GLOBAL STANDARD
FOR FOOD SAFETY

Lloyd's Register
LRQA

Audit Report

Global Standard for Food Safety Issue 6: July 2011

1.Audit Summary

Company name	VION Food Nederland BV	BRC Site Code	1116869
Site name	Vion Retail Groenlo BV		
Scope of audit	Producing (cutting, slicing, mincing, battering, breading, blending, marinating) and packing (modified atmosphere, vacuum, skin packed) like beef, pork or poultry in consumer and bulk packaging..		
Exclusions from scope	none		
Audit Finish Date	2014-10-07		

2. Results

Audit result	Certificated	Audit grade	A	Audit type	Announced
Audit frequency	12 months	Re-audit due date	2015-10-28		
Previous audit grade	A	Previous audit date	2013-10-08		

Number of Non-Conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

3.Company Details

Address	Den Sliem 1, 7141 JE, Groenlo		
Country	The Netherlands	Telephone	+31 (0)544-473100
Commercial representative Name		Email	
Technical representative Name		Email	

4.Company Profile

Plant size (metres square)	9700	No. of employees		No. of HACCP plans	1

Subcontracted processes	No
Other certificates held	SKAL, IKB, BLK, Milieukeur, ISO 9001
Regions exported to	Europe Choose a region Choose a region Choose a region Choose a region Choose a region
Major changes since last BRC audit	New packing machines (skin pack and vacuum), export to Sweden

Company Description

VION Retail Groenlo BV (VRG) is one of the fresh meat products manufacturing sites of VION Food Nederland BV. Also to VION Food Nederland belong a headquarters in Boxtel, a logistic site, four slaughtering sites (1 for cattle and 3 for pigs) and six other fresh meat products producing sites.
VION Food Nederland BV is ISO9001:2008 certified. The site has the organic SKAL approval (021116) and is producing and packing BLK meat.
Main activity of VION Retail Groenlo BV is the producing of fresh meat and meat preparations (cutting, slicing, mincing, battering, breading, blending, marinating) and packing of fresh meat, meat preparations and meat products (chilled; modified atmosphere, vacuum skin pack) like beef or pork in consumer and bulk packaging.
In total approximately 23 production lines can be used. The customers are retailers and foodservice in the Netherlands, Denmark and Sweden.
The company employs approximately people and temporary workers. The production is organized from 6.00 am till 6.00 pm. The building is from 1992 and about 9700 m2. The company is certified BRC since 2002. EG 585.
The used quality system is based on one HACCP-study, which is centrally led and guided by the central QA headquarters in Boxtel. In 2010-2011 several investments have taken place: new dysers, injector, weighting system and (slicer and fresh meat portion machine). In June 2012 VION Retail Groenlo BV and VION Groenlo BV are merged to one company with one management. In July 2012 the products and production lines of VION Retail Schijndel were integrated in the site in Groenlo. In 2014 production volume has decreased caused by rearrangements of a retailer.
www.VIONfood.nl

5.Product Characteristics

Product categories	03 - Raw prepared products (meat and vegetarian) Category Category Category
Finished product safety rationale	Chilled raw meat of pork, beef, chicken; MAP, vacuum packed; short shelf life <14 days

High care	No	High risk	No

5.Product Characteristics

Allergens handled on site	Milk, soy, gluten, mustard
Product claims made e.g. IP, organic	Organic (SKAL), IKB, BLK, Milieukeur
Product recalls in last 12 Months	No
Products in production at the time of the audit	Fresh loin steaks into MAP packaging, Pork steaks into packaging, BIO smoked sausage into MAP packaging, soup balls chilled, mincing of dough for hamburgers and sausages, production and packing of sausage with coagulated casings

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	na		
Next audit type selected	Announced		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2014-10-06	08.30	16.30
2	2014-10-07	08.30	16.30

7.Key Personnel

Auditor Number	108137	Auditor Names and roles	, lead auditor

Present at audit

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

Present at audit				
/ QA manager	X	X	X	X
/ Foreman receiving and expedition			X	
/ Line responsible			X	
/ TOG			X	
/ employee service department		X	X	
/ Allround foreman CS			X	
/ HR manager		X		
/ Supervisor TD		X	X	
/ Innovation manager		X		
/ Product development employee		X		
/ Central QA VION Food Nederland				X

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Non-Conformity Summary Sheet

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

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

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Corrective action taken**	**Root cause analysis and proposed action plan**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Requirement ref.**	**Details of non-conformity**	**Corrective action taken**	**Root cause analysis and proposed action plan**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	1.1.2	Complaints and microbiological results are not presented in the weekly "KPI-lijst" so they are not reported to the management.	Complaints and microbiological result will be added to the weekly "KPI-lijst". New QA manager has started 06-10-2014.	1) No QA manager available. 2) The working activities were divided over 3 disciplines. Information was presented (KM rapportage) but not in "KPI-lijst".	KPI`s Vion Retail Groenlo week 38-41 presented as pdf. **Fully closed**	2014-10-27	

Minor							
2	1.1.3	Management review is presented in concept so yearly planned interval is not met.	Was discussed during "tier 2" and finalized. New QA manager has started 06-10-2014	1) No QA manager available. 2) The working activities were divided over 3 disciplines. Information was presented to location manager. 3) Was not made definite yet.	Pictures of "tier 2 bord" presented Review is made final. **Fully closed**	2014-10-27	
3	2.1.1	The food safety team as described in procedure P-VRG-NL-10004 is not in tact. It is not clear how the meeting programme of the food safety team is met.	The HACCP team will meet every first Tuesday of the month. Included as attachment is the agenda which will be used during these meetings. New QA manager has started 06-10-2014	1) No QA manager available. 2) No steady HACCP program. 3) Was discussed in "TIER 2 meetings" 4) All necessary disciplines were present during these meetings.	HACCP agenda presented **Fully closed**	2014-10-27	
4	3.6.1	There are no specifications available for raw material 10653 and 10654 on N:\. The translation of internal specs on N:\ to the central meat cuts book on VIONline.nl is not demonstrated.	A link between internal specs and the central meat cuts book (Snittenboek) will be made.	1) Specifications were no longer kept up-to-date on the NRM disc. 2) We assumed that our article numbers were also in the specifications in the "snittenboek"	The cross reference table is made and resented. **Fully closed**	2014-10-27	
5	4.1.1	External docking shelter on expedition side is broken and not maintained in good order. It is also dirty.	External Docking shelters are repaired.	There is a rebuild (expansion expedition) planned for the first quarter 2015. Renovation docking shelters on hold.Temporary repairs are made.	Pictures of restoration seen. **Closed, to be verified next audit**	2014-10-27	
6	4.11.4	Floor in QA office and door in central corridor and hand	Floor in QA office is cleaned, doors in the corridor are cleaned	1) Employees were too much focused on production	Pictures seen of situation	2014-10-27	

Minor							
		dryers in the hygiene corridor is dirty and not cleaned for a longer time.	as well as the [redacted] hand dryers.	areas and there for did not pay enough attention to these other areas. 2) Checks were always done by the "KWACO's" and are now done by production (as of begin October). 3) Retail Groenlo has chosen to put the quality awareness on a low level in the organization (work floor).	after cleaning, adjusted procedure presented **Fully closed**		
7	5.4.2	Not legitimate use of primary packaging material in Maintenance and production department.	Al primary packaging materials are removed from the maintenance department. Special containers will be placed for storage. Retraining personnel involved.	Employees were unaware of this rule.	Pictures of new containers, adjusted, arrangements are presented in a mail to personnel **Closed, to be verified next audit**	2014-10-27	
8	5.6.1	A positive release is available for heated to be reheated products No documented procedure is available	Heated to be heated products are added to the procedure. New blocking form is introduced (F-RGR-NL-10004).	Because of time constraints, the procedure already has started but not correctly described in the procedure.	Adjusted procedure and new blocking form are presented.	2014-10-27	

Minor							
					Closed, to be verified next audit		
9	6.1.1	Specification of 55075 (Hamlappen 600x4) is not available in production while being produced.	Forms were available but not on the right posistion. Employee did not follow procedure. A better procedure will be developed: There will be a digital directory for each production line available (on the "kassa"), target 31 January 2015.	After an internal audit (29-8-2014) the specification map was checked and complete. The specification is available but not in the directoy. A human mistake this was overseen.	Specification is available. Minutes of meeting with IT specialist is presented. **Closed, to be verified next audit**	2014-10-27	

Detailed Audit Report

1. Senior Management Commitment

1.1 Senior management commitment and continual improvement

A VION Food Group policy is in place, P-NL-10002 and for the site P-RGR-NL-10001, dd 300913, electronically signed by . Objectives are described by using a matrix with responsibilities for all department managers: complaints, people & safety, performance and costs. MT consists of the plant manager, two site managers, manager Maintenance, Manager HR, Manager F&C. Yearly management review takes place. Seen management review in concept created in September reviewing juli2013-june 2014, not signed by most senior manager and not evaluated in the MT.
KPI's are defined and MT evaluates the KPI's weekly during MT meetings. KPI communication to employees by using KPI monitoring graphs paper and on stands in the production areas and TV screen in the canteen. Management improvement plans are managed by using a PDCA board. During audit several sessions at stands were noticed so the company was able to demonstrate an adequate improvement system. System of escalating actions and aspects is: MMM – Huddles - Tier 1, Tier 2 (Local MT), Tier 3 (BU MT). If items occur to discuss HACCP it is added to the agenda of the weekly MT meetings.

Minor NC 1: Complaints and microbiological results are not presented in the weekly "KPI-lijst" so they are not reported to the management.

Minor NC 2: Management review is presented in concept so yearly planned interval is not met.

Requirement No	REQUIREMENT	Conforms
FUNDAMENTAL Statement of intent	**The company's senior management shall demonstrate they are fully committed to the implementation of the requirements of the *Global Standard for Food Safety* and to processes which facilitate continual improvement of food safety and quality management.**	Y
1.1.1	The company shall have a documented policy which states the company's intention to meet its obligation to produce safe and legal products to the specified quality and its responsibility to its customers. This shall be: • signed by the person with overall responsibility for the site communicated to all staff.	Y
1.1.2	The company's senior management shall ensure that clear objectives are defined to maintain and improve the safety, legality and quality of products manufactured, in accordance with the quality policy and this Standard. These objectives shall be: • documented and include targets or clear measures of success • clearly communicated to relevant staff • monitored and results reported at least quarterly to site senior	N

	management.	
1.1.3	Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually as a minimum, to review the site performance against the Standard and objectives set in 1.1.2. The review process shall include the evaluation of: • previous management review action plans and time frames • results of internal, second party and/or third party audits • customer complaints and results of any customer performance reviews • incidents, corrective actions, out of specification results and non-conforming materials • review of the management of the HACCP system • resource requirements. Records of the meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed time scale	N
1.1.4	The company shall have a demonstrable meeting programme which enables food safety, legality and quality issues to be brought to the attention of senior management at least monthly and allows for the resolution of issues requiring immediate action.	Y
1.1.5	The company's senior management shall provide the human and financial resources required to produce food safely in compliance with the requirements of this Standard and for the implementation of the HACCP-based food safety plan.	Y
1.1.6	The company's senior management shall have a system in place to ensure that the company is kept informed of scientific and technical developments, industry codes of practice and all relevant legislation applicable in the country of raw material supply, production and, where known, the country where the product will be sold.	Y
1.1.7	The company shall have a genuine, original hard copy or electronic version of the current Standard available.	Y
1.1.8	Where the company is certificated to the Standard it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.	Y
1.1.9	The most senior production or operations manager on site shall attend the opening and closing meetings of the audit for Global Standard for Food Safety certification. Relevant departmental managers or their deputies shall be available as required during the audit process.	Y
1.1.10	The company's senior management shall ensure that the root causes of non-conformities identified at the previous audit against the Standard have	Y

		been effectively addressed to prevent recurrence.	
1.2		Organisational structure, responsibilities and management authority	
Organogram seen, P-RGR-NL-10080 rev 14, containing functions and addressed names. During audit seen that personnel is well informed by communication boards in production and employees are able to show the use of all their relevant documentation. Communication structure is described in P-RGR-NL-10012 and in case of absence relevant deputies are described in P-RGR-NL-10003 dd 20-11-2013. Relevant personnel has access to software as VIONline and and other IT resources.			
Statement of Intent		The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality.	Y
1.2.1		The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	Y
1.2.2		The company's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instruction.	Y

2 The Food Safety Plan – HACCP			
FUNDAMENTAL Statement of Intent		The company shall have a fully implemented and effective food safety plan based on Codex Alimentarius HACCP principles.	Y

		A HACCP system is in place, P-FOOD-10000 and 10001 and P-VION-10020. All required aspects are addressed. Preventive measures are defined into CP's and CCP's. One CCP is defined: Temperature at receiving. Critical limits are clear for each type of meat or product received (fresh meat ≤7℃, vacuum fresh meat ≤ 6℃, organ meat ≤ 3℃, meat preparations ≤4℃, fresh poultry ≤4℃, cooked and smoked sausages ≤7℃, frozen ≤ -18°, heated products ≤-6 - +4 ℃, fresh vegetables and dairy ≤7℃. Measurement is 5x per batch received. During audit the receiving employee shows adequate CCP measuring, F-RGR-NL-10079, records seen. The thermometer used, no 80, was calibrated and correctly used and wiped with alcoholic tissues. CCP training is also organised, records seen for all receiving employees, dd 03-05-12 on knowledge of P-VGR-NL10076 concerning CCP training. HACCP-team is Manager Maintenance, Manager Production and Manager QA as described in P-RGR-NL-10004. The PRP is present in the HACCP system, P-VION-10006 and P-RGR-NL-10031. All required aspects are in place, 19 CP's are defined. All preventive measures are verified weekly by production, F-RGR-NL-10002. Intended use is defined, P-FOOD-10000. Flow diagrams present, P-RGR-NL-10044. Rework is described. All product waste is cat. 3. Seen during audit the use of cat. 3 crates underneath each production line. HACCP verification seen: reassessment was presented in concept sept. 2014. During the audit ready to heat product was seen (meat product) to be packed and labelled. Smoked sausage, burgers and meat balls are added to the product range. Implicating the category and scope of the audit is shifting. On these product a positive release procedure applied (see 5.6.1) but after the rca the company has decided to stop the activities with meat products. So only category 3 applies. Minor NC 3: The food safety team as described in procedure P-RGR-NL-10004 is not in tact. It is not clear how the meeting programme of the food safety team is met.	
2.1		**The HACCP food safety team – Codex Alimentarius Step 1**	
2.1.1		The HACCP plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality/technical, production operations, engineering and other relevant functions. The team leader shall have an in-depth knowledge of HACCP and be able to demonstrate competence and experience. The team members shall have specific knowledge of HACCP and relevant knowledge of product, process and associated hazards. In the event of the company not having appropriate in-house knowledge, external expertise may be used, but day-to-day management of the food safety system shall remain the responsibility of the company.	N
2.2		**Prerequisite programme**	
2.2.1		The company shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list: • cleaning and sanitising • pest control • maintenance programmes for equipment and buildings • personal hygiene requirements • staff training	Y

		• purchasing • transportation arrangements • processes to prevent cross-contamination • allergen controls. The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and shall be included within the development and reviews of the HACCP	
2.3		**Describe the product – Codex Alimentarius Step 2**	
2.3.1		The scope of each HACCP plan, including the products and processes covered, shall be defined. For each product or group of products a full description shall be developed, which includes all relevant information on food safety. As a guide, this may include the following, although this is not an exhaustive list: • composition, e.g. raw materials, ingredients, allergens, recipe • origin of ingredients • physical or chemical properties that impact food safety, e.g. pH, aw • treatment and processing, e.g. cooking, cooling • packaging system, e.g. modified atmosphere, vacuum • storage and distribution conditions, e.g. chilled, ambient • target safe shelf life under prescribed storage and usage conditions • instructions for use, and potential for known customer misuse, e.g. storage, preparation.	Y
2.3.2		All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company will ensure that the HACCP plan is based on this may include the following, although this is not an exhaustive list: • the latest scientific literature • historical and known hazards associated with specific food products • relevant codes of practice • recognised guidelines • food safety legislation relevant for the production and sale of products • customer requirements	Y
2.4		**Identify intended use – Codex Alimentarius Step 3**	
2.4.1		The intended use of the product by the customer shall be described, defining the consumer target groups, including the suitability of the product for vulnerable groups of the population (e.g. infants, elderly, allergy sufferers).	Y
2.5		**Construct a process flow diagram – Codex Alimentarius Step 4**	
2.5.1		A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP scope, from raw material receipt through to processing, storage and distribution. As a guide, this should include the following, although this is not an exhaustive list:	Y

		• plan of premises and equipment layout • raw materials including introduction of utilities and other contact materials, e.g. water, packaging • sequence and interaction of all process steps • outsourced processes and subcontracted work • process parameters • potential for process delay • rework and recycling • low/high-care/high-risk area segregation • finished products, intermediate/semi-processed products, by-products and waste.	
2.6		**Verify flow diagram – Codex Alimentarius Step 5**	
2.6.1		The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations shall be considered and evaluated. Records of verified flow diagrams shall be maintained.	Y
2.7		**List all potential hazards associated with each process step, conduct a hazard analysis and consider any measures to control identified hazards – Codex Alimentarius Step 6, Principle 1**	
2.7.1		The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and allergen risks (refer to clause 5.2). It shall also take account of the preceding and following steps in the process chain.	Y
2.7.2		The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following: • likely occurrence of hazard • severity of the effects on consumer safety • vulnerability of those exposed • survival and multiplication of micro-organisms of specific concern to the product • presence or production of toxins, chemicals or foreign bodies • contamination of raw materials, intermediate/semi-processed product, or finished product. Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.	Y
2.7.3		The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programmes, this shall be stated and the adequacy of the programme to control the hazard validated. Consideration may be given to using more than	Y

	one control measure.	
2.8	**Determine the critical control points (CCP) – Codex Alimentarius Step 7, Principle 2**	
2.8.1	For each hazard that requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by use of a decision tree. CCPs shall be those control points which are required in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level. If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process shall be modified at that step, or at an earlier or later step, to provide a control measure.	Y
2.9	**Establish critical limits for each CCP – Codex Alimentarius Step 8, Principle 3**	
2.9.1	For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control. Critical limits shall be: • measurable wherever possible, e.g. time, temperature, pH • supported by clear guidance or examples where measures are subjective, e.g. • photographs	Y
2.9.2	The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level.	Y
2.10	**Establish a monitoring system for each CCP – Codex Alimentarius Step 9, Principle 4**	
2.10.1	A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and wherever possible provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list: • online measurement • offlinemeasurement • continuous measurement, e.g. • thermographs, pH meters etc. • where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.	Y
2.10.2	Records associated with the monitoring of each CCP shall include the date, time and result of measurement and shall be signed by the person responsible for the monitoring and verified, as appropriate, by an authorised person. Where records are in electronic form there shall be evidence that records have been checked and verified.	Y
2.11	**Establish a corrective action plan – Codex Alimentarius Step 10, Principle 5**	

2.11.1	The HACCP food safety team shall specify and document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend towards loss of control. This shall include the action to be taken by nominated personnel with regard to any products that have been manufactured during the period when the process was out of control.	y
2.12	**Establish verification procedures – Codex Alimentarius Step 11, Principle 6**	
2.12.1	Procedures of verification shall be established to confirm that the HACCP plan, including controls managed by prerequisite programmes, are effective. Examples of verification activities include: • internal audits • review of records where acceptable limits have been exceeded • review of complaints by enforcement authorities or customers • review of incidents of product withdrawal or recall. Results of verification shall be recorded and communicated to the HACCP food safety team.	Y
2.13	**HACCP documentation and record keeping – Codex Alimentarius Step 12, Principle 7**	
2.13.1	Documentation and record keeping shall be sufficient to enable the company to verify that the HACCP controls, including controls managed by prerequisite programmes, are in place and maintained.	Y
2.14	**Review the HACCP plan**	
2.14.1	The HACCP food safety team shall review the HACCP plan and prerequisite programmes at least annually and prior to any changes which may affect product safety. As a guide, these may include the following, although this is not an exhaustive list: • change in raw materials or supplier of raw materials • change in ingredients/recipe • change in processing conditions or equipment • change in packaging, storage or distribution conditions • change in consumer use • emergence of a new risk, for example adulteration of an ingredient • developments in scientific information associated with ingredients, process or product. Appropriate changes resulting from the review shall be incorporated into the HACCP plan and/or prerequisite programmes, fully documented and validation recorded.	Y

3. Food safety and quality management system

3.1	**Food safety and quality manual**	
All relevant QA documents are digitally available and controlled in All procedures are clearly coded through the whole VION group, by using in the documents: VION, FOOD, NL and RGR.		
Statement of Intent	The company's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe product.	Y
3.1.1	The company's documented procedures, working methods and practices shall be collated in the form of a printed or electronic quality manual.	Y
3.1.2	The food safety and quality manual shall be fully implemented and the manual or relevant components shall be readily available to key staff.	Y
3.1.3	All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (e.g. there are issues of literacy or foreign language).	Y
3.2	**Documentation control**	
Statement of Intent	The company shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use.	Y
3.2.1	The company shall have a procedure to manage documents which form part of the food safety and quality system. This shall include: • a list of all controlled documents indicating the latest version number • the method for the identification and authorisation of controlled documents • a record of the reason for any changes or amendments to documents • the system for the replacement of existing documents when these are updated.	Y
3.3	**Record completion and maintenance**	
Statement of Intent	The company shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.	Y
3.3.1	Records shall be legible, retained in good condition and retrievable. Any alterations to records shall be authorised and justification for alteration shall be recorded. Where records are in electronic form these shall be suitably backed up to prevent loss.	Y
3.3.2	Records shall be retained for a defined period with consideration given to any legal or customer requirements and to the shelf life of the product. This shall take into account, where it is specified on the label, the possibility that shelf life may be extended by the consumer (e.g. by freezing). As a minimum, records shall be retained for the shelf life of the product plus 12 months.	Y

3.4	Internal audit	
Internal audits are scheduled, seen planning and realisation of 2013-2015. Audit procedure in place, P-VION-10011. Audit records seen dd 27-08-2013 by a trained and qualified auditor. Also records of 24-04-2013, 29-08-2013. Hygiene inspections by two monthly glass inspections, F-RGR-NL-10028, weekly CP verification, F-RGR-NL-10002 and daily prior production inspections, F-RGR-NL-10025. All listed items are checked, records seen and trended for analytic results.		
FUNDAMENTAL Statement of Intent	The company shall be able to demonstrate it verifies the effective application of the food safety plan and the implementation of the requirements of the Global Standard for Food Safety.	Y
3.4.1	There shall be a planned programme of internal audits with a scope which covers the implementation of the HACCP programme, prerequisite programmes and procedures implemented to achieve this Standard. The scope and frequency of the audits shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least annually.	Y
3.4.2	Internal audits shall be carried out by appropriately trained competent auditors, who are independent from the audited department.	Y
3.4.3	The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and the results shall be reported to the personnel responsible for the activity audited. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified.	Y
3.4.4	In addition to the internal audit programme there shall be a programme of documented inspections to ensure that the factory environment and processing equipment is maintained in a suitable condition for food production. These inspections shall include: • hygiene inspections to assess cleaning and housekeeping performance • fabrication inspections to identify risks to the product from the building or equipment The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas.	Y
3.5	Supplier and raw material approval and performance monitoring	
3.5.1	Management of suppliers of raw materials and packaging	
The purchase of raw material, additives, some maintenance suppliers and services, is organised and managed by head office. VION Retail Groenlo BV is authorised to order at approved suppliers. All supplied material is reviewed by the HACCP system for the required hazards. Several procedures for supplier approval are used for raw material, packaging, services, resp. P-FOOD-10025, P-FOOD-10029 and P-FOOD-10026. The catering is not a supplied service but inhouse. Suppliers of transport and storage are audited by VRG, yearly according contract. All received material is inspected, procedure P-RGR-NL-10034. Records made for meat: date and time		

of receiving, supplier name, EG no, truck sign, truck hygiene, meat authenticity and temperature (5x per truckload). Temperature measurement of all cooled raw material received is a CCP. Measurement seen during audit, see H2. Microbiological parameters of all raw material and additives are analysed by external lab. Heated raw materials to be packed are taken in on a positive release procedure (See H5) on Listeria.		
Statement of Intent	The company shall have an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including packaging) to the safety, legality and quality of the final product are understood and managed.	Y
3.5.1.1	The company shall undertake a documented risk assessment of each raw material or group of raw materials to identify potential risks to product safety, legality and quality. This shall take into account the potential for: • allergen contamination • foreign body risks • microbiological contamination • chemical contamination. Consideration shall also be given to the significance of a raw material to the quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.	Y
3.5.1.2	The company shall have a documented supplier approval and ongoing monitoring procedure to ensure that suppliers are manufacturing products under hygienic conditions, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval and monitoring procedure shall be based on one or a combination of: • supplier audits • third party audits or certification, e.g. to BRC Global Standards • supplier questionnaires. Where approval is based on questionnaires, these shall be reissued at least every three years and suppliers required to notify the site of any significant changes in the interim.	Y
3.5.1.3	The procedures shall define how exceptions are handled (e.g. where raw material suppliers are prescribed by a customer or where products are purchased from agents and direct audit or monitoring has not been undertaken).	Y
3.5.2	Raw material and packaging acceptance and monitoring procedures	
Statement of Intent	Controls on the acceptance of raw materials shall ensure that raw materials do not compromise the safety, legality or quality of products.	Y
3.5.2.1	The company shall have a documented procedure for the acceptance of raw materials and packaging on receipt based upon the risk assessment (3.5.1). Raw material acceptance and its release for use shall be based on one or a	Y

		combination of: • visual inspection on receipt • certificates of conformance – specific to each consignment • certificates of analysis • product sampling and testing. A list of raw materials and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined.	
3.5.2.2		The procedures shall be fully implemented and records maintained to demonstrate the basis for acceptance of each batch of raw materials.	Y
3.5.3		**Management of suppliers of services**	
Statement of Intent		The company shall be able to demonstrate that where services are outsourced, the service is appropriate and any risks presented to food safety have been evaluated to ensure effective controls are in place.	Y
3.5.3.1		There shall be a documented procedure for the approval and monitoring of suppliers of services. Such services shall include as appropriate: • pest control • laundry services • contracted cleaning • contracted servicing and maintenance of equipment • transport and distribution • off-site storage of ingredients, packaging or products • laboratory testing • catering services • waste management.	Y
3.5.3.2		Contracts or formal agreements shall exist with the suppliers of services which clearly define service expectations and ensure potential food safety risks associated with the service have been addressed.	Y
3.5.4		**Management of outsourced processing**	
No outsourced processing.			
Statement of Intent		Where any intermediate process steps in the manufacture of a product which is included within the scope of certification is subcontracted to a third party or undertaken at another company site, this shall be managed to ensure this does not compromise the safety, legality or quality of the product.	Y
3.5.4.1		The company shall be able to demonstrate that where part of the production process is outsourced and undertaken off site, this has been declared to the brand owner and, where required, approval granted.	Na
3.5.4.2		The company shall ensure that subcontractors are approved and monitored by successful completion of either a documented site audit or third-party	Na

	certification to the BRC Global Standard for Food Safety or other GFSI-recognised Standard (see Glossary).	
3.5.4.3	Any outsourced processing operations shall: • be undertaken in accordance with established contracts which clearly define any processing requirements and product specification • maintain product traceability.	Na
3.5.4.4	The company shall establish inspection and test procedures for outsourced product on return, including visual, chemical and/or microbiological testing, dependent on risk assessment.	Na
3.6	Specifications	
Specifications are available of finished product, raw material, packaging material, utilities, equipment, cleaning chemicals, lubricants used. VION has available online a meat cuts book to describe specifications of raw materials and finished products. VRG is in transition to develop a cross reference between their article numbers and the VION meat cuts book online. Nonconformities are labelled with red form F-RGR-NL-1004 and handled conform procedure. Each suspected product is investigated, decided on and recorded on F-RGR-NL-10018, if to be non-conform. The nonconformities are trended and part of the reassessment (H2). Minor NC 4: There are no specifications available for raw material 10653 and 10654 on N:\. The translation of internal specs on N:\ to the central meat cuts book on VIONline.nl is not demonstrated.		
Statement of Intent	Specifications shall exist for raw materials including packaging, finished products and any product or service which could affect the integrity of the finished product.	Y
3.6.1	Specifications for raw materials and packaging shall be adequate and accurate and ensure compliance with relevant safety and legislative requirements. The specifications shall include defined limits for relevant attributes of the material which may affect the quality or safety of the final products (e.g. chemical, microbiological or physical standards).	N
3.6.2	Manufacturing instructions and process specifications shall comply with recipes and quality criteria as detailed in agreed customer specifications.	Y
3.6.3	Specifications shall be available for all finished products. These shall either be in the agreed format of the customer or, in the case of branded products, include key data to meet legal requirements and assist the customer in the safe usage of the product.	Y
3.6.4	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that it has taken steps to ensure formal agreement is in place.	Y
3.6.5	Specifications shall be reviewed whenever products change (e.g. ingredients, processing method) or at least every three years. The date of review and the	Y

	approval of any changes shall be recorded.	
3.7	**Corrective action**	
FUNDAMENTAL Statement of intent	The company shall be able to demonstrate that they use the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence.	Y
3.7.1	The company shall have a documented procedure for handling non-conformances identified within the scope of this Standard to include: • clear documentation of the non-conformity • assessment of consequences by a suitably competent and authorised person • identification of the corrective action to address the immediate issue • identification of an appropriate timescale for correction • identification of personnel with appropriate authority responsible for corrective action • verification that the corrective action has been implemented and is effective • identification of the root cause of the non-conformity and implementation of any necessary corrective action.	Y
3.8	**Control of non-conforming product**	
Corrective actions are managed according procedure P-RGR-NL-10064. Nonconformities are labelled with red form F-RGR-NL-1004 and handled conform procedure. Each suspected product is investigated, decided on and recorded on F-RGR-NL-10018 by assigned deputies. If to be non-conform. The nonconformities are trended and part of the reassessment (H2).		
Statement of intent	The company shall ensure that any out-of-specification product is effectively managed to prevent release.	Y
3.8.1	There shall be documented procedures for managing non-conforming products which include: • the requirement for staff to identify and report potentially non-conforming product • clear identification of non-conforming product, e.g. direct labelling or the use of IT systems • secure storage to prevent accidental release, e.g. isolation areas • referral to the brand owner where required • defined responsibilities for decision making on the use or disposal of products appropriate to the issue, e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession • records of the decision on the use or disposal of the product • records of destruction where product is destroyed for food safety reasons.	Y
3.9	**Traceability**	
Traceability is managed by procedure P-VION-10015. All products produced have a short shelf life. A traceability test was performed during audit: Hamlappen 55075 4x600gr, produced on 25-04-2014 and shelf life 06-05-2014. All required information was available within the set timeframe. No rework was		

used. The test performed shows the procedure is efficient. Yearly a recall test, including a traceability test and a mass balance, is done. Last test dd 30-06-2014, including both finished product – raw material and raw material – finished product. Also a withdrawal is performed on 17-06-2014 on hamburgers with positive Listeria results.		
FUNDAMENTAL Statement of Intent	The company shall be able to trace all raw material product lots (including packaging) from their supplier through all stages of processing and despatch to their customer and vice versa.	Y
3.9.1	Identification of raw materials, including primary and any other relevant packaging and processing aids, intermediate/semi-processed products, part used materials, finished products and materials pending investigation shall be adequate to ensure traceability.	Y
3.9.2	The company shall test the traceability system across the range of product groups to ensure traceability can be determined from raw material to finished product and vice versa, including quantity check/mass balance. This shall occur at a predetermined frequency and results shall be retained for inspection. The test shall take place at least annually. Full traceability should be achievable within four hours.	Y
3.9.3	Where rework or any reworking operation is performed, traceability shall be maintained.	Y
3.10	Complaint handling	
Complaints are handled according procedure P-RGR-NL-10018. Complaints are an objective for the company. Complaints are discussed daily in the TIER meetings and reviewed weekly in the MT meeting. (H1: Minor NC) The communication for handling complaints with the customer is responsibility of head office. Plant is responsible for analysing, corrective and preventive actions and communication to sales. Complaints are categorised in 3 groups: Quality, Food safety and Foreign bodies. All records available, no issues seen during audit.		
Statement of Intent	Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.	Y
3.10.1	All complaints shall be recorded, investigated and the results of the investigation and root cause of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	Y
3.10.2	Complaint data shall be analysed for significant trends and used to implement on-going improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.	Y
3.11	Management of incidents, product withdrawal and product recall	
Recalls are managed by procedure P-VION-10015. All required aspects are addressed. Yearly a recall test, including a traceability test, is done. Last test dd 30062014. A product Withdrawal took place on 17-06-2014 concerning cooked frozen hamburgers to be packed at VION. Listeria was tested positive. Supplier is now deleted as supplier to VION. No recalls last year till now.		

Statement of Intent	The company shall have a plan and system in place to effectively manage incidents and enable the effective withdrawal and recall of products should this be required.	Y
3.11.1	The company shall have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain business continuity. Incidents may include: • disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications • events such as fire, flood or natural disaster • malicious contamination or sabotage. Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products.	Y
3.11.2	The company shall have a documented product withdrawal and recall procedure. This shall include as a minimum: • identification of key personnel constituting the recall management team, with clearly identified responsibilities • guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained • an up-to-date list of key contacts or reference to the location of such a list, e.g. recall management team, emergency services, suppliers, customers, Certification Body, regulatory authority • a communication plan including the provision of information to customers, consumers and regulatory authorities in a timely manner • details of external agencies providing advice and support as necessary, e.g. specialist laboratories, regulatory authority and legal expertise • a plan to handle the logistics of product traceability, recovery or disposal of affected product and stock reconciliation. The procedure shall be capable of being operated at any time.	Y
3.11.3	The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.	Y
3.11.4	In the event of a product recall, the Certification Body issuing the current certificate for the site against this Standard shall be informed within three working days of the decision to issue a recall.	Y

4. Site Standards

4.1 External standards

The production location is situated at an industrial area. No hazardous industries nearby. The outside area is paved and fenced with two gates. No outside storage of materials, equipment, packaging. (There was outsite storage of trolleys to be transported to another VION site.)
The design of the building (1992) has an efficient logistic lay out: receiving, storages → production CS (central butchery) and VK (quickly ready) → storages and expedition. A planned enlarging of the storage area of ready product and more logistic space is planned.

Minor NC 5: External docking shelter on expedition side is broken and not maintained in good order. It is also dirty.

Statement of Intent	The production site shall be of suitable size, location, construction and design to reduce the risk of contamination and facilitate the production of safe and legal finished products.	Y
4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on finished product integrity, and measures shall be taken to prevent contamination. Where measures have been put into place to protect the site (from potential contaminants, flooding etc.), they shall be reviewed in response to any changes.	N
4.1.2	The external areas shall be maintained in good order. Where buildings are surrounded by grassed or planted areas, they shall be regularly tended and well-maintained. External traffic routes under site control shall be suitably surfaced and maintained in good repair to avoid contamination of the product.	Y
4.1.3	The building fabric shall be maintained to minimise potential for product contamination (e.g. elimination of bird roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants).	Y
4.2	Security	

All entrances are restricted. All personnel and visitors enter the building through the main entrance. No other entrance is available, all secured. Personnel is using a badge to register their entrance. Visitors have to sign in, after reading the hygiene rules and comply to health instructions. After signing in visitors receive a visitor badge. Visitors are only allowed in the building together with the contacted employee. I Identification is mandatory, number of ID given is recorded. Access of drivers and logistics personnel is controlled. All docking trucks and trailers are recorded.
All employees, also temporary employees, are identified by recording a copy of their ID and BSN.
The site is registered and recognised by EG protocol: EG585.

Statement of Intent	Security systems shall ensure that products are protected from theft or malicious contamination whilst under the control of the site.	Y
4.2.1	The company shall undertake a documented assessment of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. Areas shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled. Identified security arrangements shall be implemented and reviewed at least annually.	Y
4.2.2	Measures shall be in place to ensure only authorised personnel have access to production and storage areas and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be	Y

	in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.	
4.2.3	Where required by legislation, the site shall be registered with, or be approved by, the appropriate authority.	Y
4.3	**Layout, Product Flow and Segregation**	
A site plan is available, F-RGR-NL-10032. No high care or high risk areas defined. On site only products are processed that will undergo full cooking prior to consumption. All production departments process open products. Low risk areas with high hygiene standards to prevent contamination. External workers have to sign in, after reading the hygiene rules and comply to the health instructions. Hygiene corridor is mandatory for all personnel and visitors. It is not possible to pass without following the procedure. There is only naked product in production areas and tempering storage. In other areas product is packed. No building work or refurbishment seen during audit.		
FUNDAMENTAL Statement of Intent	The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with relevant legislation.	Y
4.3.1	There shall be a plan of the site which designates areas where product is at different levels of risk from contamination; that is: • enclosed product areas • low-risk areas • high-care areas • high-risk areas. See Appendix 2 for guidance. This shall be taken into account when determining the prerequisite programmes for the particular areas of the site.	Y
4.3.2	The site plan shall define: • access points for personnel and travel routes • location of staff facilities and routes to the facilities from places of work • production process flow • routes for the removal of waste • routes for the movement of rework. If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials. All facilities shall be designed and positioned, where possible, so that movement of personnel is by simple, logical routes. The movement of waste and rework shall not compromise the safety of products.	Y
4.3.3	Contractors and visitors, including drivers, shall be made aware of all procedures for access to premises and the requirements of the areas they are visiting, with special reference to hazards and potential product	Y

	contamination. Contractors involved in maintenance or repair activities shall be under the supervision of a nominated person.	
4.3.4	In low-risk areas the process flow together with the use of demonstrably effective procedures shall be in place to minimise the risk of the contamination of raw materials, intermediate/semi-processed products, packaging and finished products.	Y
4.3.5	Where **high-care areas** are part of the manufacturing site there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality and utilities provision. Where physical barriers are not in place, the site shall have undertaken a full evaluation of the risks of cross-contamination and alternative effective processes shall be in place to protect products from contamination.	Na
4.3.6	Where **high-risk areas** are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality and utilities provision. The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimise risk of product contamination (e.g. the disinfection of materials on entry).	Na
4.3.7	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions.	Y
4.3.8	Temporary structures constructed during building work or refurbishment, etc. shall be designed and located to avoid pest harbourage and ensure the safety and quality of products.	Y
4.4	**Building fabric** **Raw material handling, preparation, processing, packing and storage areas**	
All walls, floors, ceilings, piping, lightning and ventilation is smooth and cleanable. Structures are designed to minimize risk of contamination. Lighting is covered and fly killer lights and glassing is protected. Drainage is suitable and sloped with gutters.		
Statement of Intent	**The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.**	Y
4.4.1	**Walls** shall be constructed, finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	Y
4.4.2	**Floors** shall be suitably hard wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious and maintained in good repair.	Y
4.4.3	**Drainage**, where provided, shall be sited, designed and maintained to minimise risk of product contamination and not compromise product safety. Machinery and piping shall be arranged so that, wherever feasible, process	Y

Cooling system is maintained by · at predicted intervals. No issues raised.		
Statement of Intent	Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination.	Y
4.5.1	All water used as a raw material in the manufacture of processed food, the preparation of product, or for equipment or plant cleaning shall be supplied in sufficient quantity, be potable at point of use or pose no risk of contamination according to applicable legislation. The microbiological and chemical quality of water shall be analysed at least annually. The sampling points and frequency of analysis shall be based on risk, taking into account the source of the water, on-site storage and distribution facilities, previous sample history and usage.	Y
4.5.2	An up-to-date plan shall be available of the water distribution system on site, including holding tanks, water treatment and water recycling as appropriate. The plan shall be used as a basis for water sampling and the management of water quality.	Y
4.5.3	Where legislation specifically permits the use of water which may not be potable for initial product cleaning (e.g. for the storage/washing of fish), the water shall meet the designated legal requirement for this operation.	na
4.5.4	Air, other gases and steam used directly in contact with or as an ingredient in products shall be monitored to ensure this does not represent a contamination risk. Compressed air used directly in contact with the product shall be filtered.	Y
4.6	Equipment	
All equipment is designed hygienic. All well cleanable with chemicals and hot water. Mainly stainless steel and blue belts. All conveyor belts in direct contact with food used are food safe considering migration legislation: seen migration statement 1935/2004 for Belt . dated 17-01-2012.		
Statement of Intent	All food processing equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product.	Y
4.6.1	All equipment shall be constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.	Y
4.6.2	Equipment which is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable.	Y
4.7	Maintenance	
Maintenance is organised by using a maintenance management system: . All lubricants used are listed. Chemicals are stored separately in a secured room. Lubricant types used per equipment is identified in . Toxic chemicals are only allowed where they cannot contaminate the product or equipment. Oil used in pressed air system is foodgrade specifications are available. The workshop is sufficient organised. A floor screen is present at the entrance of the production to avoid swarf bites into the production. No temporary repairs seen during audit.		

	waste water goes directly to drain. Where significant amounts of water are used, or direct piping to drain is not feasible, floors shall have adequate falls to cope with the flow of any water or effluent towards suitable drainage.	
4.4.4	Where sites include **high-care** or **high-risk** facilities, there shall be a plan of the drains for these areas which shows the direction of flow and location of any equipment fitted to prevent the back up of waste water. The flow of drains shall not present a risk of contamination of the high-care/risk area.	Na
4.4.5	**Ceilings and overheads** shall be constructed, finished and maintained to prevent the risk of product contamination.	Y
4.4.6	Where **suspended ceilings** or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed.	Y
4.4.7	Where there is a risk to product, **windows**, and roof glazing which is designed to be opened for ventilation purposes, shall be adequately screened to prevent the ingress of pests.	Y
4.4.8	Where they pose a risk to product, glass windows shall be protected against breakage.	Y
4.4.9	**Doors** shall be maintained in good condition. External doors and dock levellers shall be close fitting or adequately proofed. External doors to open product areas shall not be opened during production periods except in emergencies. Where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.	Y
4.4.10	Suitable and sufficient **lighting** shall be provided for correct operation of processes, inspection of product and effective cleaning.	Y
4.4.11	Where they constitute a risk to product, bulbs and strip lights – including those on electric fly-killer devices – shall be adequately protected. Where full protection cannot be provided, alternative management such as wire mesh screens or monitoring procedures shall be in place.	Y
4.4.12	Adequate **ventilation** and **extraction** shall be provided in product storage and processing environments to prevent condensation or excessive dust.	Y
4.4.13	**High-risk areas** shall be supplied with sufficient changes of filtered air. The filter specification used and frequency of air changes shall be documented. This shall be based on a risk assessment, taking into account the source of the air and the requirement to maintain a positive air pressure relative to the surrounding areas.	Na
4.5	**Utilities – water, ice, air and other gases**	
Utilities used are MAP gas (CO2 and O2), nitrogen gas for freezing and water (also as an ingredient into minced meat). No ice used. All gasses used are foodgrade. Water is used on site is potable water. The water is tested 4 times a year by (ISO 17025 accredited laboratory L132). Air used for direct contact with product (hamburger cylinder) is production air and is tested weekly for cleanliness of the system by production QA. The air system maintained by and ilters are replaces yearly. The		

Statement of Intent	An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.	Y
4.7.1	There shall be a documented planned maintenance schedule or condition monitoring system which includes all plant and processing equipment. The maintenance requirements shall be defined when commissioning new equipment.	Y
4.7.2	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment damage, the equipment shall be inspected at predetermined intervals, inspection results documented and appropriate action taken.	Y
4.7.3	Where temporary repairs are made, these shall be controlled to ensure the safety or legality of product is not jeopardised. These temporary measures shall be permanently repaired as soon as practicable and within a defined timescale.	Y
4.7.4	The company shall ensure that the safety or legality of product is not jeopardised during maintenance and subsequent cleaning operations. Maintenance work shall be followed by a documented hygiene clearance procedure, which records that product contamination hazards have been removed from machinery and equipment.	Y
4.7.5	Materials used for equipment and plant maintenance and that pose a risk by direct or indirect contact with raw materials, intermediate and finished products, such as lubricating oil, shall be food grade.	Y
4.7.6	Engineering workshops shall be kept clean and tidy and controls shall be in place to prevent contamination risks to the product (e.g. provision of swarf mats at the entrance/exit of workshops).	Y
4.8	Staff facilities	
Staff facilities are well equipped. Sufficient number of lockers for personal clothing and items. Clean work wear, white trousers and coats, are stored in a separate room. Hand washing and disinfection and shoe brushes available with appropriate capacity, in the hygiene corridor at the entrance of the production area. Different colour of hairnets are used for staff identification. It is not allowed to wear the white coat outside the production area to prevent any contamination caused by lunch or office work. All required aspects are correctly implemented. Catering is not outsourced by own personnel with no limitations to recipes or ingredients. No high risk or high care operations. No deviations seen during audit.		
Statement of Intent	Staff facilities shall be sufficient to accommodate the required number of personnel, and shall be designed and operated to minimise the risk of product contamination. The facilities shall be maintained in good and clean condition.	Y

4.8.1	Designated changing facilities shall be provided for all personnel, whether staff, visitor or contractor. These shall be sited to allow direct access to the production, packing or storage areas without recourse to any external area. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly (e.g. the provision of cleaning facilities for footwear).	Y
4.8.2	Storage facilities of sufficient size to accommodate personal items shall be provided for all personnel who work in raw material handling, preparation, processing, packing and storage areas.	Y
4.8.3	Outdoor clothing and other personal items shall be stored separately from workwear within the changing facilities. Facilities shall be available to separate clean and dirty workwear.	Y
4.8.4	Where an operation includes a **high-care area**, personnel shall enter via a specially designated changing facility with arrangements to ensure that protective clothing will not be contaminated before entry to the high-care area. The changing facilities shall incorporate the following requirements: • clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing • dedicated footwear, by exception shoe coverings shall be provided for visitors only to be worn in the high-care area • an effective system shall be provided to segregate areas for wearing high-care from other footwear (e.g. a barrier or bench system) or there shall be an effective boot wash on entrance to the high-care area • protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care area • hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing • on entry to high-care areas,hand-washing and disinfection shall be provided.	Na
4.8.5	Where an operation includes a **high-risk area**, personnel shall enter via a specially designated changing facility at the entrance to the high-risk area. The changing facilities shall include the following requirements: • clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing • dedicated footwear shall be provided to be worn in the high-risk area • an effective system shall be provided to segregate areas for wearing high-risk and other footwear, e.g. a barrier or bench system • protective clothing shall be visually distinctive from that worn in other areas and shall not be worn outside of the high-risk area • hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing • on entry to high-risk areas, hand-washing and disinfection shall be provided.	Na

4.8.6	Suitable and sufficient hand-washing facilities shall be provided at access to, and at other appropriate points within, production areas. Such hand-wash facilities shall provide as a minimum: • sufficient quantity of water at a suitable temperature • liquid soap • single use towels or suitably designed and located air driers • water taps with hand-free operation • advisory signs to prompt hand-washing.	Y
4.8.7	Toilets shall be adequately segregated and shall not open directly into production, packing and storage areas. Toilets shall be provided with hand-washing facilities comprising: • basins with soap and water at a suitable temperature • adequate hand-drying facilities • advisory signs to prompt hand-washing. Where hand-washing facilities within toilet facilities are the only facilities provided before re-entering production, the requirements of 4.8.6 shall apply and signs shall be in place to direct people to hand-wash facilities before entering production.	Y
4.8.8	Where smoking is allowed under national law, designated controlled smoking areas shall be provided which are both isolated from production areas to an extent that ensures smoke cannot reach the product and fitted with sufficient extraction to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall be provided at smoking facilities, both inside and at exterior locations.	Y
4.8.9	All food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas. Where eating of food is allowed outside during breaks, this shall be in suitable designated areas with appropriate control of waste.	Y
4.8.10	Where catering facilities are provided on the premises, they shall be suitably controlled to prevent contamination of product (e.g. as a source of food poisoning or introduction of allergenic material to the site).	Y
4.9	**Chemical and physical product contamination control** **Raw material handling, preparation, processing, packing and storage areas**	

All chemicals used are listed. All chemicals are stored in a separate secured room.
To prevent metal contamination a procedure for knife use is present, P-RGR-NL-10122, controlled by from F-RGR-NL-10110 for each knife set that is given for the use in production. Metal detectors are in place at the end of each packing line. Metal detectors are CP's according the HACCP analysis, but are controlled as CCP. Some products are packed into an aluminium tray. A metal detector before packing checks these products.
The state of all glass and hard plastic is controlled by two monthly checks by QA according a glass

register F-RGR-NL-10028, weekly checks by production QA, F-RGR-NL-10002 and daily line checks before commencing work by production, F-RGR-NL-10025. Wood is only used in the expedition and storages. No wood seen in production during audit.		
Statement of Intent	Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.	Y
4.9.1	**Chemical control**	
4.9.1.1	Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These shall include as a minimum: • an approved list of chemicals for purchase • availability of material safety data sheets and specifications • confirmation of suitability for use in a food processing environment • avoidance of strongly scented products • the labelling and/or identification of containers of chemicals at all times • segregated and secure storage with restricted access to authorised personnel • use by trained personnel only.	Y
4.9.1.2	Where strongly scented or taint-forming materials have to be used, for instance for building work, procedures shall be in place to prevent the risk of taint contamination of products.	Y
4.9.2	**Metal control**	
4.9.2.1	There shall be a documented policy for the control of the use of sharp metal implements including knives, cutting blades on equipment, needles and wires. This shall include a record of inspection for damage and the investigation of any lost items. Snap-off blade knives shall not be used.	Y
4.9.2.2	The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided. Staples and paper clips shall not be used in open product areas. Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination.	Y
4.9.3	**Glass, brittle plastic, ceramics and similar materials**	
4.9.3.1	Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination.	Y
4.9.3.2	Documented procedures for handling glass and other brittle materials shall be in place and implemented to ensure that necessary precautions are taken. Procedures shall include as a minimum: • a list of items detailing location, number, type and condition	Y

	• recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product • details on cleaning or replacing items to minimise potential for product contamination.	
4.9.3.3	Documented procedures detailing the action to be taken in case of breakage of glass or other brittle items shall be implemented and include the following: • quarantining the products and production area that were potentially affected • cleaning the production area • inspecting the production area and authorising to continue production • changing of workwear and inspection of footwear • specifying those staff authorised to carry out the above points • recording the breakage incident.	Y
4.9.3.4	**Products packed into glass or other brittle containers**	
4.9.3.4.1	The storage of the containers shall be segregated from the storage of raw materials, product or other packaging.	Na
4.9.3.4.2	Systems shall be in place to manage container breakages between the container cleaning/inspection point and container closure. This shall include, as a minimum, documented instructions which ensure: • the removal and disposal of at-risk products in the vicinity of the breakage; this may be specific for different equipment or areas of the production line. • the effective cleaning of the line or equipment which may be contaminated by fragments of the container. Cleaning shall not result in the further dispersal of fragments, for instance by the use of high pressure water or air. • the use of dedicated, clearly identifiable cleaning equipment (e.g. colour coded) for removal of container breakages. Such equipment shall be stored separately from other cleaning equipment. • the use of dedicated, accessible lidded waste containers for the collection of damaged containers and fragments. • a documented inspection of production equipment is undertaken following the cleaning of a breakage to ensure cleaning has effectively removed any risk of further contamination. • authorisation is given for production to re-start following cleaning. • the area around the line is kept clear of broken glass.	Na
4.9.3.4.3	Records shall be maintained of all container breakages on the line. Where no breakages have occurred during a production period, this shall also be recorded. This record shall be reviewed to identify trends and potential line or container improvements.	Na
4.9.4	**Wood**	
4.9.4.1	Wood should not be used in open product areas except where this is a process requirement (e.g. maturation of products in wood). Where the use of	Y

	wood cannot be avoided, the condition of wood shall be continually monitored to ensure it is in good condition and free from damage or splinters which could contaminate products.	
4.10	**Foreign body detection and removal equipment**	
For the removal of potential foreign bodies metal detectors are in place at the end of each packaging line. Accuracies are Fe 3,5 mm, nonFe 4,0 mm and SS 304 4,0 mm. The metal detectors are tested 4x/day, including the end of production, by using test pieces according the accuracies described. During audit the test procedure is demonstrated and shows to be efficient. Product detected is blown out of the production line into a closed box, which is only allowed to open by the line responsible employee and the TOG (techn. line operator). No magnets, sieves, X ray or optical sorters in place.		
Statement of intent	The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies.	Y
4.10.1	**Foreign body detection and removal equipment**	
4.10.1.1	A documented assessment in association with the HACCP study shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign body contamination. Typical equipment to be considered may include: • filters • sieves • metal detection • magnets • optical sorting equipment • X-ray detection equipment • other physical separation equipment e.g. gravity separation, fluid bed technology.	Y
4.10.1.2	The type, location and sensitivity of the detection and/or removal method shall be specified as part of the company's documented system. Industry best practice shall be applied with regard to the nature of the ingredient, material, product and/or the packed product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified.	Y
4.10.1.3	The company shall ensure that the frequency of the testing of the foreign body detection and/or removal equipment is defined and takes into consideration: • specific customer requirements • the company's ability to identify, hold and prevent the release of any affected materials, should the equipment fail.	Y
4.10.1.4	Where foreign material is detected or removed by the equipment, the source of any unexpected material shall be investigated. Information on rejected materials shall be used to identify trends and where possible instigate preventive action to reduce the occurrence of contamination by the foreign material.	Y

4.10.2	Filters and sieves	
4.10.2.1	Filters and sieves used for foreign body control shall be of a specified mesh size or gauge and designed to provide the maximum practical protection for the product. Material retained or removed by the system shall be examined and recorded to identify contamination risks.	Na
4.10.2.2	Filters and sieves shall be regularly inspected or tested for damage on a documented frequency based on risk. Records shall be maintained of the checks. Where defective filters or sieves are identified this shall be recorded and the potential for contamination of products investigated and appropriate action taken.	Na
4.10.3	Metal detectors and X-ray equipment	
4.10.3.1	Metal detection equipment shall be in place unless risk assessment demonstrates that this does not improve the protection of final products from metal contamination. Where metal detectors are not used justification shall be documented. The absence of metal detection would only normally be based on the use of an alternative, more effective, method of protection (e.g. use of X-ray, fine sieves or filtration of products).	Y
4.10.3.2	Where metal detectors or X-ray equipment is used, this shall be situated at the latest practical step in the process flow and, wherever possible, after the product has been packaged.	Y
4.10.3.3	The metal detector or X-ray equipment shall incorporate one of the following: • an automatic rejection device, for continuous in-line systems, which shall either divert contaminated product out of the product flow or to a secure unit accessible only to authorised personnel • a belt stop system with an alarm where the product cannot be automatically rejected, e.g. for very large packs • in-line detectors which identify the location of the contaminant shall be operated to allow effective segregation of the affected product.	Y
4.10.3.4	The company shall establish and implement documented procedures for the operation and testing of the metal or X-ray equipment. This shall include as a minimum: • responsibilities for the testing of equipment • the operating effectiveness and sensitivity of the equipment and any variation to this for particular products • the methods and frequency of checking the detector • recording of the results of checks.	Y
4.10.3.5	Metal detector checking procedures shall be based on best practice and shall as a minimum include:	Y

	• use of test pieces incorporating a sphere of metal of a known diameter. The test pieces shall be marked with the size and type of test material contained. • tests carried out using separate test pieces containing ferrous metal, stainless steel and typically non-ferrous metal, unless the product is within a foil container. • a test that both the detection and rejection mechanisms are working effectively under normal working conditions. • checks that test the memory/reset function of the metal detector by passing successive test packs through the unit. In addition, where metal detectors are incorporated on conveyors: • the test piece shall be passed as close as possible to the centre of the metal detector aperture and wherever possible be carried out by inserting the test piece within a clearly identified sample pack of the food being produced at the time of the test. Where in-line metal detectors are used the test piece shall be placed in the product flow wherever this is possible.	
4.10.3.6	The company shall establish and implement corrective action and reporting procedures in the event of the testing procedure identifying any failure of the foreign body detector. Action shall include a combination of isolation, quarantining and re-inspection of all product produced since the last successful test.	Y
4.10.4	**Magnets**	
4.10.4.1	The type, location and the strength of magnets shall be fully documented. Documented procedures shall be in place for the inspection, cleaning, strength testing and integrity checks. Records of all checks shall be maintained.	Na
4.10.5	**Optical sorting equipment**	
4.10.5.1	Each unit shall be checked in accordance with the manufacturer's instructions or recommendations. Checks shall be documented.	Na
4.10.6	**Container cleanliness – glass jars, cans and other rigid containers**	
4.10.6.1	Based on risk assessment, procedures shall be implemented to minimise foreign body contamination originating with the packaging container (e.g. jars, cans and other preformed rigid containers). This may include the use of covered conveyors, container inversion and foreign body removal through rinsing with water or air jets.	na
4.10.6.2	The effectiveness of the container cleaning equipment shall be checked and recorded during each production. Where the system incorporates a rejection system for dirty or damaged containers, the check shall incorporate a test of	na

	both the detection and effective rejection of the test container.	
4.11	**Housekeeping and hygiene**	
Cleaning is carried out by an external company ( ). Some cleaning is performed by own personnel. All cleaning is scheduled in a cleaning plan, covering equipment, chemicals used and cleaning frequencies. The effectiveness of cleaning is checked visually before commencing work by production QA, F-RGR-NL-10025, and signed for. If the cleaning is inappropriate, corrective actions are taken and is informed for preventive actions. The effectiveness of cleaning and residues is checked by QA visually and by swabbing, records made on F-RGR-NL-10097. Limits are defined. No CIP cleaning used. Minor NC 6: Floor in QA office and door in central corridor and hand dryers in the hygiene corridor is dirty and not cleaned for a longer time.		
FUNDAMENTAL Statement of Intent	Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimised.	Y
4.11.1	Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures shall as a minimum include the: • responsibility for cleaning • item/area to be cleaned • frequency of cleaning • method of cleaning, including dismantling equipment for cleaning purposes where required • cleaning chemicals and concentrations • cleaning materials to be used • cleaning records and responsibility for verification. The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure appropriate standards of cleaning are achieved.	Y
4.11.2	Limits of acceptable and unacceptable cleaning performance shall be defined, based on the potential hazards (e.g. microbiological, allergen or foreign body contamination). Acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see Glossary), microbiological testing or chemical testing as appropriate. The cleaning and disinfection procedures and frequency shall be validated and records maintained.	Y
4.11.3	The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning.	Y

4.11.4		The cleanliness of equipment shall be checked before equipment is released back into full production. The results of checks on cleaning, including visual, analytical and microbiological checks, shall be recorded and used to identify trends in cleaning performance and instigate improvements where required.	N
4.11.5		Cleaning equipment shall be: • fit for purpose • suitably identified for intended use, e.g. colour coded or labelled • cleaned and stored in a hygienic manner to prevent contamination. Equipment used for cleaning in high-care and high-risk areas shall be dedicated for use in that area.	Y
4.11.6		Cleaning in place (CIP)	
4.11.6.1		Cleaning-in-place (CIP) facilities, where used, shall be monitored and maintained to ensure their effective operation.	Na
4.11.6.2		A schematic plan of the layout of the CIP system shall be available. There shall be an inspection report or other verification that: • systems are hygienically designed with no dead areas, limited interruptions to flow streams and good system drain ability. • scavenge pumps are operated to ensure that there is no build-up of cleaning fluids in the vessels. • spray balls effectively clean vessels by providing full surface coverage and are periodically inspected for blockages. Rotating spray devices should have a defined operational time. • CIP equipment has adequate separation from active product lines, e.g. through the use of double seat valves, manually controlled links or blanks in pipework. The system shall be revalidated following alterations or additions to the CIP equipment. A log of changes to the CIP system shall be maintained.	na
4.11.6.3		The CIP equipment shall be operated to ensure effective cleaning is carried out: • The process parameters, time, detergent concentrations, flow rate and temperatures shall be defined to ensure removal of the appropriate target hazard, e.g. soil, allergens, vegetative microorganisms, spores. This shall be validated and records of the validation maintained. • Detergent concentrations shall be checked routinely. • Process verification shall be undertaken by analysis of rinse waters and/or first product through the line for the presence of cleaning fluids or by tests of ATP (bioluminescence techniques) allergens or micro-organisms as appropriate. • Detergent tanks shall be kept stocked up and a log maintained of when these are filled and emptied. Recovered pre-rinse solutions shall be monitored for a build-up of carry-over from the detergent tanks. • Filters, where fitted, shall be cleaned and inspected at a defined	Na

	frequency.	
4.12	**Waste/waste disposal**	
Waste is collected separately in a separated area. The collection of waste is done by a contracted companies (for rest waste and for Cat 2 and Cat 3). All waste is clearly identified (bins and cat 3 crates).		
Statement of Intent	Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.	Y
4.12.1	Where licensing is required for the disposal of categorised waste, it shall be removed by licensed contractors and records of disposal shall be maintained and available for audit.	Y
4.12.2	Food products intended to be supplied for animal feed shall be segregated from waste and managed in accordance with relevant legislative requirements.	Y
4.12.3	External waste collection containers and rooms housing waste facilities shall be managed to minimise risk. These shall be: • clearly identified • designed for ease of use and effective cleaning • well-maintained to allow cleaning and, where required, disinfection • emptied at appropriate frequencies • covered or doors kept closed as appropriate.	Y
4.12.4	If unsafe products or substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in secure product or waste disposal and shall provide records which includes the quantity of waste collected for destruction or disposal.	Y
4.13	**Pest control**	
The pest control is managed by contractor successor of who was the contracter until 30-06-2014. Visit frequency: 8x/year routine visits; 1x/year QA inspection, 4x/year counting and maintenance. All required aspects are present in the programme. Online log is available as well as online correspondence on actions and corrections. Risk class is indicated as "low". After the indepth survey. Outside are relatively many bait stations because of activities of neighbours which are acknowledged.		
Statement of Intent	The whole site shall have an effective preventive pest control programme in place to minimise the risk of infestation and there shall be the resources available to rapidly respond to any issues which occur to prevent risk to products.	Y
4.13.1	The company shall either contract the services of a competent pest control organisation, or shall have appropriately trained staff, for the regular inspection and treatment of the site to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and shall be documented. Where the services of a pest control contractor are employed,	Y

	the service contract shall be clearly defined and reflect the activities of the site.	
4.13.2	Where a company undertakes its own pest control, it shall be able to effectively demonstrate that: • pest control operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site • sufficient resources are available to respond to any infestation issues • there is ready access to specialist technical knowledge when required • legislation governing the use of pest control products is understood • dedicated locked facilities are used for the storage of pesticides.	Y
4.13.3	Pest control documentation and records shall be maintained. This shall include as a minimum: • an up-to-date plan of the full site identifying numbered pest control device locations • identification of the baits and/or monitoring devices on site • clearly defined responsibilities for site management and for the contractor • details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies • any observed pest activity • details of pest control treatments undertaken.	Y
4.13.4	Bait stations shall be robust, of tamper resistant construction, secured in place and appropriately located to prevent contamination risk to product. Missing bait boxes shall be recorded, reviewed and investigated. Toxic rodent baits shall not be used within production areas or storage areas where open product is present except when treating an active infestation.	y
4.13.5	Fly-killing devices and/or pheromone traps shall be correctly sited and operational. If there is a danger of insects being expelled from a fly-killing extermination device and contaminating the product, alternative systems and equipment shall be used.	Y
4.13.6	In the event of infestation, or evidence of pest activity, immediate action shall be taken to eliminate the hazard. Any potentially affected products should be subject to the non-conforming product procedure.	Y
4.13.7	Records of pest control inspections, pest proofing and hygiene recommendations and actions taken shall be maintained. It shall be the responsibility of the company to ensure all of the relevant recommendations made by their contractor or in-house expert are carried out in a timely manner.	Y

4.13.8	An in-depth, documented pest control survey shall be undertaken at a frequency based on risk, but typically quarterly, by a pest control expert to review the pest control measures in place. The timing of the survey shall be such as to allow access to equipment for inspection where a risk of stored product insect infestation exists.	Y
4.13.9	Results of pest control inspections shall be assessed and analysed for trends on a regular basis, but as a minimum: • in the event of an infestation • annually This shall include a catch analysis from trapping devices to identify problem areas. The analysis shall be used as a basis for improving the pest control procedures.	Y
4.14	**Storage facilities**	
Several storages are used: ambient for packaging and additives and cooling and freezing storages. controls temperatures of cooled and freezing storages. Storage temperatures are analysed as a CP, not as a CCP. An employee (sweeper) is responsible for the flow out of the incoming storages into production to maintain correct fifo and batch identification. In freezing cell limited/no frost was seen and all products were identified and closed.		
Statement of Intent	All facilities used for the storage of ingredients, in-process product and finished products shall be suitable for its purpose.	Y
4.14.1	Documented procedures to maintain product safety and quality during storage shall be developed on the basis of risk assessment, understood by relevant staff and implemented accordingly. These may include as appropriate: • managing chilled and frozen product transfer between temperature controlled areas • segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake • storing materials off the floor and away from walls • specific handling or stacking requirements to prevent product damage.	Y
4.14.2	Where temperature control is required, the storage area shall be capable of maintaining product temperature within specification and operated to ensure specified temperatures are maintained. Temperature recording equipment with suitable temperature alarms shall be fitted to all storage facilities or there shall be a system of recorded manual temperature checks, typically on at least a four-hourly basis or at a frequency which allows for intervention before product temperatures exceed defined limits for the safety, legality or quality of products.	Y
4.14.3	Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the	na

	storage conditions.	
4.14.4	Where storage outside is necessary, items shall be protected from contamination and deterioration.	Y
4.14.5	Receipt documents and/or product identification shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life.	Y
4.15	**Dispatch and transport**	
The dispatch and transport is organised by procedure P-RGR-NL-10090 and 10079. At dispatch the product temperature is checked with a calibrated thermometer 10067, nr 70 calibrated until 13-11-2014. Records of dispatch are made: date and time of loading, name of transporter, destination, truck sign, hygienic state of truck and temperature truck. Temperature limit is max 4 °C. No deviations seen.		
Statement of Intent	Procedures shall be in place to ensure that the management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety or quality of the products.	Y
4.15.1	Documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include as appropriate: • controlling temperature of loading dock areas • the use of covered bays for vehicle loading or unloading • securing loads on pallets to prevent movement during transit • inspection of loads prior to dispatch.	Y
4.15.2	Traceability shall be ensured during transportation. There shall be a clear record of dispatch and receipt of goods and materials demonstrating that sufficient checks have been completed during the transfer of goods.	Y
4.15.3	All vehicles or containers used for the dispatch of products shall be inspected prior to loading to ensure that they are fit for purpose. This shall ensure that they are: • in a suitably clean condition • free from strong odours which may cause taint to products • suitably maintained to prevent damage to products during transit • equipped to ensure any temperature requirements can be maintained. Records of inspections shall be maintained.	Y
4.15.4	Where temperature control is required, the transport shall be capable of maintaining product temperature within specification, under minimum and maximum load. Temperature data-logging devices which can be interrogated to confirm time/temperature conditions or a system to verify and record at	Y

	predetermined frequencies the correct operation of refrigeration equipment shall be used and records maintained.	
4.15.5	Maintenance systems and documented cleaning procedures shall be maintained for all vehicles and equipment used for loading/unloading (e.g. hoses connecting to silo installations). There shall be records of the measures taken.	Y
4.15.6	The company shall have documented procedures for the transport of products, which shall include: • any restrictions on the use of mixed loads • requirements for the security of products during transit, particularly when vehicles are parked and unattended • clear instructions in the case of vehicle breakdown, accident or failure of refrigeration systems which ensure the safety of the products is assessed and records maintained.	Y
4.15.7	Where the company employs third-party contractors, all the requirements specified in this section shall be clearly defined in the contract and verified or the contracted company shall be certificated to the Global Standard for Storage and Distribution or similar internationally recognised Standard.	Y

5. Product control

5.1 Product design/development

Product development is controlled by checklist F-Retail-10005. Seen development records of Schnitzels themaweken dated 20-08-2014 up until the introduction of new specifications.
Change control for HACCP is part of the checklist F-NLFOOD-110037.
Claims are adressed by colouring of packaging and predictated packaging as described in specifications.
No deviations seen.

Statement of Intent	Product design and development procedures shall be in place for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced.	Y
5.1.1	The company shall provide clear guidelines on any restrictions to the scope of new product developments to control the introduction of hazards which would be unacceptable to the company or customers (e.g. the introduction of allergens, glass packaging or microbiological risks).	Y
5.1.2	All new products and changes to product formulation, packaging or methods of processing shall be formally approved by the HACCP team leader or authorised HACCP committee member. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system,	Y

	are implemented. This approval shall be granted before products are introduced into the factory environment.	
5.1.3	Trials using production equipment shall be carried out where it is necessary to validate that product formulation and manufacturing processes are capable of producing a safe product of the required quality.	Y
5.1.4	Shelf-life trials shall be undertaken using documented protocols reflecting conditions experienced during storage and handling. Results shall be recorded and retained and shall confirm compliance with relevant microbiological, chemical and organoleptic criteria. Where shelf-life trials prior to production are impractical, for instance for some long-life products, a documented science-based justification for the assigned shelf life shall be produced.	Y
5.1.5	All products shall be labelled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe.	Y
5.1.6	Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutritional claim, reduced sugar), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.	na
5.2	Management of allergens	
Allergens are managed by procedure P-RGR-10113. Based on an allergen matrix, the production is scheduled. The products with the same allergens are planned together. If allergens are present which can contaminate the product next in line measurements are taken: new hand shoes, sleeves and aprons, the line will be cleaned dry and for some machines the machines are flushed with product before production or packing starts. Measurements are based on an allergen residue validation plan, dated 300913. Rework is used in the meat preparation department, identifying allergens. During audit production schedules seen. In the storage department are the additives with allergic component stored at the bottom to prevent contamination is case of package breakage. Each employee takes an e-learning course at the start. Allergens are part of this course. No deviations seen.		
FUNDAMENTAL Statement of Intent	The company shall have a developed system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling.	Y
5.2.1	The company shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens (refer to glossary). This shall include review of raw material specifications and, where required, obtain additional information from suppliers, for example through questionnaires to	Y

	understand the allergen status of the raw material, its ingredients and the factory in which it is produced.	
5.2.2	The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products and any new product development ingredients or products.	Y
5.2.3	A documented risk assessment shall be carried out to identify routes of contamination and establish documented policies and procedures for handling raw materials, intermediate and finished products to ensure cross-contamination is avoided. This shall include: • consideration of the physical state of the allergenic material, i.e. powder, liquid, particulate • identification of potential points of cross-contamination through the process flow • assessment of the risk of allergen cross-contamination at each process step • identification of suitable controls to reduce or eliminate the risk of cross-contamination.	Y
5.2.4	Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination into products not containing the allergen. This shall include as appropriate: • physical or time segregation whilst allergen-containing materials are being stored, processed or packed • the use of separate or additional protective over clothing when handling allergenic materials • use of identified, dedicated equipment and utensils for processing • scheduling of production to reduce changes between products containing an allergen and products not containing the allergen • systems to restrict the movement of airborne dust containing allergenic material • waste handling and spillage controls • restrictions on food brought onto site by staff, visitors, contractors and for catering purposes.	Y
5.2.5	Where rework is used, or reworking operations carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.	Y
5.2.6	Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning shall be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.	Y
5.2.7	Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the company shall ensure that the production process is	na

	fully validated to meet the stated claim. This shall be documented.	
5.2.8	Equipment or area cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated to ensure they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.	Y
5.2.9	All relevant personnel, including engineers, temporary staff and contractors, shall have received general allergen awareness training and be trained in the company's allergen-handling procedures.	Y
5.2.10	An effective system of documented checks shall be in place at line start-up, following product changeover and changes in batches of packaging to ensure that the labels applied are correct for the products packed.	Y
5.3	**Provenance, assured status and claims of identity preserved materials**	
Production and packing of organic products ( ) and BLK products. All received material is inspected, procedure P-RGR-NL-10034. Records made for meat: date and time of receiving, supplier name, EG no, truck sign, truck hygiene, meat authenticity, meat status and temperature. Temperature measurement of all cooled raw material received is a CCP. These products are strictly separated, based on the existing batch identification system and planning scheduling system based on allergen management system. To visualize the different status of product, the regular, organic and BLK meat is identified by coloured liners: blue = regular meat, green = organic meat, orange = BLK meat, from receiving until packing. Weekly the product flow of organic and BLK meat is tested for correct status handling of the meat, by calculation of the mass balance. During audit no deviations seen.		
Statement of Intent	Systems of traceability, identification and segregation of raw materials, intermediate and finished products shall be in place to ensure that all claims relating to provenance or assured status can be substantiated.	Y
5.3.1	Where claims are to be made on finished packs about the provenance, assured or 'identity preserved' status (see Glossary) of raw materials used, the status of each batch of the raw material shall be verified and records maintained.	Y
5.3.2	Where a claim is made relating to the provenance, assured or identity preserved status of a product or ingredient, the facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims. The company shall undertake documented mass balance tests at least every six months and at a frequency to meet the particular scheme requirements.	Y
5.3.3	The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims.	Y

5.4	Product Packaging	
The products are packed into plastic trays and under MAP packing sealed with a top seal. Some products contain an aluminium tray within the MAP packing, for consumer use in the oven. Other products are packing into bulk: a plastic crate with a coloured liner (colour based on status of the product). All packing material used is food applicable. Supplier specifications and migration statements and reports are present. All packing material is stored separately and packed. Minor NC 7: Not legitimate use of primary packaging material in Maintenance and production department.		
Statement of Intent	Product packaging shall be appropriate for the intended use and shall be stored under conditions to minimise contamination and deterioration.	Y
5.4.1	When purchasing or specifying food contact packaging the supplier of packaging materials shall be made aware of any particular characteristics of the food (e.g. high fat content, pH or usage conditions such as microwaving) which may affect packaging suitability. Certificates of conformity or other evidence shall be available for product packaging to confirm it conforms to relevant food safety legislation and is suitable for its intended use.	Y
5.4.2	Where appropriate, packaging shall be stored away from raw materials and finished product. Any part-used packaging materials suitable for use shall be effectively protected from contamination and clearly identified before being returned to an appropriate storage area. Obsolete packaging shall be stored in a separate area and systems shall be in place to prevent accidental use.	N
5.4.3	Product contact liners (or raw material/work-in-progress contact liners) purchased by the company shall be appropriately coloured and resistant to tearing to prevent accidental contamination.	Y
*5.5	Product inspection and laboratory testing	
Products are inspected during production on foreign bodies (metal detection) and on temperature. Products are checked for microbiological values based on a monitoring program advised by central VION QA. (P-RGR-NL-10000 dated 22-09-2014) for TPC, E-coli, enterobacteriacea listeria and salmonella. Results are monitored as a KPI on a weekly basis. (minor nc H1). Products are also tested for shelf life. Seen test of marinated maet shelf life 14 days, on day 14 log 6 (TPC) was just enough. All test results are logged on Quality Trends on VIONline and analysed for trends. No laboratory on site. Microbiological tests are done by , accreditation		
Statement of Intent	The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.	Y
5.5.1	Product inspection and testing	
5.5.1.1	There shall be a scheduled programme of testing covering products and the processing environment which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented.	Y

5.5.1.2	Test and inspection results shall be recorded and reviewed regularly to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	Y
5.5.1.3	The company shall ensure that a system of on-going shelf-life assessment is in place. This shall be based on risk and shall include microbiological and sensory analysis as well as relevant chemical factors such as pH and aw. Records and results from shelf life tests shall validate the shelf life period indicated on the product.	Y
5.5.2	**Laboratory testing**	
5.5.2.1	Pathogen testing shall be subcontracted to an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the manufacturing site and have operating procedures to prevent any risk of product contamination.	Y
5.5.2.2	Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. Controls shall be documented, implemented and shall include consideration of the following: • design and operation of drainage and ventilation systems • access and security of the facility • movement of laboratory personnel • protective clothing arrangements • processes for obtaining product samples • disposal of laboratory waste.	Y
5.5.2.3	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. Documented justification shall be available where accredited methods are not undertaken.	Y
5.5.2.4	Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in 5.5.2.3. These shall include: • use of recognised test methods, where available • documented testing procedures • ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required • use of a system to verify the accuracy of test results, e.g. ring or proficiency testing • use of appropriately calibrated and maintained equipment.	Y
5.6	**Product release**	
During production products are checked according procedures and sampling plans. If all checks proves the products are within specification, the product is released for shipment. Blocked product can only be		

released by the QA manager.

For incoming cooked meats only to be packed a product release procedure is recently developed following the preventive measures after the withdrawal in june 2104.

Minor NC 8: A positive release is available for heated to be reheated products. No documented procedure is available.

After the audit and after the rca deriving from this minor the company has decided to stop with this category of product.

Statement of Intent	The company shall ensure that finished product is not released unless all agreed procedures have been followed.	Y
5.6.1	Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and release authorised.	N

6. Process Control

6.1 Controls of operations

Products are produced according production schedule. For each product an internal product specification is present, containing all relevant product and packaging requirements (customer, HACCP, process). Product checks are done according procedures and sampling plan (before commencing work, at receiving, during production, packing and storage and at shipment). For composited products recipes are available, recorded and controlled by the system, with barcoding. The system is secured in case of mistakes at raw material handling, the system then blocks the operation. Rework is also scanned and in view op operations. For each measurement limits are clear. Corrective actions are recorded. Each recorded form is signed by the responsible department foreman.

Minor NC 9: Specification of 55075 (Hamlappen 600x4) is not available in production while being produced.

FUNDAMENTAL Statement of Intent	The company shall operate to documented procedures and/or work instructions that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan.	Y
6.1.1	Documented process specifications and work instructions shall be available for the key processes in the production of products to ensure product safety, legality and quality. The specifications as appropriate shall include: • recipes – including identification of any allergens • mixing instructions, speed, time • equipment process settings • cooking times and temperatures • cooling times and temperatures • labelling instructions • coding and shelf life marking	N

	• any additional critical control points identified in the HACCP plan.	
6.1.2	Process monitoring, such as of temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification.	Y
6.1.3	In circumstances where process parameters are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested.	Y
6.1.4	Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated at a frequency based on risk and performance of equipment (e.g. heat distribution in retorts, ovens and processing vessels; temperature distribution in freezers and cold stores).	Y
6.1.5	In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken.	Y
6.1.6	Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleaned and are ready for production. Documented checks shall be carried out at product changes to ensure all products and packaging from the previous production have been removed from the line before changing to the next production.	Y
6.1.7	Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks at the start of packing, during the packaging run, following packaging changes and when changing batches of packaging materials, in order to ensure that correct packaging materials are used. The procedures shall also include verification of any code information or other printing carried out at the packing stage.	Y
6.2	**Quantity-weight, volume and number control**	
The internal specifications describes the weight system that must be used: e-weight or nominal weight. Records of weights are made automatically by check-weighers. E-weighing is granted by Dutch authorities and give- away levels are monitored as seen during the tracetest during the audit. No deviations seen during audit.		
Statement of Intent	The company shall operate a quantity control system which conforms to legal requirements in the country where the product is sold and any additional industry sector codes or specified customer requirement.	Y
6.2.1	The frequency and methodology of quantity checking shall meet the requirements of appropriate legislation governing quantity verification, and	Y

	records of checks shall be maintained.	
6.2.2	Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer requirements and records shall be maintained.	Y
6.3	**Calibration and control of measuring and monitoring devices**	
Calibration is organized by the maintenance department and the QA department (external services). According procedure P-RGR-NL-10024 all measuring devices must be calibrated. All measuring devices for calibration are listed. Calibration is recorded on F-RGR-NL-10060. Calibration of thermometers at receiving (CCP) nr 80 and dispatch nr 70 are calibrated 1x/year.		
Statement of intent	The company shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.	Y
6.3.1	The company shall identify and control measuring equipment used to monitor CCPs, product safety and legality. This shall include as a minimum: • a documented list of equipment and its location • an identification code and calibration due date • prevention from adjustment by unauthorised staff • protection from damage, deterioration or misuse.	Y
6.3.2	All identified measuring devices, including new equipment, shall be checked and where necessary adjusted: • at a predetermined frequency, based on risk assessment • to a defined method traceable to a recognised national or international Standard where possible. Results shall be documented. Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform.	Y
6.3.3	Reference measuring equipment shall be calibrated and traceable to a recognised national or international Standard and records maintained.	Y
6.3.4	Procedures shall be in place to record actions to be taken when the prescribed measuring and monitoring devices are found not to be operating within specified limits. Where the safety or legality of products is based on equipment found to be inaccurate, action shall to be taken to ensure at-risk product is not offered for sale.	Y

7. Personnel

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

All personnel -including temporary personnel- is trained before commencing work by an introduction book (dated 2011-2012) and an e-learning (in all languages), containing safety, HACCP, hygiene rules, identification mandatory and BSN registration. New employees have to sign for reading and understanding the rules. Seen of employee Also all employees must be screened for health. Seen ID's, training records and health records.
CCP training is organised by QA, records seen for all receiving employee and , dd 03-05-12 on P-RGR-NL-10076 dated 19-12-2012.
Temporary personnel agencies are listed and must be VRO certificated. Three agencies are approved at this moment: , and
A yearly training budget plan is made for 2014 in 2013. For 2015 in the (concept) plan is included education on low literacy, which is also addressed in the objectives of the company.

FUNDAMENTAL Statement of intent	The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification.	Y
7.1.1	All relevant personnel, including temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.	Y
7.1.2	Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place.	Y
7.1.3	The company shall put in place documented programmes covering the training needs of relevant personnel. These shall include as a minimum: • identifying the necessary competencies for specific roles • providing training or other action to ensure staff have the necessary competencies • reviewing the effectiveness of training • the delivery of training in the appropriate language of trainees.	Y
7.1.4	Records of all training shall be available. This shall include as a minimum: • the name of the trainee and confirmation of attendance • the date and duration of the training • the title or course contents, as appropriate • the training provider. Where training is undertaken by agencies on behalf of the company, records of the training shall be available.	Y
7.1.5	The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.	Y

7.2	Personal hygiene Raw material handling, preparation, processing, packing and storage areas	
Hygiene rules are described in P-FOOD-10017. Rules are equal to all employees, contactors and visitors. All required aspects are addressed. Blisters are blue and metal detectable even as writing material to be brought into production. The effectiveness is verified weekly within the cleaning verification swabbing, F-RGR-NL-10097. No deviations seen during audit.		
Statement of intent	The company's personal hygiene standards shall be appropriate to the products produced, documented, and adopted by all personnel, including agency staff, contractors and visitors to the production facility.	Y
7.2.1	The requirements for personal hygiene shall be documented and communicated to all personnel. This shall include as a minimum the following requirements: • Watches shall not be worn. • Jewellery shall not be worn, with the exception of a plain wedding ring or wedding wristband. • Rings and studs in exposed parts of the body, such as ears, noses, tongues and eyebrows, shall not be worn. • Fingernails shall be kept short, clean and unvarnished. False fingernails shall not be permitted. • Excessive perfume or aftershave shall not be worn. Compliance with the requirements shall be checked routinely.	Y
7.2.2	Hand cleaning shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	Y
7.2.3	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue) and containing a metal detectable strip. These shall be company issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn.	Y
7.2.4	Where metal detection equipment is used, a sample from each batch of plasters shall be successfully tested through the equipment and records shall be kept.	Y
7.2.5	Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimise the risk of product contamination.	Y
7.3	Medical screening	
New employees, including temporary employees, are screened on health (have to comply and state that diseases are absent).		

Visitors and contractors have to sign in, after reading the hygiene rules and comply to the health instructions and state as well the absence of diseases.		
Statement of Intent	The company shall ensure that procedures are in place to ensure that employees, agency staff, contractors or visitors are not a source of transmission of food-borne diseases to products.	Y
7.3.1	The company shall have a procedure which enables notification by employees, including temporary employees, of any relevant infection, disease or condition with which they may have been in contact or be suffering from.	Y
7.3.2	Where there may be a risk to product safety, visitors and contractors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from a condition which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas.	Y
7.3.3	There shall be documented procedures for employees, contractors and visitors, relating to action to be taken where they may be suffering from or have been in contact with an infectious disease. Expert medical advice shall be sought where required.	Y
7.4	Protective clothing Employees or visitors to production areas	
The use of protective clothing is part of the hygiene rules, P-FOOD-10017. Work wear used are white trousers, coats long and short without outside pockets, hairnets (coloured - function identification), beardnet, work shoes. For packing employees also single use gloves, aprons and sleeves are used). All required aspects are addressed. Contractor performs laundry.		
Statement of Intent	Suitable company-issued protective clothing shall be worn by employees, contractors or visitors working in or entering production areas.	Y
7.4.1	The company shall document and communicate to all employees, contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. **high-care** or low-risk areas). This shall also include policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, use of canteen and smoking areas).	Y
7.4.2	Protective clothing shall be available that: • is provided in sufficient numbers for each employee • is of suitable design to prevent contamination of the product (as a minimum containing no external pockets above the waist or sewn on buttons) • fully contains all scalp hair to prevent product contamination • includes snoods for beards and moustaches where required to prevent product contamination.	Y

7.4.3	Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined and verified criteria to validate the effectiveness of the laundering process. Washing of workwear by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.	Y
7.4.4	Where protective clothing for **high-care or high-risk areas** is provided by a contracted laundry, this shall be audited either directly or by a third party, or should have a relevant certification. The laundry must operate procedures which ensure: • effective cleaning of the protective clothing • clothes are commercially sterile following the washing and drying process • adequate segregation between dirty and cleaned clothes • cleaned clothes are protected from contamination until delivered to the site, e.g. by the use of covers or bags.	Na
7.4.5	If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible), be intact and not shed loose fibres.	Y
7.4.6	Where items of personal protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and sanitised at a frequency based on risk.	Y