintained. A VION central PRP and CCP plan is the basis for the local HACCP plan.

Each identified hazard was reviewed and given a risk rating 1 to 9 (severity and likeliness of a hazard occurring = 3 x 3 matrix). A decision tree is used. A set of flow diagrams is part of the HACCP documentation, the steps are: Process steps in sequence: Receipt (CCP temperature), storage, cutting, metal detection, injecting (option) / slicing, packing, storage and despatch (CCP temperature). The processes were shown on a flow diagram for each process. Generic processes for example raw material receipt and storage were covered on separate flow diagrams. Checked during the audit for receiving, deboning and packing. Also a minced meat line is part of the production (not in operation during the audit). This is the production of minced meat with 2 mincing machines, a portioniser and vacuum packers.

At this moment the following CCP apply with the critical limits: Temperature incoming meat/organs: Temperature of outgoing meat/organs. Meat can come in as hanging meat, or in dolavs which is called CCP1, temperature returned products is called CCP2. CCP 3 is outgoing product. Critical temperature limits are: Organ meats: <3 °C, vacuumed organs: <2 °C; Meat: <7 °C), vacuumed meat: <6 °C. CCP monitoring has been defined and documented, records of CCP's were checked during this audit. The CCP's are checked every receiving of meat at 5 places.

Also 20 CP's apply on various prerequisite and operational processes.

The local HACCP plan is reassessed on 19-08-2015. It is made with input of the central HACCP plan. The HACCP system is developed by a multi-disciplinary team.

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3. Food safety and quality management system

3.1 Food safety and quality manual

The documented system is defined and available via

All key functions have direct access.

3.2 Decumentation control

Procedures have names by which they can be recognised. P-VION (apply to all VION plants); P-FOOD (apply to all VION Food plants); P-NLFOOD (apply to all dutch VION plants); P-ENS-NL (applies to VION Enschede).

Work instructions for employees are available in 4 languages.

3.3 Record completion and maintenance

Records of the following controls are verified as part of the vertical audit: pre-SSOP F-ENS-NL-10005 dd 7-11-2014; 10006 dd 16-11-2010; 10007 dd 05-01-2015 (to check the PRP program), SSOP F-ENS-NL-1009 dd 16-11-2010; 10010 dd 11-11-2010; 10011 dd 01-04-2014; 10014 dd 27-11-2014. CCP checks (temperature) and control metal

3.4 internal audit

Once a year the production site in Enschede and involved departments are audited announced and once a year unannounced. There is a schedule for the internal audits according to procedure 'interne audits' (P-VION-10011) carried out by trained auditors of other VION companies. The audit frequencie is based on risk of activity to the business, the operation and the customers. The unannounced audit is introduced last year because the CoC audits are also partly unannounced.

A hard copy of internal audit reports is maintained. Conformities and non conformities are listed with corrective actions. Last announced audits was done by on 7+8-05-2015 announced and 3-11-2015 unannounced by In may 8 minors were reported, all transferred to a action list and all closed out. A checklist with 3 annexes is used corresponding to BRC, CoC and nowa requirements.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

Purchasing and supplier approval is at VION Food Nederland on all goods except carcasses (packaging, services, pest contractor, cleaning, transport, etc). All (other) suppliers are approved by the central VION office and entered into the IT system before they can be used. Carcass suppliers are audited regularly by VION (), and corrective actions are recorded. Seen records on in the vertical audit. Of all carcasses it is known were they are born, bread and slaughtered.

No raw material is bought from agents / brokers.

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3.5.2 Raw material and packaging acceptance and monitoring procedures

At the warehouse dept. incoming raw materials, packaging materials and their specifications are checked visual and temperature (CCP). Records are made. Microbiological parameters are analysed by external lab (). Also supplier audits are done, generally audits are arranged VION central. Suppliers are monitored onsite by

- Every hook with beef is visual checked at delivery and recorded on F-ENS-NL-10018 dd 131-3-2014 and temperature is measured according F-ENS-NL-10003)
- (Morning) Inspection regarding outsourced cleaning on forms regarding pre-SSOP's
 Relevant data is available, checked by vertical audit for supplier receipt on 22-05-2015.

2.5.3 Management of suppliers of services

All service suppliers are managed by VION Food NI in Boxtel.

3.5.4 Management of oursourced processing and packing

Transport, storage and plate-freezing is outsourced to subcontracted processors which are certified to GFSI standards. Eg in (certificate BRC Food 24/08/2016) and in BRC Food 19/12/2015).

3.5 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished product are defined and managed by the involved departments. Eg Maintenance for cleaning agents, lubricants and other technical aids. Based upon sampling as part of the vertical audit the specifications of packaging material were available. Seen specification dd 23-09-2013 of

with BRC IoP certificate valid until 01-06-2016.

Specifications of finished goods are kept by the sales department and available in dedicated parts of IT, also visible to production.

3.7 Conrective and preventive artions

VOS 2.0 (Vion Operating System is used to manage corrective and preventive actions. Also results of controls and audits are scheduled and can by incorporated in the mmm's, huddles, TIER meetings. A major nc in any audit leads to an "A3-verbeterplan" meaning a controlled methods of managing non conformities.

3.3 Control of non-conforming product

The procedure for non conforming product is checked during the audit and records any incidents of non conformity. If meat falls on the floor, special educated operators can tide up this meat on a special table according P-ENS-NL-10004. Returned products are handled according P-ENS-NL-10008. All non conforming product is categorised to CAT1. Blocked products are accompanied by form F-ENS-NL-10021.

3.9 Thereenoillay

Tracetest was done on 29-10-2015 on 75,5 kg Beef (dike Lende) sliced on 22-10-2015 and slaughtered by on 20-10-2015 (batch 120627). All relevant information was retrieved and procedure P-ENS-NL-10017 was evaluated.

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The tracetest during the audit was on batch 118390 (all raw material supplied by on 22-05-2015. Mass balance was correct and CCP records available. Records presented were: invoices of raw material; records of incoming goods control (CCP1); stock lists; productions schedules and efficiencies. Also other records concerning training, prerequisite programs and IT.

3.40 Complaint handline

Complaints are received from local sales offices and from headquarters and managed in a IT system called . (No direct contact with the client.) All complaints which are considered to be attributable to the process/ product are communicated and investigated by the quality manager (categories: safety; labelling; processing/cut). All complaints are trended and reviewed centrally per VION plant). Complaints and retours together are expressed in €/1.000 ton or €/amount of orders and discussed quarterly as a KPI's in MT. (The KPI on failure costs was not correctly counted, see minor in 1.1)

3.11 Management of incidents, product withdrawal and product recall

There is a general recall procedure at VION concern (P-VION-10015 Crisis management) which covers the process and which is applicable for all operations. Also P-ENS-NL-10017 applies. A combined traceability/ recall test is reported on 29-10-2015. There were no withdrawals or recalls during the past year.

3.12 Gustomer focus and communication

VION Enschede has no direct contact with customers, all via sales departments of VION HQ or VION country sales. Communication on specification is weekly on prices to be printed on products.

4. Site stemperor

441 External Standards

The site has been designed and constructed in 2009 for its activities at an industrial area. There are no local activities that are expected to have an adverse effect. The Maintenance department and other staff offices are in a separate building. Storage of packaging materials is the previous slaughterhouse (an older part of the building which was not in use for some years). A alteration was done in 2014 to expand the storage volume on incoming carcasses for better canalisation. And in 2015 to expand on cold storage so dispatch activities are more onsite.

42 Security

Site boundaries well defined and security (') in place with check for visitors. Separate storage takes place for cleaning chemicals, lubricants and waste. Two entrances for pedestrians and one for vehicles.

4.3 Layout, product flow and segregation

The production and storage zones have been defined and based upon a risk assessment all zones are "Low risk areas" and "enclosed product areas". Personnel flows, material flows, services and equipment are placed such as to minimise the risk of product contamination. No high risk or high care or ambient high care production.

All produced products do need a heating step before consumption. (except beef for a client who produces filet americain; this beef is on a positive release procedure.)

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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 processes. Walls, ceilings and floors were generally suitable. Storage of packaging materials and maintenance material is separated from production. Because the new dispatch cell is opened another cell is dedicated for packaging materials (plastic), crates, boxes, dolavs.

4.5 Utilities - water, ice, air and other gases

All utilities for water, ice and heating devices (cutting department) are within the maintenance system. Water quality of the mains is monitored by half yearly water analysis. A water distribution plan is available, this is in computer software which also regulates the temperature. Machinery appears to be in a good state of maintenance. No steam or ice (except frozen CO2). The company monitors on presence of Legionella and other.

Compressed air is mainiained by an external partner (). Change over because of headquarter reallocation. Filters for air are changed by maintenance (an indicator is placed in the filter).

4.6 Equipment

Equipment was seen as suitably designed and used to minimise potential contamination.

Relevant documents were available at the technical department, checked filter approval for filters used by

Certified by on product certification Class 2. Seen DoC of new dd

26-10-2015.

47 Matintenance

Preventive maintenance system is in place in excel with tabs per equipment section. Monthly monitoring and recording. Also monitoring on temperature of cooling cells by lowering set point and triggering an alarm on 08-10-2014. Daily start up checks are recorded daily on F-ENS-NL-10033 by maintenance engineers on all departments. Also is daily checked if all TD tools are complete, clean and not damaged. Calibration of the temperature equipment of the cooling cellars could be demonstrated.

4.8 Staff facilities

There is a well arranged area for staff facility. Outdoor clothing and shoes are stored separately from work wear. For man two separate rooms and for woman one room is available. Every person has 2 lockers. Rest room and catering facilities are provided for staff. Before using the cantine relevant clothing has to be left in the changing room.

The production and storage zones have been defined and based upon a risk assessment all zones are "enclosed" or "Low risk" areas because all finished products do need a heating step before consumption. Hand-washing facilities (with hand-free soap tap operation and air dryers) is provided at entry point to production areas. Before entering production areas sole washing and hand disinfecting equipment is installed.

Smoking is only allowed in a separated area.

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4.9 Chamical and physical product contamination control

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

Pre SSOP and SSOP instructions are in place to control contamination.

4.9.1 Ghamieal control

Control of chemicals on site is organized by separate (locked) storage facilities for e.g. cleaning chemicals, nitrate and nitrite and lubricating oil.

4.9.2 Metal control

Knifes are provided in sets. In the SSOP there is signed that no knifes are missing. Visual checks on knives and needle breakage is done at start up. (Pre SSOP)

493 Ciars, bride paste, ceremies and striler mercials

Quarterly glass audits do take place on F-ENS-NL-10031. Daily SSOP records seen in the vertical traceability test of and seen on de audit date on each visited department. Seen registers of 14-10-2015, 26-8-2015 and 20-5-2015.

4.9.4 Products percked into glass or other brittle containers

No application of glass or brittle packaging materials.

4.9.5 Wood

No wood is allowed at the production departments, were open product is present. Only at the end of the packing equipment wooden pallets are allowed in the packing department as well as carton layers and boxes.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body effection and removal equipment

On detection of foreign bodies 4 metal detectors are in place, no other devices.

4.10.2 Filtens and slaves

na

4.40.3 Metal detectors and X-ray equipment

Metal is controlled as a CCP and recorded on F-ENS-NL-10023. Based upon risk analysis one metal detector device is placed in the cutting department, one in the sorting and labelling department. After these departments meat can be injected and / or sliced and packed, and there are also two metal detector devices in the packing department.

Metal detection is arranged as a system with an alarm and a belt stop at the production lines. Tests are done with 3 types testing rods in the cutting department: Fe) mm; Non FE 1 mm; RVS 316 / mm, and in the packing department: Fe mm; Non FE mm; RVS 316 mm. Testing is every 3 hours and also at start and the end of the production day. Regular testing is demonstrated.

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14 6	(0.4)	11	Fair	Intel	8

na

4.10.5 Optical sorting equipment

na

4.10.6 Container cleanfiness - glass jars, cans and other rigid containers

na

4.11 Housekeeping and hygiene

production (F-ENS-NL-10036)

A cleaning program dd 30-7-2015 has been agreed with a third party () and covers equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) assessed also. These detail the chemicals to use, precautions to take and method of cleaning. Used detergents: cleaning is in place once a week to avoid lime scale. 9 stages are recognised in cleaning: precleaning, foam cleaning, periodical cleaning, disinfection, periodical disinfection, rinsing, manual cleaning, disassemble, assemble. Daily end of production checklists are recorded to communicate with

Daily start up checks (pre SSOP's) demonstrate visual and agar measurements.

An internal facility team supports handling of waste and staff facilities (detergent, gloves, paper towels).

The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP) Swabs for CFU, pathogenic bacteria like Listeria and residue tests are taken regularly.

The dolars and crates are washed elsewhere (arranged by transporter and a circulation system to avoid cross contamination.

Minor nc 2: Drainage system in the storage cell for empty packing (crates, dolavs, boxes) is not clean. Sewer is full and contains dirt.

4.11.7 Cleaning in place (CIP)

There is no CIP.

4.12 Waste / waste disposal

Different types of waste are defined. Correct collection and identification was demonstrated. Legal handling of categorised meat (CAT1) is collected by a licensed company.

Other waste is collected on call separately by

4.48 Management of surplus food and products for animal feed

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There is no feed application of surplus food

4.14 Pest Control

is currently the pest contractor due to central agreements. In storage departments mice baits are placed (non tox) according to the plan as seen in the technical department. The plan is part of the online facility services of to manage and control the pest operation. The service is part of the yearly evaluation of suppliers. On 17-8-2015 there was an in depth survey and regulare visits were recorded on 9-11, 21-9 and 17-8-2015. All activities are monitored on and no open actions of longer time were seen. (Three open of recent visits.

4.15 Storage facilities

At the production facility several cooling areas have been defined. Control of temperatures is established (only cooled) including temperature alarm settings and controlled by an external service supplier. Alarms are monthly tested (every month another area), appr. 20 monitoring devices PT1000 are in use. Also meat can need some days for ripening, this is done at the location Enschede itself. A separate area of the building (the newest part of the building, former production area) is applied for the storage of

packaging and supporting materials. No outside storage.

4.16 Dispatch and transport

Dispatch and release of products is based upon temperature measurements at CCP level (meat temperature). There's a list of approved transport companies as prescribed by headquarters. All GFSI approved.

Trucks are inspected at hygiene and temperature before loading. Results of this inspection are recorded at the CP control forms.

5. Product control

5.1 Preciuet design/development

Process improvements are done based upon investment projects. The product development process is centrally organised within the VION Food organisation. New equipment to vacumise product is installed last march after validation also on shelf life. These machines replace two robots for packing.

There are no product claims other than organic. Also legislation 1760/2000 on "country of birth, breed and slaughter" applies.

5.2 Product labelling

Product is labelled in all stages of storing: at entrence per quarter, in crates, boxes, plastic, dolav. Instructions per labelling activity are in place.

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No allergens onsite.

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5.4 Product authenticity, claims and chain of custody

Segregation and correct identification is established for organic beef (SKAL certificate 687910 valid until 31-12-2015) although currently no organic beef is produced. Arrangement are made to comply with 1760/2000 to canalise "country of birth, breed and slaughter".

A vulnerability study is made by headquarters P-NLFood-10211 and transposed to the site. Carcasses bought from slaughtering houses are scaled as low risk suppliers. So all suppliers are scaled as low risk.

5.5 Product packaging

Packaging materials are stored separately from production materials and partly used packaging should be covered prior to returning to the storage area. Checked for films of ... (vertical audit). In use are plastic bags in several sizes and colour and for vacuuming and normal packing. Foils for and labels with and without glue layers.

5.6 Product inspection and laboratory/testing

5.6.1 Product inspection and testing

Product testing is with an anal-ray on fat content. Also pH, brine, and weight is inspected.

Sub contracted analyses (microbiological, chemical) are carried out by a laboratory operating in accordance with ISO 17025 (). There is no lab on site. The scheduled program of testing microbiology conform P-Food-10008 is demonstrated. This procedure complies with VO 2703.

5.6.2 Laboratory testing

Seen micro biological results on carcasses of the vertical audit on Aerobic mesophilic count, Enterobacteriaceae of Lende dd 22-05-2015. Also Listeria absence, salmonella absence in 5x 10 gr records seen of "Lende" dd 22-05-2015.

5.7 Product release

Product release is based upon product temperature measurements of the beef at 5 places (CCP) before loading.

For selected clients there is a positive release on microbiological values (Listeria absent).

6. Process control

6.1 Control of operations

Processes are reflected in the Process control plan. Process control is based upon the HACCP study, legal and customer requirements. Documented start up checks are applied as pre SSOP's and during the day SSOP are reported. Records checked on the audit day and of the vertical audit.

Organic should be produced at the start of the day but during the audit no organic beef was produced. Excell sheets are used to communicate and account for production values and identification (batches).

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6.2 Labelling and pack control

On several places product are labelled. The " labelling machine requires product knowledge as there products are identified and numbering is chosen. Also labelling for customer packaging on the slicing department were communication between production and sales is expressed in files and registations.

Minor nc 3: Instructions are in place to control correct packaging and labelling in the slicing department. Communication between sales and production is effective. A documented procedure is not in place and the current instruction is not verifiable. Documented checks are on beginning of production batches. It is not demonstrated that these checks cover the whole production run..

5.3 Quantity, weight, volume and number control

Quantity control is done via scales at the packing department and at expedition for bulk. Planned daily checks take place (F-ENS-NL-10009) as well as regular external measurements. All products are weighed.

E-weighing is done at the packing department. Licence is in use since 2704-2011 of NMI. Injection quantity is recorded on F-ENS-NL-10025 and 10026 to record machine adjustments and monitor weight increase. Injection was not in operation during the audit.

6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated.

Temperature devices (hand thermometers CCP and CP related) and scales (legal issue) were sampled and in found calibrated. Records checked: hand thermometers used at receiving calibrated and present on calibration form F-ENS-NL-10020. Cooling cellars are controlled with measure devices, which are adjusted external by

Daily all weigh equipment is checked with a weight (F-ENS-NL-10009). Yearly the balances are external calibrated by . Also metal detector is adjusted on 21-5-2015 by . All scales are listed in sheet "Apparatenoverzicht weegschalen" dd 19-1-2015.

7. Personnel

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

A HR manager and a HR officer are installed. HR department has its own Quality Manual, also centrally for VION locations. Training is a relevant part of the Manual. For temporary personnel, for flex, for key personnel. Records are maintained in personnel files and in an excel-sheet.

There is evidence of introduction training for new starters and refreshment training of employees. Competency training had taken place for the staff sampled (food safety and quality).

Records were sampled and available (checked for 15 people, able to conduct CCP receiving). A good overview of given training per person is in place. All employees do have to pass a test on the hygiene rules before starting the contract. This HACCP training (with a 15 min. test) is every two year repeated. Also a training is set up for the labelling of the "labelling device". For the HACCP-team a training is given on 22-10-2015.

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

Hygiene regulations: available in 4 languages (Dutch, German, English and Polish).

All personnel is instructed on the documented hygiene standard, prior to commencing work, this includes temporary personnel, visitors and contractors. The wearing of any jewellery isn't allowed. Instructions on changing before and after lunch breaks are clear.

Effectiveness of the hygiene procedures for personnel is part of the SSOP system.

7.3 Metheat sensening

Employees, visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Procedures are established for personnel to notify management of infectious conditions they may be suffering from or been in contact with.

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. The health and safety service physician signs declarations for each personnel under contract of VION Enschede. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

Personnel should report the use of medicine to their direct leader according the house rules in the contract.

7.4 Protective clothing: employees or visitors to production areas

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. Knifes and metal gloves are washed by the company at the entrance with hydrogen peroxide 35%.

Traded Goods Module

Scope

8.1 Approval and performance monitoring of manufacture/s/packers of traded food products

8.2 Specifications

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8.3 Product inspection and lab	oratory testing		
8.4 Product legality			
8.5 Traceability		Second Second	

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