



Audit Report

Global Standard for Food Safety Issue 7: July 2015

1 Audit Summary			
Company name	VION Food Group	BRC Site Code	1598805
Site name	VION Enschede B.V.		
Scope of audit	Deboning, cutting to specification of beef. Slicing, injecting, curing and packing of beef in bulk (chilled, dolavs and bags in crates) and in consumer packaging (chilled, vacuum).		
Exclusions from scope	none		
Justification for exclusion	N/A		
Audit Finish Date	2016-11-02		
Re-audit due date	2017-11-11		

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	AA	Audit type	Announced
Previous audit grade	AA	Previous audit date	2015-11-11		

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

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Report No. RQA1032600/0031

Auditor:



3. Company Details			
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		Email	@vionfood.com

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	Skal/Organic				
Regions exported to	Europe Choose a region Choose a region Choose a region Choose a region Choose a region				
Company registration number	EG 305 NL				
Major changes since last BRC audit	No major changes since last audit				



4. Company Profile

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 275 employees, about 225 employees are working (most 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.

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 6.00 till 15.00 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.

5. Product Characteristics

Product categories	03 - Raw prepared products (meat and vegetarian) Category Category Category Category Category					
Finished product safety rationale	Chilling (temperature <7°C), salting, vacuum packing					
High care	No	High risk	No	Ambient high care	No	
Justification for area	No ready to eat product					
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	Organic					



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5. Product Characteristics

Product recalls in last 12 Months

No

Products in production at the time of the audit

beef quarters, labelled beef, sliced beef

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 Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 start day	2016-11-01	9.00	17:00
2	2016-11-02	9.00	17:00

Auditor Number	Auditor (s) number(s)	Names and roles of others
		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
, Director Operations	X		X	
, Quality Manager	X	x	X	X
, QA			X	X
Bedrijfsleider Uitbenen	X	X		X
Bedrijfsleider Retail	X	X	X	X
, HRM			X	X
Finance	X			X

Present at audit				
	, Sales			X
	accountmanager		X	
	, Foreman reception carcasses	X		
	Foreman deboning	X		
	Foreman bulk packing (snipper)	X		
	Foreman dispatch	X		
	Expedition	X		
	Foreman Maintenance	X	X	
	Foreman packing retail	X		
	operator meat curing	X		
	packing operator	X		



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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

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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 provided document, photograph, visit/other	Date reviewed	Reviewed by
1	4.4.12	In the expedition area (receipt of unpacked carcasses) there are some condensation drops on the ceiling and pipes. (motivation Minor NC; during the audit no falling drops were seen. The	During ssop control extra check on condensation. If there is condensation it will take away immediately. Condensation is in procedure P-ENS-NL-10014	The ceiling is synthetic material without isolation. A new ceiling is to be planned with isolation. Updating cooling system and	Attachments: SSOP list and quotation to repair ceiling.	2016-11-22	Closed, subject for next visit



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2	4.13.3	ceiling was clean and free of moulds and dirt). Microbiological risk is low because products are heated for consumption).	Paper is taken away. Staff is instructed.	extra isolation..	Attachments: Instruction staff and photo blue crates.	2016-11-22	Closed, subject for next visit
3	4.14	In the deboning department there are dedicated blue crates for Cat. 3 materials. In a crate there are blue paper pieces in the Cat. 3 meat.	have done a extra investigation on 10-11-2016	The old slaughterhouse and some offices will be checked during each visit of	Attachment: Plan and inspection report by	2016-11-22	Closed, subject for next visit
4	6.3.1	Parts of the building (old slaughterhouse and some offices) are not is use anymore. According to (pest control supplier) there is a substantial risk this becomes a source of pest (report 2016-04-18). But no bait is placed and no other monitoring activities on pest are demonstrable for these areas in the building. For the E-weighting of consumer units (sliced beefparts) a not authorised (not legal), weighing scale () was in use during the audit. For the E weighting the scale ()	A new weighing scale with all regular certificates and authorizing is ordered at Responsible staff is instructed.	The new weighing scale will be part of the yearly calibration done by	Attachment: Order to	2016-11-22	Closed, subject for next visit



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		should be used which is marked and approved by Dutch authorities as suitable for trading purposes.					

Comments on non-conformities



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Voluntary Modules Non-Conformity Summary Sheet

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



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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
	NA						



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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
	NA						



Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company demonstrated an effective food safety management system, which is maintained effectively to meet legal, food safety and customer requirements. Process controls and product measures are handled properly. The system for continuous improvement and PDCA was demonstrable; all procedures are linked to this system and actions are well followed up by root cause analysis and corrective actions (+ verification).

Policy on "Beleid & Doelstellingen signed 25-01-2016 seen. The company has a management team which meets regularly. Formal communication meetings are held at several levels within the organisation; MT 1x/4 weeks, Production/HACCP meetings 1x/2 weeks (Production, QA, HR, TD). Minutes of meetings are kept. Seen Production/HACCP minutes of meeting of 2016-10-17.

The management review is kept at a yearly base, seen evaluation over July 2015 – June 2016. The reassessment together with the management review contains the verification of the HACCP system including the required details like CCP evaluation, 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). Each quarter there is also a review on specific items such as complaints, microbiological results. Seen report Q2 2016.

Non-conformities identified at the previous BRC7 audit against the Global Standard for Food Safety are effectively corrected and did not reoccur.

1.2 Organisational structure, responsibilities and management authority

The organisation chart (2016-10-21) shows the organisations' structure and is supported by job profiles with responsibilities and authorities. Yearly appraisal meetings are held.

The management team is formed by Director and managers.

Details of non-applicable clauses with justification

Clause reference	Justification



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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. The HACCP system is developed by a multi-disciplinary team. The verification/ management review contains the HACCP verification (e.g. CCP's, audits, hygiene inspections, complaints, changes in legislation, etc.). HACCP team meeting is 4x / year. Seen minutes (incl review of process diagrams) last meeting 2016-09-19. HACCP team is well trained (seen Certificate HACCP update training for team leader 2016-05-31).

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 are shown on flow diagrams for each process. Checked during the audit for deboning and retail (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, temperature checks are done on 5 places for delivery of meat.

Also there are 20 specific control measures on various prerequisite and operational processes.

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 documented system is defined and available via

All key functions have direct access.

3.2 Documentation 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 are kept for 3 years (max shelf life is fresh 35 day's). Several records are checked, also as part of the vertical audit and during production, like Procedure Recall and Crisis management 2016-07-01, Procedure Document Management 2012-11-24, Internal audit form 2016-09-06).

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 frequency is based on risk of activity to the business, the operation and the customers.

A hard copy of internal audit reports is maintained. Conformities and non-conformities are listed with corrective actions. A last announced audit was done by (QA plant Boxtel), 30 + 31 August 2016. 4 Minor NC's were reported, follow up actions were demonstrable.

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 audit reports of 2015-06-10 and 2015-11-23. Of all carcasses it is known where they are born, bread and slaughtered. No raw material is bought from agents / brokers.

3.5.2 Raw material and packaging acceptance and monitoring procedures

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

Meat Suppliers are monitored onsite by; Every hook with beef is visual checked at delivery and recorded", temperature is measured. Seen registrations date 2016 august 24, at receipt of carcasses from Vion Tilburg in vertical audit.

3.5.3 Management of suppliers of services

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

Suppliers are monitored onsite by eg;

(Morning) Inspection regarding outsourced cleaning on forms regarding pre-SSOP's and trailer checks at dispatch, for transport suppliers. Relevant data is available, checked by vertical audit (art 54099 "Peperbiefstuk", production date 2016 august 24.

3.5.4 Management of outsourced processing and packing

Transport, storage and plate-freezing is outsourced to subcontracted processor which is certified to GFSI standard. (certificate BRC Food exp. 2017-08-24). Further transport is arranged by



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HQ.

3.6 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 (seen), lubricants (seen) and other technical aids. Specifications seen in vertical audit: Pepper by supplier , Pekelmix by supplier Specifications of finished goods are kept by the sales department and available in dedicated parts of IT, also visible to production (seen specification "biefstuk 200 g" 2013-11-19 in vertical audit)

3.7 Corrective and preventive actions

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

Details of corrective actions and closing out are kept including root cause analysis.
Checked for some complaints.

3.8 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 tidy up this meat on a special table. Returned products are handled according P-ENS-NL-10008.

Non-conforming products are categorised to CAT 1 or CAT 3. Blocked products are accompanied by form F-ENS-NL-10021.

3.9 Traceability

A traceability procedure is in place to operate the trace system:

All raw- and packaging materials, intermediate and finished products receive a unique lot code. At all stages of production, the materials and products are traceable via IT system. All individual product packs are identified with a production code (line - week - day - hour) and shelf date.

Trace test was based on article (54099 Peperbiefstuk - sliced beef) sliced on 2016-08-24. Beef was supplied by Vion Tilburg slaughter date 2016-08-23. All relevant information was retrieved. Specifications and receipt documentation of raw materials supplied by Vion Tilburg Carcasses, and was demonstrable.

Mass balance was correct and CCP records available.

Records presented were: invoices of raw material; records of incoming goods control and process control (incl CCP temperature checks and CP metal detection); stock lists; production schedules and efficiencies. Also other records concerning training and prerequisite (incl pre SSOP and SSOP) programs.

3.10 Complaint handling

Complaints are received from local sales offices and from headquarters and managed in a IT system called Fobis. (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). Complaints are investigated with regard to root cause analysis. Actions towards suppliers and internal processes could be demonstrated.

All complaints are trended and reviewed centrally per VION plant). Complaints and returns together are expressed in €/1.000 ton or €/amount of orders and discussed quarterly as a KPI's in MT.



In the first 6 months of 2016, there were 10 complaints about foreign material reported. There were no other complaints about food safety. There were no complaints from authorities.

3.11 Management of incidents, product withdrawal and product recall

There is a general recall procedure at VION concern (P-FOOD-10015 Crisis management) which covers the process and which is applicable for all operations. Also local Procedure Recall and Crisis management 2016-07-01 applies.

A combined traceability/ recall test is reported on 2016-10-28. There were no withdrawals or recalls during the past year.

3.12 Customer 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.

Details of non-applicable clauses with justification

Clause reference	Justification

4. Site standards

4.1 External standards

There are no potential risks associated with the site that may affect product safety or integrity. It is located at an industrial area. It is in good repair and well maintained.

4.2 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.)



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.

Minor NC: According condensation drops on the ceiling and pipes in the expedition area.

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 maintained by an external partner (). Seen maintenance report (including air filter change) 2016-05-09 and specification compressor oil “ ” 2013-07-15).

4.6 Equipment

In general all equipment was observed suitably designed and in good shape as to minimize potential product contamination. Relevant documents were available at the technical department, checked PVC belt (deboning department) specification 2016-01-22.

4.7 Maintenance

Preventive maintenance system is in place in excel with tabs per equipment section. Monthly monitoring and recording.

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.

There is a monitoring and registration system for the temperature in cooling / freezing cells and production areas. TD gets an alert, on the telephone, when temperatures beyond limits.

Seen registrations for expedition and cool cel for 2, 3 and 4 Sept 2016, no deviations).

Calibration of the temperature equipment is outsourced (seen report of 2016-01-22).

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.

4.9 Chemical and physical product contamination control

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

Control of chemicals on site was demonstrated.
Pre SSOP and SSOP instructions are in place to control contamination.

4.9.1 Chemical 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

Knives are provided in sets. In the SSOP there is signed that no knives are missing. Visual checks on knives and needle breakage is done at start up. (Pre SSOP) In trace test seen SSOP and Pre SSOP registrations 2016-08-24.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Quarterly glass audits do take place on F-ENS-NL-10031. Seen audit records from 2016-10-06, 2016-07-18 and 2016-04-20. Daily SSOP records seen in the vertical traceability test 2016-08-24.

4.9.4 Products packed into glass or other brittle containers

NA, No such containers

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 detection and removal equipment

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

4.10.2 Filters and sieves

NA, No sieves / filters used.

4.10.3 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 10,0 mm; Non FE 7,1 mm; RVS 316 8,7 mm,



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and in the packing department: Fe 4,0 mm; Non FE 4,0 mm; RVS 316 4,0 mm. Testing is every 3 hours and also at start and the end of the production day. Regular testing is demonstrated.

4.10.4 Magnets

NA, No magnets applied.

4.10.5 Optical sorting equipment

NA, No optical sorting equipment applied.

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

NA, no such containers are applied

4.11 Housekeeping and hygiene

A cleaning program 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 and production (F-ENS-NL-10036)

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 dolavs and crates are washed elsewhere (arranged by transporter). On a monthly base records of swabs are sent by . There is a washing machine for the washing of knives and a circulation system to avoid cross contamination.

4.11.7 Cleaning in place (CIP)

NA, no CIP

4.12 Waste / waste disposal

Different types of waste are defined. Correct collection and identification was demonstrated. Legal handling of categorised meat (Cat. 1 and Cat. 3) is collected by a licensed company.

Other waste is collected on call separately by

4.13 Management of surplus food and products for animal feed

Containers, crates etc. for Cat. 1 and Cat. 3 materials are well labelled.

Minor NC: According foreign body in crate for Cat. 3 in the deboning department.



4.14 Pest Control

Pest control is subcontracted to company [redacted] (contract 2016-03-24). Visit frequency is 8 times per year. Flying insect traps (EIV's) are checked 4 times a year. Quality in depth inspections are executed 2 times per year, seen QA inspection 2016-04-18 and PRI ("pest risico inventarisatie") 2016-04-15. Some advises were given. Some infestations were reported over last year (mostly outside). Corrective actions from the inspections and visits are very well kept and managed in a timely manner. Specs are present on the website. No toxic traps inside the premises. Once a year the EIV light bulbs are renewed.

Minor NC: According no demonstrable monitoring activities on pest for not is use parts of the building (old slaughterhouse and some offices).

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 [redacted]. 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.

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5	Only low risk areas
4.3.6	Only low risk areas
4.3.7	Only low risk areas
4.3.9	No temporary constructions.
4.4.13	Only low risk areas
4.5.3	No non potable water used for initial product cleaning.



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

5. Product control

5.1 Product design/development

Process improvements are done based upon investment projects. The product development process is centrally organised within the VION Food organisation. 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 entrance per quarter, in crates, boxes, plastic, do lav. Instructions per labelling activity are in place.

5.3 Management of allergens

No allergens onsite.

5.4 Product authenticity, claims and chain of custody

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. For Enschede one supplier delivers sliced meat. This supplier is rated as middle risk. So an audit has been performed (seen audit report 2016-



06-18).
Segregation and correct identification is established for organic beef (Skal nummer).
GMO's are not on site (raw material specifications).

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. Product contact liners applied are coloured. 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 COA's micro biological results for "biefstuk 200g" beef (in the vertical audit) for fresh product and product on expire date. Results for Aerobic mesophilic count, Enterobacteriaceae, Salmonella, Listeria, Salmonella (5 samples) were within limits. Analysis by external laboratory

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).

Details of non-applicable clauses with justification

Clause reference	Justification



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 starts up checks are applied as pre SSOP's and during the day SSOP are reported. Records checked on the audit day and in 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).

6.2 Labelling and pack control

At the packing department several checks are done to control that products are packed in the right packaging. Labels have to be checked at the beginning and the end of each batch. The checked labels are attached to the records of packing checks. Records checked on the audit day and in the vertical audit.

6.3 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 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.

Minor NC: For the E-weighing of consumer units (sliced beefparts) on a not authorised weighing scale.

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.

There is a monitoring and registration system for the temperature in cooling / freezing cells and production areas. Calibration of the temperature equipment is outsourced (seen report of _____).

Temperature devices (hand thermometers CCP and CP related) and scales (legal issue) were sampled and in found calibrated. Seen: hand thermometer used at receiving (_____ calibrated 2016-10-31) and hand thermometer used at dispatch (_____ calibrated 2016-10-31) both present on calibration form F-ENS-NL-10020.

Daily all weighing equipment is checked with a weight (F-ENS-NL-10009). Yearly the balances are external calibrated by _____. Seen report for floor scale 2016-02-01.

Metal detectors are calibrated by _____ Seen report Metal detector packing 2016-03-14.

Details of non-applicable clauses with justification

Clause reference	Justification
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6.2.4	No on-line vision equipment used.

7. Personnel

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

The 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 (seen overview 2016)

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. 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 (HACCP toets) is every two year repeated.”.

Seen personal training records for personal:

Operator packaging Metal detection 2016-01-19, HACCP toets 2015-08-26

Operator curing meat (flexworker): HACCP toets 2015-07-05, instruction “Werken bij Vion voor Flex” 2015-07-05

Foreman receipt : HACCP toets 2015-10-22, Training CCP temperature 2015-10-22, Training SSOP 2015-10-22.

Internal auditor followed “Interne audit training” by LRQA 2015-07-09.

HACCP teamleader followed HACCP update course 2016-05-31.

The latest HACCP-team training was given on 2015-01-25.

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 are 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 Medical screening

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

Housekeeping policy defines acceptable clothing and their individual cleaning.

Visitors and contractors are supplied with protective clothing as required. For employees: white clothing (coats, overalls, tops and trousers) is provided to all production staff. Disposable hair nets are in use; bear snoods are in use. Safety shoes also provided. For Visitor's coats, shoes and hairnets are provided.

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.

Cleaning facilities are provided. Knives and metal gloves are washed by the company at the entrance with hydrogen peroxide 35%.

Details of non-applicable clauses with justification

Clause reference

Justification

7.4.4

No High-Risk or High-Care applicable.



Module 8 - Traded Goods

Steps

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



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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

Module 11: Meat supply chain assurance	
Scope	
11.1 Traceability	
11.2 Approval of meat supply chain	



Lloyd's Register
LRQA

11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training

