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LRQA

Audit Report

Global Standard for Food Safety Issue 7: July 2015

1. Audit Summary			
Company name	VION Enschede B.V.	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	NA		
Audit Finish Date	2018-11-06		
Re-audit due date	2019-11-11		

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

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	AA	Previous audit date	2017-11-10		
Number of non-conformities	Fundamental				0
	Critical				0
	Major				0
	Minor				6

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Report No. RQA1032600 job 1369870

Auditor:

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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, CoC CBL, ISO9001 (multisite)				
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	Introduction of VOS (VION Operating System, a management system based on Lean management)				
Company Description	<p>VION Enschede B.V. is a site of VION Food Group in which beef is manufactured for retail and industry. This beef plant is together with the two other Dutch beef plants, led by the German VION Beef group. VION Enschede is bought summer 2010 out of a bankruptcy and 30 August 2010 the production is restarted. The former cattle slaughterhouse is still there and maintained but close for operation. The production consists of two halls for production and several cells for storage. There is an area for receiving and dispatching hanging goods and an area for receiving and dispatching goods in bulk. Some 280 employees work in one shift (about 210 employees via subcontractors) mainly in production. There are 4 maintenance workers, a sales team, finance manager, two on QA and two persons on HR. Main activity is the deboning and packing of fresh beef for retail organizations and meat industry. There are 3 type of products (so 3 HACCP studies): slice (which can be injected), minced meat and bulk. There</p>				



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4. Company Profile

are cutting lines and packaging lines and a fresh meat line. On site (9500 m2) is app 5300 m2 in use by factory and some 1200 m2 for offices, utilities and maintenance. Of 5300 m2 not all is in use as the former slaughtering house is partly closed

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
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Finished product safety rationale	Chilling (temperature <7°C), salting, vacuum packing
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High care	No	High risk	No	Ambient high care	No
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Justification for area	No ready to eat product
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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 Choose an allergen
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Product claims made e.g. IP, organic	Organic, BLK
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Product recalls in last 12 Months	No
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Products in production at the time of the audit	Beef quarters, 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	18 Hours were calculated but reduced to 16 hours because of a mature system and good results in the past.		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2018-11-05	08.30	17.00
2	2018-11-06	08.30	16.30

Auditor (s) number(s)	Names and roles of others
Auditor Number	– 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	X
Quality Manager	X	X	X	X
QA	X	X	X	X
Bedrijfsleider Retail	X	X		X
Bedrijfsleider	X	X		X
Uitbenen				
HR Manager				X
HR Officer	X		X	

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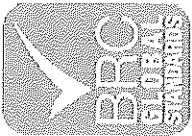
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Present at audit				
Finance	X		X	X
Sales	X			X
accountmanager			X	
Foreman reception carcasses		X		
Foreman deboning		X		
Foreman bulk packing (snipper)		X		
Foreman dispatch		X		
operator meat curing		X		
Foreman Maintenance		X	X	
Packing operator		X		
Witness Auditor	X	X	X	X



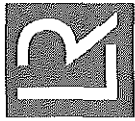
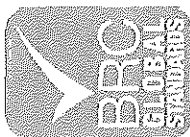
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Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
No.	Clause	Details of non-conformity	Critical or Major?

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

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

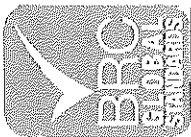


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No.	Clause	Details of non-conformity	Correction	Proposed action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by
1	1.1.4	<p>There is not a demonstrable meeting program which is adhered to. There are two types of HACCP-teams seen in practice (MT and Production) and one is described in procedure. Not clear which responsibilities are defined for what team.</p> <p>CLOSED TO BE VERIFIED</p>	<p>There has been a meeting with QA, HR and General manager. We have made a new procedure on meetings. There will be only one HACCP team as in procedure HACCP team Enschede (P-ENS-NL-10006). The other meeting will be the new "productie overleg".</p>	<p>QA has sent an email to different departments with the new procedure P-ENS-NL-10043 will start in the next month.</p>	<p>Seen: Procedure Overlegstructuur Vion Enschede (P-ENS-NL-10043) Procedure HACCP Team Enschede (P-ENS-NL-10006)</p>	2018-11-26	
2	3.5.1.2	<p>Suppliers of non food (packaging) are not demonstrably approved. This is a HQ responsibility but it is not demonstrated that complaints on suppliers are communicated to relevant HQ responsible and that results of approvals are communicated.</p> <p>CLOSED TO BE VERIFIED</p>	<p>There has been a meeting and we make a new procedure from the things we already do in practice. New agreements have been made and written in this document.</p>	<p>QA has sent an email to the different departments with the new procedure.</p>	<p>Seen: Procedure Inkoop non-food goederen (P-ENS-NL-10044)</p>	2018-11-26	
3	3.8.1	<p>The procedure on accepting returned goods is not verified correctly as seen practice is not conform. Also, the administration around the returned goods is not described correctly in P-ENS-NL-10008.</p> <p>FULLY CLOSED</p>	<p>The procedure P-ENS-NL-10008 has been checked with sales. Practice and theory is now the same.</p>	<p>QA has sent an email to the different departments with the new procedure and complaints form.</p>	<p>Seen: Procedure Retoureren (P-ENS-NL-10008) Klachtenformulier Vion Enschede (F-ENS-NL-10053)</p>	2018-11-26	

Minor

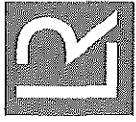
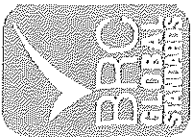
4	4.9.1.1	<p>The approved list of chemicals for purchase is not complete as the non food grade lubricants are not included and the chemicals in the maintenance workshop are not included (the list with food grade greases is complete). The allergen status of the Innotec food grade grease is not know. (The allergens status of the : greases is).</p> <p>FULLY CLOSED</p>	<p>There is a list of chemicals which has been just as by the cleaning. This list is completed with the products from the maintenance workshop.</p>	<p>There is a new list of chemicals which will be controlled by QA. You can also see on this list if the food grade grease has an allergen status. This will be checked every year by QA.</p>	<p>Seen: Formulier Chemicaliën overzicht (F-ENS- NL- 10052)</p>	2018-11-26	
5	6.3.1	<p>It was observed that product entfrecote batch with weight 180 gr on fixed weight, was packed with an average weight in 45 kg of 178,8 grams. The product was not under e-weighting legislation.</p> <p>CLOSED TO BE VERIFIED</p>	<p>There has been a meeting with sales, QA and general manager. They decided that every packaging that has a fixed weight has to be produced by procedure P-ENS-NL-10001 (Procedure e-weging). So all product is being e-weighted.</p>	<p>The department ICT will change the description on the label. The department Skinpack get an meeting to give them the new information for the procedure e-weging.</p>	<p>Seen: Procedure E- weging (P-ENS-NL- 10001) Werkinstructie E- weging (P-ENS-NL- 10002). Seen altered label Customer D. in Denmark</p>	2018-11-30	
6	7.1.3	<p>HR cannot demonstrate that the training on HACCP is 2 yearly executed as planned. There is some proof that the training is done but not taken up in the general overview.</p>	<p>There has been a presentation in the canteen at 08-03-2018. It has been given by / and . No attendance list has been made. There is only a power point presentation with the information</p>	<p>There has been a new procedure 'Opleidingen voedselveiligheid en hygiëne' (P-ENS-NL-10042). We start with this procedure in</p>	<p>Seen: Ppt.20180308 Hygiëne voorlichting kantine Procedure</p>	2018-11-26	



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Minor				
	CLOSED TO BE VERIFIED	what has been told this day.	November 2018.	Opleidingen voedselveiligheid en hygiëne (P-ENS-NL-10042).

Non-conformities are minor and closed.	
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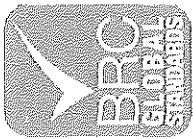
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Voluntary Modules Non-Conformity Summary Sheet

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

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



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FSMA Module Non-Conformity Summary Sheet

Critical						
No.	Clause	Details of non-conformity		Anticipated re-audit date		
Major						
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed

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



Detailed Audit Report

1. Senior management commitment	
1.1 Senior management commitment and continual improvement	
<p>The company demonstrated an effective food safety management system, which is maintained 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 according to the VION VOS method (VION Operating System). All procedures are linked to this system and actions are followed up by root cause analysis and corrective actions (+ verification). This system has had a boost recent year and more elements are taken up in production on communications and corrections.</p> <p>Policy on "Beleid & Doelstellingen signed off is seen, KPI's are defined local and from HQ. 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 several minutes of MT/Production/HACCP team meetings. The management review is kept at a yearly base, seen evaluation over July 2017 – June 2018. 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 and KPI's. Seen report Q1, Q2 2018.</p> <p>Non-conformities identified at the previous BRC7 audit against the Global Standard for Food Safety are effectively corrected and did not reoccur.</p> <p>Minor 1: The objectives of the site do not comply with the objectives from HQ. Alignment is not demonstrated. In the quarterly review are plotted the objectives of HQ and additional objectives are observed in the site overview.</p>	
1.2 Organisational structure, responsibilities and management authority	
<p>The organisation chart (F-ENS-NL-10020 v5 dd 30-10-2018) shows the organisations' structure and is supported by job profiles with responsibilities and authorities. Yearly appraisal meetings are held. Last year a new training coordinator is installed to guide new employees and to be trained employees with training on the job, which was a successful implementation. A production supervisor is now appointed to implement the VOS into production departments guiding on huddle, mmm, communication and discipline. The management team is formed by Director and managers, most present in the opening and closing meeting of the audit.</p>	
Details of non-applicable clauses with justification	
Clause reference	Justification



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 (P-FOOD-10000). The HACCP system of the site is developed by a multi-disciplinary team which is the Management Team.

The verification/ management review contains the HACCP verification (e.g. CCP's, audits, hygiene inspections, complaints, changes in legislation, review of process diagrams. HACCP team meeting is 4x / year. HACCP team is well trained and experienced and expanded with the new QA Officer. (See minor 1 for meeting program of the team).

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 dispatch (CCP temperature on outgoing and returns). 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. 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 fresh hanging meat.

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

The local HACCP plan is reassessed in sept 2018. It is made with input of the central HACCP plan. No alterations in CP's or CCP's. Reassessment taken up in the quarterly management review.

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. Also several other software systems are applied to manage information, HR has its own manual (also HQ managed).



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3.2 Document 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). There are P for procedure and instruction and F for forms and some other types ass MMI's Work instructions for employees are available in 4 languages.

3.3 Record completion and maintenance

Records are kept for 3 years (max shelf life fresh 35 days). Several records are checked, also as part of the vertical audit and during production.

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. Announced and unannounced internal audits are performed by several VION auditors being QA mangers from other VION sites. Both conformity and non conformity is reported resulting in demonstrable follow up of actions.

Seen the internal audits dd 25-10-2017 by . and 21+22-06-2018 by

Furthermore, there is a scheme of inspections in SSOP forms and Pre SSOP forms indicating a high amount of daily inspections.

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 MMI's before they can be used. Carcass suppliers are audited regularly by VION (, and corrective actions are recorded. Seen audit reports and BRC certificate of VION Leeuwarden, recently opened and BRC certified. Of all carcasses it is known were they are born, bread and slaughtered. In past year the amount of carcass suppliers is decreased due to a shift in strategy. Carcasses are bought by VION Intercompany (74%) by contract (24%), and sometimes on the free market from preferred suppliers. No raw material is bought from agents / brokers.

Minor 2: Suppliers of non food (packaging) are not demonstrably approved. This is a HQ responsibility but it is not demonstrated that complaints on suppliers are communicated to relevant HQ responsible and that results of approvals are communicated.

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 (if relevant) on temperature (CCP). Records are created seen on checklist F-ENS-NL-10018 v3 23-10-2015. Microbiological parameters are analysed by external lab . Also, supplier audits are done, generally audits are arranged VION central. (QA manager of VION Enschede is



highly involved in the implementation of the QA system in VION Leeuwarden, key supplier of VION Enschede.)

Meat supplies are monitored onsite as every hook with beef is visual checked at delivery and recorded, temperature is measured. Seen registrations on F-ENS-NL-10003, at receipt of carcasses during the audit.

3.5.3 Management of suppliers of services

All service suppliers are managed by VION Food NL in Boxtel (HQ). 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 during the vertical audit. (See minor 2 in 3.5.1)

3.5.4 Management of outsourced processing and packing

All activity is arranged by headquarters. HQ arranges transport, storage and plate-freezing (outsourced to subcontracted suppliers who are certified to GFSI standard). : in (certificate BRC Food) and transport is arranged by HQ. Communication on complains or remarks are via HQ.

3.6 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished product are defined and managed by the involved QA and maintenance department. Maintenance for cleaning agents, equipment to be in contact with food, lubricants and other technical aids. QA for packaging, additives, and raw materials. Several specifications seen in vertical audit:

- (incl declaration on allergens status)
- Technical data sheet
- Klantspecificatie Rundvlees Achtermuis gevlied dd 06-11-2018 (Specifications of finished goods are kept by the sales department and available in dedicated parts of IT, also visible to production. Seen list PLU lijst DK Enschede.xlsx on all articles to be sold to Denmark including pricing and labelling.

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 can lead to an "A4-" or "A3-verbeterplan" meaning a controlled method of managing non conformities. Details of corrective actions and closing out are kept including root cause analysis as seen for several 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 to the floor, special educated operators can tidy up this meat on a special table as documented in P-ENS-NL-10004. All fallen meat incidents have to be reported on the SSOP-checklists. Non-conforming products are categorised to CAT 1 or CAT 3. Blocked products are accompanied by form F-ENS-NL-10021.

Returned products are handled according P-ENS-NL-10008.

Minor 3: The procedure on accepting returned goods is not verified correctly as seen practice is not conform. Also, the administration around the returned goods is not described correctly in P-ENS-NL-10008.



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 return of (Achtermuis) art 3821 packed 21-09-2018, slaughtered 19-09-2018, delivered to the customer, picked up by the customer dd 26-09-2018. All relevant information was retrieved. Specifications and calculation documentation and all clients supplied to were demonstrable.

Mass balance was correct and CCP records available (batch

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

The yearly company test is reported 15-08-2018 as pre described by the trace test and recall procedure P-ENS-NL-10017 and was evaluated. It was on an order with 80/20 meat.

3.10 Complaint handling

Complaints are received from local sales offices and from headquarters and managed in an 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). 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 retours together are expressed in €/1.000 ton or €/amount of orders and discussed quarterly as a KPI's in MT.

There are no complaints on food safety. There were no complaints from authorities. Most complaints are on weight loss which is considered a complaints. The target on food safety complaints is 35/quarter and on integrity complaints 10/quarter. Also, a target on complaint follow up (no open complaints of more then 14 days set to 3/quarter.)

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 P-ENS-NL-10017 applies. A combined traceability/ recall test is reported on 2018-08-15. 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 (external facility provider) in place with check for visitors and lorry drivers. Separate storage takes place for cleaning chemicals, lubricants and waste. Two entrances for pedestrians and one for vehicles. There is a documented assessment of the security included in F-ENS-NL10040 Risico management beheersplan Product en procesintegriteit.

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.

Some condensation, no risk to product was observed.

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: 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 (). Which is on hours of working and not at planned intervals and specification compressor oil () Food grade Fluid".

Seen sample of inspection of water from the main dd 2-10-2018 conducted by

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. No new equipment acquired past year.

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 on F-ENS-NL-10033 by maintenance engineers on all departments. Also is daily checked if all maintenance tools are complete, clean and not damaged. There is a monitoring and registration system for the temperature in cooling / freezing cells and production areas. Maintenance gets an alert, on the telephone, when temperature is beyond limits. Calibration of the temperature equipment is outsourced and well controlled.

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 cantina 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 product" 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.

Minor 4: The approved list of chemicals for purchase is not complete as the non food grade lubricants are not included and the chemicals in the maintenance workshop are not included (the list with food grade greases is complete). The allergen status of the food grade grease is not know. (The allergens status of the greases is).

4.9.2 Metal control

Knives are provided in sets. In the SSOP there is signed off that no knives are missing. Visual checks on knives and needle breakage is done at start up (Pre SSOP). In the trace test seen SSOP and Pre SSOP registrations 2018-09-21.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Quarterly glass audits do take place on F-ENS-NL-10031. Seen daily SSOP records in the vertical traceability test 2017-09-04 of several departments bij

4.9.4 Products packed into glass or other brittle containers

NA, no such containers



4.9.6 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 and in 2017 an x-ray is acquired which is in operation. Validation is completed so limits and rejection scheme is available.
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 CP 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. The x ray device is behind the detector in the cutting 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, 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 as well as recording results. Seen record of testing on 21-9-2018 on F-ENS-10023 v3 16-10-2017
4.10.4 Magnets
NA, No magnets applied.
4.10.5 Optical sorting equipment
NA, No optical sorting equipment applied.
4.10.6 Containing cleanliness - glass jars, cans and other rigid containers
NA, no such containers are applied
4.11 Housekeeping and hygiene
<p>A cleaning program v20 dd 30-1-2018 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:</p> <p>Rotating cleaning program is in place twice a week to avoid and prevent lime scale. Nine 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).</p> <p>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. Concentration measuring is yearly exercised and outsourced.</p> <p>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</p>



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.	
4.14 Pest control	
Pest control is subcontracted to company (contract 2016-03-24). Visit frequency is 8 times per year. Flying insect traps (EIV's) are checked 4 times a year. Seen site maps with traps allocated, yearly verified. Quality in depth inspections are executed twice per year, seen QA inspection and PRI ("pest risico inventarisatie") dd 2018-03-13. 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. The trend analysis is generated from the online module and used as input in the management review.	
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/weeks 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, 4.3.6, 4.3.7, 4.4.13, 4.8.4, 4.8.5	Only low risk areas
4.3.9	No temporary constructions.
4.5.3	No non potable water used for initial product cleaning.
4.9.4, 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 VO 1760/2000 on "country of birth, breed and slaughter" applies. No validation last year.	
5.2 Product labelling	
Product is labelled in all stages of storing: at entrance per quarter, in crates, boxes, plastic, dolav. Instructions per labelling activity are in place. If labelling errors and mistakes take place these are reported in the complaints category 'Integrity'.	
5.3 Management of allergens	
Company has a policy on allergens: wants to be allergen free. So 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 several audit have been performed Segregation and correct identification is established for organic beef (Skal nummer 028065). GMO's are not on site (raw material specifications). Furthermore VION Enschede has a declaration on Chain of Custody on verification of authenticity and transparency.

5.6 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 x-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. Trend analyses is made over 10-2017 to 9-2018.

5.6.2 Laboratory testing

Seen COA's micro biological results for pooled product on salmonella and Listeria. In the vertical audit were raw materials on which TC, Entero's also is tested. Testing on for fresh product and product on expiry 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
5.3.2 5.3.3 5.3.4 5.3.5 5.3.6 5.3.7 5.3.8	No allergens on site
5.6.2.2	No lab onsite



6. Process control	
6.1 Control of operations	
<p>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.</p> <p>Organic is produced at the start of the day and during the audit organic beef was produced. Excel sheets are used to communicate and account for production values and identification of batches.</p> <p>In the retail department curing, tumbling and slicing takes place and good process control was seen.</p>	
6.2 Labelling and pack control	
<p>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.</p> <p>There are labels on fresh meat in primary packaging as vacuum foils and bags and there are labels on packed, slices, cured or processed meat. Also labelling applies on boxes, crates and other secondary packaging</p>	
6.3 Quantity, weight, volume and number control	
<p>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 and mass balances are used to check correct appliance.</p> <p>E-weighing is done at the packing department and is described in F-ENS-NL-10001. Licence is in use since 27-04-2011 of NMI.</p> <p>Injection quantity is recorded on F-ENS-NL-10025 and 10026 to record machine adjustments and monitor weight increase. Injection was in operation during the audit and weight and temperature were measured and within limits.</p> <p>Minor 5: It was observed that product entrecote batch _____ is pack with weight 180 gr on fixed weight, was packed with an average weight in 45 kg of 178,8 grams. The product was not under e-weighing legislation.</p>	
6.4 Calibration and control of measuring and monitoring devices	
<p>Calibration procedures ensure relevant equipment is identified and regularly calibrated on calibration form F-ENS-NL-10020.</p> <p>There is a monitoring and registration system for the temperature in cooling / freezing cells and production areas. Calibration of the temperature equipment is outsourced.</p> <p>Temperature devices (hand thermometers CCP and CP related) and scales (legal issue) were sampled and found calibrated. Seen: hand thermometer used at dispatch 1 _____ 366 valid until 1-1-2018.</p> <p>Daily all weighing equipment is checked with a weight (F-ENS-NL-10009). Yearly the balances are external calibrated by _____. Metal detectors are calibrated by _____ Seen report Metal detector serial #: _____ 309 calibrated 19-07-2018.</p>	



Details of non-applicable clauses with justification	
Clause reference	Justification
6.2.4	No on-line vision equipment used.
7. Personnel	
7.1 Training - raw material handling, preparation, processing, packing and storage areas	
<p>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 2017 ytd)</p> <p>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 and is about to become an elearning module. Seen personal training records for several key personnel on Metal detection, HACCP toets, Instruction "Werken bij Vion voor Flex", CCP temperature, Training SSOP, Internal auditor/"Interne audit training" by LRQA 2015-07-09, HACCP update course.</p> <p>There are two xlsx -files to demonstrate education and training on competencies and on training: "Invoeren opleidingsoverzicht" and "Personeelsmatrix".</p> <p>The inductionfilm and training is available in 6 languages (Dutch, Polish, Slovakian, Hungarian, German and Rumanian).</p> <p>Minor 6: HR cannot demonstrate that the training on HACCP is 2 yearly executed as planned. There is some proof that the training is done but not taken up in the general overview.</p>	
7.2 Personal hygiene - raw material handling, preparation, processing, packing and storage areas	
<p>Hygiene regulations: available in 4 languages (Dutch, German, English and Polish).</p> <p>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.</p> <p>Effectiveness of the hygiene procedures for personnel is part of the SSOP system.</p>	
7.3 Medical screening	
<p>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.</p> <p>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.</p>	



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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 and 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.

Details of non-applicable clauses with justification

Clause reference	Justification
7.4.4	No High-Risk or High-Care applicable.



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Module 8 - Traded Goods	
Scope	
8.1 Approval and performance monitoring of manufacturers/packers of traded food products	
8.2 Specifications	
8.3 Product inspection and laboratory testing	
8.4 Product legality	
8.5 Traceability	



Module 9: Management of Food Materials for Animal Feed	
Scope	
9.1 Management Commitment	
9.2 HACCP	
9.3 Outsourced Production	
9.4 Specifications	
9.5 Traceability	
9.6 Chemical and Physical Product Contamination Control	
9.7 Labelling	
9.8 Training	



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Module 11: Meat supply chain assurance	
Scope	
11.1 Traceability	
11.2 Approval of meat supply chain	
11.3 Raw material accept and inspection	
11.4 Management of cross-contamination between species	
11.5 Product testing	
11.6 Training	



Module 12: AOEGS Gluten-free Foods	
Scope	
12.1 Senior management	
12.2 Management of suppliers of raw materials and packaging	
12.3 Outsourced production	
12.4 Specifications	
12.5 Management of gluten cross-contamination	
12.6 Management of incidents, product withdrawal and product recall	
12.7 Labelling	
12.8 Product inspection and laboratory testing	



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Module 16 FSMA Preventive Controls Preparedness Module				
Item no.	Clause	Modification	Conforms (Y/N)	Comments
1	117.20	Handwashing areas, dressing and locker rooms, and bathrooms must have adequate lighting.		
2	117.37	The water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.		
3	117.40	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact.		
4	117.80	Ice used in contact with food must be manufactured in accordance with the good manufacturing practice (GMP) requirements of 21 CFR § 117.		
5	117.110	Where defect action levels (DALs) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot.		
6	117.130 (a)	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: <ul style="list-style-type: none"> • economic adulterants which affect food safety • environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • radiological hazards • unintentional adulterants that affect food safety. 		
7	117.130 (b)	All identified, known, or reasonably foreseeable hazards must be evaluated to determine 'hazards that require a preventive control' (i.e., significant hazards).		
8	117.135	Establish one or more preventive control(s) for each identified 'hazard that require a preventive control' (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.		
9	117.139	Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following: <ul style="list-style-type: none"> • notifying consignees of how to return or dispose of recalled product • conducting effectiveness checks to verify recall is 		



		<p>carried out</p> <ul style="list-style-type: none"> appropriate disposal of recalled product (i.e., destroy, divert, repurpose). 		
10	117.145	Establish monitoring activities and a written procedure for each preventive control in a manner consistent with the requirements of BRC section 2.10.		
11	117.150	Establish corrective action procedures when preventive controls are not implemented in a manner consistent with the requirements of BRC sections 2.11 and 3.7. Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).		
12	117.160	Validate all established process controls prior to implementation of the food safety plan, upon changes requiring revalidation or within 90 calendar days of the first food production. Validate allergen, sanitation and supply-chain controls as appropriate to the nature of the hazard, control and facility.		
13	117.165 (a)	The PCQI (or authorized designee) reviews the monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification. The PCQI (or their authorized designee) reviews the verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record has been created.		
14	117.165 (b)	Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following: <ul style="list-style-type: none"> sampling procedure to include method, quantity, frequency, and number of samples analytical method laboratory conducting an analysis corrective action procedure where a pathogen is detected. 		
15	117.165 (c)	Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following: <ul style="list-style-type: none"> adequate number and location of sample sites timing and frequency of sampling analytical method laboratory conducting the analysis corrective action procedure where a pathogen is detected. 		
16	117.165	Devices used to verify preventive controls must be calibrated.		
17	117.180	Identify a PCQI responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training or qualifications via job experience.		



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18	117.305	All records required by 21 CFR § 117 must include: <ul style="list-style-type: none">the date and time of the activity being documentedsignature/initials of individual performing the activity or conducting the record reviewinformation to identify the facility (e.g., name and location)the identity of the product and lot code where applicable.		
19	117.310	The owner, operator or agent in charge of the facility must sign and date the written food safety plan initially and again upon any changes following reanalysis.		
20	117.315	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours, with the exception of the food safety plan, which must remain onsite.		
21	117.405	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified and the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.		
22	117.420	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.		
23	117.430	One or more supplier verification activities (as defined in 21 CFR § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients and periodically thereafter at an adequate frequency.		