Audit Report

Global Standard for Food Safety Issue 7: July 2015

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		
Justification for exclusion	Justification for exclusion		
Audit Finish Date	2015-10-06		
Re-audit due date	2016-10-29		

Voluntary modules included

Modules	Result	Details
Choose a module	Choose an item	
Choose a module	Choose an item	

2 Audit Results

Audit result	Certificated	Audit grade	B	Audit type	Announced
Previous audit grade	A	Previous audit date	2014-10-07		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	1
	Minor	6

3 Company Details

Address	Den Sliem 1, 7141 JE, Groenlo		
Country	The Netherlands	Site Telephone Number	+31 0544 473100
Commercial representative Name		Email	
Technical representative Name		Email	

4 Company Profile

Plant size (metres square)	<10K sq.m	No. of employees		No. of HACCP plans	1-3
Subcontracted processes	No				
Other certificates held	SKAL, IKB, BKL,, CoC, ISO9001				
Regions exported to	None Choose a region Choose a region Choose a region Choose a region Choose a region				
Company registration number	EG 585 NL				
Major changes since last BRC audit	New plant manager and new QA manager, remediation of packing of product category heated to be reheated.				

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 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 and is certified against the Chain of Custody Standard.
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 (chilled; modified atmosphere, vacuum skin pack) like beef or pork in consumer and bulk packaging. Incidentally prepacked meat products are packed.
In total approximately 23 production lines can be used. The customers are retailers and foodservice in the Netherlands. Incidentally products are sold to Denmark, Sweden and other European countries.
The company employs approximately people and temporary workers. The production is organized from 6.00 am till 6.00 pm. The building is constructed in 1992 and about m2. The company is certified BRC since 2002..
The used quality system is based on one HACCP-study, which is centrally led and guided by the central QA headquarters in Boxtel. In 2014-15 several investments have taken place to improve the digital system. A merge between two software programs is currently taking place. 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. In 2015 is decided to demerge Retail Groenlo and Groenlo with two separate managements. 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	Ambient high care	No

Justification for area	All products are chilled and to be heated
Allergens handled on site	Cereals containing gluten Egg Mustard Celery Milk Soya Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen

Product claims made e.g. IP, organic	BIO, BLK
Product recalls in last 12 Months	No
Products in production at the time of the audit	Pork belly art 43718; Sausage art 21432

6 Audit Duration Details			
On-site duration	16 man hours	Duration of production facility inspection	8 man hours
Reasons for deviation from typical or expected audit duration	none		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2015-10-05	08.30	16.30
	2015-10-06	08.30	16.30

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

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

ı / TOG		X		
/ employee service department			X	
/ Allround foreman CSIZ		X		
/ Operator CS		X		
/ Allround foreman MAZ		X		
/ Allround foreman CS		X		
/ Supervisor TD		x	x	
/ Product development employee			X	

Non-Conformity Summary Sheet

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

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

Major

No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by
1	1.1.10	System to ensure that non conformances of previous audits do not reoccur does not function. Two minor non conformances of last years BRC audit did reoccur during this audit. Control measures presented as evidence did not function properly without notice of management. First there was again unintended usage of primary packaging material. (NC 7 of previous audit). Second there was again a withdrawal in May 2015 on preheated product which should have been kept under positive release for Listeria. (NC 8 of	**Preheated products:** Before the BRC audit in October, the management of Vion Retail Groenlo has decided to stop the production of Preheated products. From week 41, preheated products are not produced at Vion Retail Groenlo **Unintended usage of packaging material (packaging material is used for storage):** Al primary packaging materials are removed from the production department. Special containers are placed for storage of	General Root Cause of this major non conformity: New procedures were not fully implemented. Operators were not aware of the content of changed procedures. The corrective and preventive actions defined after the last BRC audit were not part of the QA actionlist, by this cause the effectiveness of the corrective and preventive actions were not compete certified by QA department. Because of this situation in May a blocked batch of preheated meat preparations is released before the laboratory result was available. As well because of this situation unintended use of packaging material is not prevented completely. Preventive actions: 1. the corrective actions of this BRC audit are mentioned in the action list, part of this action list is verification of the effectiveness of the corrective and preventive measures. See attached action list. 2. A new procedure is integrated in the quality management system: introduction and implementation of new procedures and work instruction. Before a new procedure will be introduced and integrated all relevant personnel must be trained. Operators must sign for 'reading' and 'understood' by new or adapted procedures. This procedure is additional to the current modification and autorisation process in the Vion digital	Seen: Begrepen en gelezen document.pdf Go, no go instruction.pdf Training records unintended usage of packaging material.pdf Centrale QA-actielijst. pdf Verification QA manager.pdf	2015-10-30	Fully Closed

		previous audit).	packaging material to prevent that every employee can use packaging material (for wrong usage). All relevant operators are re-instructed about the correct usage of packaging material Unintended usage of primary packaging material is part of the Vion HACCP system.	quality manual. 3. On daily base there is monitoring on the hygiene procedures by SSOP monitoring, carried out by the production department. The verification of this daily monitoring is increased by a weekly verification carried out by the QA Manager to be sure that the monitoring, registration, corrections after deviations and monitoring after correction is carried out in a correct way. See attached copy of this verification form			

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
2	4.11.2	It is not demonstrated for some low frequent cleaning activities when they are executed. In the planning they are indicated as "to be planned on request" No follow up is recorded.	The list with low frequent cleaning activities for 2016 is adapted. Items with the indication "to be planned on request" are scheduled 1 per year. Executed cleaning activities must be signed (date and initial) when activity is planned.	Root Cause:. Low frequent cleaning activities (for example the walls above 2 meter, the ceilings, etc.) were carried out on request of Vion Retail Groenlo. When this low frequent cleaning activities are carried out wasn't recorded. Action plan: Follow up will be done during weekly meetings by QA Manager Vion and Rayon Manager of the external cleaning company. Meetings are planned. After low frequent cleaning the date is recorded and the effectiveness of the cleaning will be monitored and recorded by the QA department of Vion on a checlist.	Seen: Agenda and actions .pdf Periodiek werk vion retail 2016.pdf	2015-10-30	Closed to be verified
3	4.11.5	Cleanliness of equipment in the storage is not demonstrated as the storage room and equipment was messy and not properly cleaned. Hoses were on the floor and materials not needed for cleaning were present.	storage is cleaned and Personnel are reinstructed.	Root Cause: Cleaning company was not aware of this specific risk and there was no monitoring in this storage area (door is always locked) Action plan: Cleaning check in storage is weekly documented in a checklist. QC verifies the cleanliness (QC have a key now)	Seen Pictures: storage.pdf Checklist.pdf Controle opslag.pdf Instruction &QC.pdf	2015-10-30	Fully closed
4	5.3.4	Management of allergens is documented	Document 'draaivolgordevanafwk3	Root Cause: Article is not recorded in the sequence list (draaivolgorde)	Seen: Allergenenproce	2015-10-30	

		in a list "draaivolgordevanafwk39.xlsx". Article 21432 was produced during the audit. The article was not on the list and production personnel did not know whether allergens were in the recipe.	9.xlsx' is adapted. All actual articles and recipes are integrated for all production lines . All involved staff members (product development, QA and production must) are re-trained in procedure P-RGR-NL-10023 and P-RGR-NL-10113.	because it was a new recipe on the meat dough preparation department. When a new recipe is developed P-RGR-NL-10023 must be followed. This did not happen sufficiently. Action plan: Implementation of a renewed NPD-checklist by introduction new articles/recipes. Operator must take corrective actions (PMT) when they not produce according the sequence list. Quality control verifies daily the real-time sequence from CSB with the prescribed sequence.	dure.doc Draaivolgorde.pdf NPDchecklist.doc PMT.pdf Procedure introduction new product. pdf Training records production.pdf Training records QA NPD and management.pdf Verification QC.pdf		Fully Closed
5	5.5.1	there was again unintended usage of primary packaging material. (NC 7 of previous audit on clause 5.4.2).	See major 1	See major 1	See major 1	2015-10-30	Fully Closed
6	5.7.1	There was again a withdrawal in May 2015 on preheated product which should have been kept under positive release for Listeria. (NC 8 of previous audit on clause 5.6.1).	See major 1	See major 1	See major 1	2015-10-30	Fully Closed

7	7.4.2	Thermo jackets worn in low risk zones have external pockets above the waist which are in use.	All external pockets are sewed and purchasing agent is re-instructed. See attached photo of sewed pockets.	Root Cause: Purchase, who is responsible for buying thermo jacket was not aware of this specific risk. Thermo jacket are not available without external pockets. New ordered jackets will be sewed before they can used by production personnel. Instructions made for purchase.	External pocket before and after.pdf Instruction for use.pdf	2015-10-30	Fully Closed

Comments on non-conformities

Root Cause and preventive measures pre heated products:

All pre heated products produced at Vion Retail Groenlo in the weeks before week 41 in 2015 are labeled with the following instruction: 'Product must completely heated before consuming' (door en door verhitten voor consumptie). In the time between the last BRC audit and May 2015 the received goods were blocked, but not registered on a form. In May 2015 this became clear and from that moment on every blocked batch of preheated products is documented on a form. As well Vion Retail Groenlo decided to stop handling of preheated products. During the BRC audit in October 2015 there weren't handled preheated products on site.

Voluntary Modules Non-Conformity Summary Sheet

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

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor

No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by

Detailed Audit Report

Details of non-applicable clauses with justification	
Clause reference	Justification
3.5.4	No outsourced processing
4.3.5	Only low risk areas
4.3.6	Only low risk areas
4.3.7	Only low risk areas
4.4.13	Only low risk areas
4.8.4	Only low risk areas
4.8.5	Only low risk areas
4.9.4	Products packed in flexible plastic
4.9.5	Products packed in flexible plastic
4.10.2	No filters and sieves applied
4.10.4	No magnets applied
4.10.5	No optical sorting equipment applied
4.10.6	No rigid containers are applied
4.11.7	No CIP applied

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 09-09-2015 electronically signed by the new plantmanger. 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, production managers, manager Maintenance, Manager HR, Manager F&C. Yearly management review takes place. Seen management review reviewing juli 2014-june 2015, signed

by most senior manager and discussed 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 communication 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. Monthly HACCP-team meetings take place.

Major nc: System to ensure that non confomances of previous audits do not reoccur does not function. Two minor non conformances did reoccur during this audit. First there was unintended usage of primary packaging material. (NC 7 of previous audit) Second there was a withdrawal in may 2015 on preheated product which should have been kept under positive release for Listeria.

1.2 Organisational structure, responsibilities and management authority

Organogram seen, P-RGR-NL-10080 rev 19 dd 21-9-2015, 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.
Relevant personnel has access to software as VIONline and and other IT software.

2 The Food Safety Plan – HACCP

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 ≤6,8°C, vacuum fresh meat ≤ 5,8°C, organ meat ≤ 2,8°C, meat preparations ≤3,8°C, fresh poultry ≤3,8°C, cooked and smoked sausages ≤6,8°C, frozen ≤ -17,8°, fresh vegetables and dairy ≤6,8°C. 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 96, was calibrated and correctly used

HACCP-team is Manager QA, assistant QA manager, Manager Production foreman and is described in P-RGR-NL-10004. Minutes of monthly meetings were seen.

The PRP is present in the HACCP system, P-VION-10006 and P-RGR-NL-10031. All required aspects are in place, 24 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 review was documented in F-RGR-NL-10145 dated 25-06-2015.

Due to last year BRC audit and a withdrawal in May 2015 of a meat product containing Listeria, the only packed meat product in the assortment now is vacuum packed cooked smoked sausage (rookworst).

3. Food safety and quality management system

3.1 Food safety and quality manual

All relevant QA documents are digitally available and controlled in the VION software system to manage documents. All procedures are clearly coded through the whole VION group, by using in the documents: VION, FOOD, NL and RGR. Also Forms and instructions are captured in the system.

3.2 Documentation control

Documents containing procedures and forms are managed in ., Specifications to operate packing lines are visible in , companies planning and logistic system managed by the Product development manager.

3.3 Record completion and maintenance

Records are gattered centrally and archived for a predetermined period. All records were retrievalble during the tracetest and during the audit.

3.4 Internal audit

Internal audits are scheduled, seen planning and realisation of 2014-2015. Audit procedure in place, P-VION-10011. Two audit records of past year were shown with major and minor non conformances by a trained and qualified auditor. Seen records od 17-4-2015.

Vion Food has an internal auditteam which visits all VION Food locations. They are trained and harmonised by Headquarters in Boxtel. Also follow up, recording and planning is arranged centrally.

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.

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.
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 is analysed by an external laboratory.

3.5.2 Raw material and packaging acceptance and monitoring procedures

Seen acceptance forms F-RGR-NL-10079 on raw materials and F-RGR-NL-10103 on packaging. additives and vegetables as herbs and spices. Checked the certificates of supplier of herbs to decorate products, has a certificate FSSC valid until 27-04-2018.

3.5.3 Management of suppliers of services

The management of suppliers of services is centrale araanged by HQ. Seen H involvement in the washing of protective clothing, pest control, transport, training, cleaning and laboratory testing.

3.5.4 Management of outsourced processing and packing

na

3.6 Specifications

Specifications for raw fresh meat for intercompany deliverances are controlled on VION-line and MDM (Master Data Management).
Specifications for finished product are displayed in the terminals on the packing lines and the management of correct internal specifications is responsibility of the product development manager. Seen correct specifications of 23717 and 43718. (pdf's are created from word files and placed on a secured part of the digital internal network to be used by

3.7 Corrective and preventive actions

A procedure to manage products and processes with non conformances is in place: P-RGR-NL10037. The communication system within VION is as indicated befor: M for upscaling.

3.8 Control of non-conforming produce

Seen the usage of blocking form F-RGR-NI-10004 in storage and F-RGR-NI-10018 on returns to suppliers for not accepted raw materials. All nonconformities following from CP control measures are trended and form part of the reassessment (H2).

3.9 Traceability

During the audit a tracetest was done on article 43717 produced on 25-6-2015. Batch of 15,509 kg was produced. The test was readily retrievable and all information was presented to the auditor within time. Also there were 6 withdrawals past year all on microbiological results (pathogenes) and one was used for the recall test on 29-6-2015.

3.10 Complaint handling

On average there are 33 complaints per week on a various range of categories (Quality, Food safety and Foreign bodies). Past year 8 complaints were received in category Food safety. 4 on missing labels, 3 on rotten before date and one on product with mould. The complaints are gathered trended and analysed by

headquarters and communicated to the location. No direct contact with retailers or consumers.

3.11 Management of incidents, product withdrawal and product recall

Recalls are managed by HQ procedure P-VION-10015. All required aspects are addressed.
Yearly a recall test, including a traceability test, is done. Last test dd 25-08-2015. CI is included in the procedure. No recalls last year till now.

3.12 Customer focus and communication

All finished product specifications contain the requirement as indicated by retailer. Weekly control on correct pricing including testing of label content by two persons.

4. Site standards

4.1 External standards

The production location is situated at an industrial area. The outside area is paved and fenced with two gates. No outside storage of materials, equipment, packaging.
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. Recently more labelling activities are taken over from other VION plants making the route to retailer shorter.

Entrance is only possible after passing reception and signing for house rules (according veterinary rules and export legislation). Other entrances on de dispatch department and the maintenance department are under control and cannot be opened from outside.

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 register their entrance. Visitors have to sign in, after reading the hygiene rules and comply to health instructions. Visitors are only allowed in the building together with the contacted employee. External maintenance workers sign a form called F-RGR-NI-100010 "Werkvergunning" also concerning personal and safety instructions.
Due to lightning the electronic access control is out of order and a paper system is in place awaitening a new system. All docking trucks and trailers are registered.
All employees, also temporary employees, are identified by recording a copy of their ID and BSN.

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. After passing the hygiene corridor all areas are defined low risk areas with hygiene standards to prevent contamination. This also applies for areas where products are closed eg storage and labelling.
The gourmet area is reconstructed more then a year ago, the walls still to be finished but no hazards for product safety noticed.

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.

4.5 Utilities – water, ice, air and other gases

Utilities used are MAP gas (CO2 and O2), nitrogen gas for freezing and water for cleaning (also as an ingredient into minced meat). No ice used. All gasses used are food grade. Water used on site is potable water. The water is tested 4 times a year by ' (ISO 17025 accredited laboratory). Air used for direct contact with product (hamburger cylinder) is production air and is tested weekly for cleanliness of the system by production QA/TOG. The air system maintained by and filters are replaces yearly. The Cooling system is maintained by at predicted intervals. Gas mixing installation is certified by firm . No issues raised

4.6 Equipment

All equipment is designed hygienic, a hose for pumping marinade sauce was conform EHEDH design and had declaration for food contact (1935/2004). 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 hose

4.7 Maintenance

Maintenance is organised by using a maintenance management software system: All workorders are scheduled and recorded.
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 shoebrush cleaner and handwash equipment is present at the entrance to the production to avoid swarf bites into the production. No temporary repairs seen during audit.

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. All ersonnel touching product has to wear gloves and sometimes also sleeve protection.
Catering is not outsourced, but done by own personnel with no limitations to recipes or ingredients.
No high risk or high care operations. No deviations seen during audit.

4.9 Chemical and physical product contamination control

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

Several control measures apply on contamination.

4.9.1 Chemical control

All chemicals used are listed. All chemicals are stored in a separate secured room. A non food grade ink remover was present in a storage department, close to the ink printer, approved by control system as product is closed there.

4.9.2 Metal control

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.

4.9.3 Glass, brittle plastic, ceramics and similar materials

The state of all glass and brittle 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.

4.9.4 Products packed into glass or other brittle containers

Na

4.9.5 Wood

Wood is only used as packing in the expedition and storages areas. No wood seen in areas with open product.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

All product is metal detected and 23 packing lines have multiple metal detectors. No other detection or segregation is in place.

4.10.2 Filters and sieves

Na

4.10.3 Metal detectors and X-ray equipment

Metal detectors are CP's according the HACCP analysis, and are controlled with effective measures. For the removal of potential foreign bodies metal detectors are in place at the end of each packaging line. Accuracies are Fe . · mm, nonFe mm and SS 30⁴) 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). Some products are packed into an aluminium tray. A metal detector before packing checks

these products. (Not applicable during the audit.)

4.10.4 Magnets

Na

4.10.5 Optical sorting equipment

Na

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

Na

4.11 Housekeeping and hygiene

Cleaning is carried out by an external company (, dedicated for all VION sites and contract under responsibility of HQ). 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.

Minor NC 1: It is not demonstrated for some low frequent cleaning activities when they are executed. In the planning they are indicated whit "to be planned on request" No follow up is recorded.

Minor NC 2: Cleanliness of equipment in the storage is not demonstrated as the storage was messy and not properly cleaned. Hoses were on the floor and materials not needed for cleaning were present.

4.11.7 Cleaning in place (CIP)

Na

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 3). All waste is clearly identified (bins and cat 3 crates). (P-RGR-NL-10132 Afvalbeheer)

4.13 Management of surplus food and products for animal feed

Surplus food and left overs, machine left behinds are collected and disposed of as Cat 3 according legislation. Branded ready finished product as well.

4.14 Pest Control

The pest control is managed by contractor Cotract available in dated 1-7-2014. Visit frequency: 13x/year routine visits; 2x/year QA inspection, 4x/year counting flying pest 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 on 29-9-2015. Outside are relatively many bait stations because of activities of neighbours which are acknowledged. Plans are in place locating bait stations and fly killing devices. Findings are recorded and closed out. Still two open finding awaiting actions.

4.15 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 and alarms are in place to relevant maintence personnel.
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.
Currently a storage cell is transformed to weighing and collecting of batches of ingredients because in production the space was limited and the carry over factor regarding allergens has inspired this decision.

4.16 Dispatch and transport

The dispatch and transport is organised by procedure P-RGR-NL-10090 and 10079. At dispatch the product temperature is checked. Records of dispatch are made: date and time of loading, name of transporter, destination, truck sign, hygienic state of truck and temperature in the loading compartiment. Temperature limit is max !°C.

5. Product control

5.1 Product design/development

Product development is controlled by checklist "Programma van Eisen"rev 1 date 28-4-2015. No finished projects on this form yet. Seen development records of article 55177 to a pdf ready to use for the packing department.
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.

5.2 Product labelling

Labelling instruction is displayed in the specification. Photo of example is included to indicate place and size of the labels Also label article numbers are included. Labels are ordered and set out by logistic department on request and only daily usage is in packing area available. Due to the switch to all labels and packing material will be treated as ingredients and calculation and traceability is simplified.

5.3 Management of allergens

Allergens are managed by procedure P-RGR-10113. Based on an allergen matrix, the production is scheduled. (draaivolgorde date.xlsx). Also canalisation of organic and other meat is managed by this sheet. Different measures apply in different departments. In the Meat Preparation department, identifying allergen is start as clean as possible and for some machines the machines are flushed with product before production. Rework is used in the meat preparation department, identifying allergens. During audit production schedules seen.

Central Butchery: if allergens are present which can contaminate the product next in line measurements are taken. Products with the same allergens are planned together and new hand shoes, sleeves and aprons, the line will be cleaned dry. Measurements are based on an allergen residue validation plan.
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.

Minor nc 3: Management of allergens is documented in a list "draaivolgordevanafwk39.xlsx. article 21432 was produced during the audit. The article was not on the list and production personnel did not know whether allergens were in the recipe.

5.4 Product authenticity, claims and chain of custody

Production and packing of organic products (Bio+), FS and GFproducts. Certification against the Standard Chain of Custody has led to a vulnerability study defining suppliers is risk categories. Procedure risicomanagementbeheersplan Chain of Custody P-RGR-NL-10138 describes control on processes involved. Procedure P-NLFood-10211describes the place in the chain of VION plants in relation to their suppliers and customers. S-MMI-10011 and S-MMI-10199 display an overview of suppliers of branded meat. In P-NLFood-10087 is discribes how VION monitors her suppliers, an overview of auditors and suppliers is recorded as wel as the non conformances.

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 = FS (Farming Star/Beter Leven Keurmerk/1*) 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.

5.5 Product packaging

Product packaging is stored in dedicated storage. Logistical system is now being digitalised so control is more efficient. All primary packaging in storage was covered and stocked correctly.
Examined was the paper in storage of supplier Meatpakpaper which had a 1935/2004 confomacy declaration available on
The major non conformity arose when rimary packaging was found for not intended use on several places in the factory. (Also to efficiently store the meatpakpaper).

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Products are inspected during production on foreign bodies (metal detection), on gas atmosphere and on temperature. For verification a microbiological inspection program is applicable on products and on equipment/building and also water is analysed.

5.6.2 Laboratory testing

Products are checked for microbiological values based on a monitoring program advised by central VION QA. (P-RGR-NL-10000) for TPC, E-coli, Enterobacteriacea Listeria and Salmonella. Translated in a site plan. Results are monitored as a KPI on a weekly basis. Products are also tested for shelf life. Seen test of equivalent product in tracetest on 51643 shelf life 14 days, on day 14 log 4,70 (TPC), log 2,00 (Entero).
All test results are logged on on VIONline and analysed for trends.
Water analyses is available as well. On 16-03-215 water was tapped according the waterplan and tested on Escherichia coli (0cfu/100ml); TPC 22°C (<1 cfu/ml) ans Intestinal entrerococci (0 cfu/100ml).
No laboratory on site. Microbiological tests are done by , accreditation

5.7 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.
Now no positive release is applicable anymore. Untill May 2015 for incoming cooked meats only to be packed a product release procedure was applicable but not under god control. Therefor the productline is discharged resulting in a major non conformity during this audit for not having in place effective control measures.

6. Process control

6.1 Control 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 of operations. For each measurement limits are clear. Corrective actions are recorded. Each recorded form is signed by the responsible department foreman.

6.2 Labelling and pack control

Labels are tested on pricing for some retailers. Prices are on a weekly bases. All costumer labels are in the specification available on the system indicating number, placing and information. Verification is possible because all runs are signed of including an example of the produced label on beginning and after the last usage.

6.3 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. Scales are calibrated according the plan and under review of the maintenance manager.

6.4 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 of thermometers and scales is recorded on F-RGR-NL-10060 and F-RGR-NL-10057 Thermometercontrole, F-RGR-NL-10060 Controle weegschalen. Calibration of thermometers at receiving (CCP) nr 96 were justified against the calibrated thermometer (1x/year). Therefor an extra 0,2 °C was deducted from the CCP limits.

7. Personnel

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

CCP training is organised, records seen for all receiving employees, dd 25-8-2015 on knowledge of P-VGR-NL10076 revised 18-8-2015 concerning training on topic CCP Temperature of incoming raw materials.
All staff, (also temporarily) is trained prior to commencing work. Per agency excel-sheets with workers are availbable including the date of induction training. The training is available in several language (Dutch, English, German, Polish, Romanian, Slovak). Ttemporary worker had induction training on 30-5-2012 and not been working constant for the company, this trainingrecord is still valid.
An e-learning program on a two year schedule is planned for this year. Course is ready and made available by . All workers will be trained as was done in 2013. (Course in Dutch for all).
In 2014 an education program on low literacy was executed.

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.

7.3 Medical screening

New employees, including temporary employees, are screened on health. Export legislation demand such screening as well and a physician is contracted via the agencies to comply to this requirement.
Visitors and contractors have to sign in, after reading the hygiene rules and comply to the health instructions.

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 and thermal jackets. For packing employees also single use gloves, aprons and sleeves are used). All required aspects are addressed. Contractor performs laundry.

Minor nc 4: Thermo jackets worn in low risk zones have external pockets above the waist which are in use.

Traded Goods Module

Scope

8.1 Approval and performance monitoring of manufacturers/packers of traded food products
8.2 Specifications
8.3 Product inspection and laboratory testing
8.4 Product legality
8.5 Traceability