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	**2016-10-11**		
Re-audit due date	**2017-10-29**		

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	**AA**	Audit type	**Announced**
Previous audit grade	**B**	Previous audit date	**2015-10-06**		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	5

3 Company Details

Address	Den Sliem 1, 7141 JE, Groenlo		
Country	The Netherlands	Site Telephone Number	+31 0 544473100
Commercial representative Name		Email	.@vionfood.com
Technical representative Name		Email	@vionfood.com

4 Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3

Subcontracted processes	No
Other certificates held	SKAL, IKB, BKL, CoC, ISO9001
Regions exported to	Europe Choose a region Choose a region Choose a region Choose a region Choose a region
Company registration number	NL 585 NL
Major changes since last BRC audit	New assistant QA manager, new customers

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 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. The company is certified BRC since 2002. 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. Seasonally and incidentally prepacked meat products and poultry is packed. In total approximately 23 production lines can be used. The customers are retailers and foodservice in the Netherlands, Denmark, Sweden and other European countries. The company employs approximately ´ people and temporary workers, in periods of high volume this can increase up to ` ` temporary workers in December. The production is organized in one dayshift from 6.00 am. The building is constructed in 1992 and measures . The quality management system is based on one HACCP-study, which is centrally led and guided by the headquarters QA in Boxtel. In 2015-16 several investments have taken place to improve the digital system. Management is by a team of 7 and some take also place in the management team of VION Groenlo, the neighbouring slaughterhouse (Controller, HR manager, Maintenance manager). Company is successfully implementing VOS2.0, the operating system based on lean management. The meeting structure and the responsibilities per person are simple and clear. www.VIONfood.nl

5 Product Characteristics

Product categories	03 - Raw prepared products (meat and vegetarian) Category Category 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** **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 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	**Chipolata sausage art 57255; Schouderkarbonade 55247**

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)	**2016-10-10**	**08.30**	**16.30**
2	**2016-10-11**	**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 manager	X	X	X	X
/ QA assistant	X	X	X	X
/ employee service department- purchase			X	
/ HR manager			X	
/ Supervisor TD		X	X	

/ Allround foreman CSIZ			X	
/ Operator Allergens		X		
/ Ass. Controller		X		
/ Operator CS		X		
/ Foreman Supply Chain		X		
/ Receipt officer		X		
/ TOG		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**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	3.5.2.1	Supplier assessment and evaluation system as described in P-Food-10025 and P-Food-10032 does not comply current method. In the management review not the same criteria arise an another method of appraisal is in use in practice. Not all MMI's records are correct although off all checked suppliers valid questionnaires were found.	The supplier assessment non-food was already executed in 2015. The overview of qualified food suppliers is updated	The quality manager was not informed about the supplier assessment for non-food. This assessment shall yearly be listed in the management review. We failed to examine the overview list of qualified suppliers. Some suppliers we not listed although the questionnaires	Seen: Leveranciers beoordeling diensten en materiaal 2014 en 2015 dd okt 2015 Lijst toegelaten leveranciers VION Food NL NW 10-10-2016 S-MMI-10011	2016-10-31	

		FULLY CLOSED		were present in We will frequently check if these actions are executed by the Group Quality Manager.	List suppliers Additives VION Food NI dd 19-10-2016 S-MMI-10190		
2	4.5.2	The diagram of the water distribution system does not show were the sampling has taken place. It is not clear whether the new dosing system in the dough department is included in the diagram. **FULLY CLOSED**	The diagram is adapted to the current situation	This specific diagram was not an official document in . There was no system to revise this diagram The new diagram shall be yearly reviewed (automatically by) by the quality department	Seen: F-RGR-NL-10166 Overzicht tappunten wateronderzoek dd 27-10-2016	2016-10-31	
3	5.1.2	It is not clear how new methods of processing and new packaging materials are formally approved by the HACCP team (leader/ member). No procedure is present and the procedure on implementation of new or amended product (P-NLFOOD-10191) and Product development (P-NLFOOD-10190) of HQ is not adhered to. Seen amendments in water system, new rolled meat casings without approval of the HACCP team. **CLOSED TO BE VERIFIED**	New procedures regarding product development is made.	Approval of new processes and packaging material happened informal. All necessary steps are carry out. New checklists are made to record the approval (by a member of the HACCP-team) formally.	Seen: F-RGR-NL-10167 Controlestappen nieuw verpakkingsmateriaal F-RGR-NL-10168 Controlestappen nieuwe processen P-RGR-NL-10150 Productontwikkeling	2016-10-31	
4	6.2.1	On the trolley for packing material for lines 9/13 the 5S methodology is used and allocation is prescribed. Roll of label found on the wrong place as there were too much of this rolls present, or 5S label allocation form is not correct.	All rolls stored on the trolley are allocated to the right place as described to the 5S form	There was no formal check to ensure the right allocation of the rolls. Introduction of a new 5S (workplace organization method) control form to ensure the rolls	Seen: Training records on "5S 10 p verbeter programma" dd 28-10-2016 by 8 people 5S 10 punten	2016-10-31	

		FULLY CLOSED		are allocated at the right place. All relevant personnel are trained.	verbeterprogramma CS Afdeling		
5	6.3.1	**Specification of article 57255 indicates other values as the system uses. The values in the weigher are correct so no impact on quantity of this batch. (T0; T1 and T2 is resp 225, 216, 207). Spec 57255 dd 2-9-2016 does not comply with practice.** **FULLY CLOSED**	**Specification of article 57255 is adapted to the right values regarding the weigher**	**Because of a miscalculation the T1 and T2 limits were not correct listed in the internal specification.** When an introduction of a new product takes place a formal check regarding T1 and T2 limit will executed by the TOG personnel (technical supporting group) All TOG personnel are trained.	**Seen:** F-RGR-NL-10061 Testen Etiket Interne Productspecificatie 57255 dd 10-10-2016 Training records on 'Introducite nieuw product"dd 28-10-2016 by 4 people	2016-10-31	

Comments on non-conformities

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

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, 09-2016 electronically signed by the site manager. Objectives are described by using the VOS2.0 x-matrix with responsibilities for all department managers: Safety, People, Quantity Delivery, Cost. MT consists of the plant manager, production managers, manager Maintenance, Manager HR, Manager F&C.

Quarterly management review takes place. Seen management review reviewing July 2015-june 2016, signed by most senior manager and discussed in the MT published on 7-9-2016. All relevant items are addressed and in 3.1 the results of internal and external audits is seen. In 5.4 the CCP analysis is summarized.

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. Seen KPI overview of week 39, 38, 37, 36.

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.

1.2 Organisational structure, responsibilities and management authority

Organogram seen, P-RGR-NL-10080 rev 19 dd 9-9-2016, 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.
Relevent personnel has access to software as and , and other IT software.

Details of non-applicable clauses with justification

Clause reference	Justification

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 was calibrated and correctly used.
HACCP-team is Manager QA, assistant QA manager, Manager Production Foreman Production, Maintenance foreman and Supply chain foreman and is described in P-RGR-NL-10004. Actions from the meeting are plotted in a sheet in VOS2.0 structure.
The PRP is present in the HACCP system, P-VION-10006 and P-RGR-NL-10031. All required aspects are in place, 25 CP's are defined. Plan is verified on 12-8-2016.
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.
The only packed preheated meat product in the assortment now is vacuum packed cooked smoked sausage (rookworst).

Details of non-applicable clauses with justification

Clause reference	Justification

managed by HQ. 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.

Minor 1: Supplier assessment and evaluation system as described in P-Food-10025 and P-Food-10032 does not comply current method. In the management review not the same criteria arise an another method of appraisal is in use in practice. Not all MMI's records are correct although off all checked suppliers valid questionnaires were found.

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 approval of
Some approved by questionnaire, some by GFSI certificate. All approved suppliers are listed in MMI records.

3.5.3 Management of suppliers of services

The management of suppliers of services is centrally arranged by HQ. Seen HQ 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 and MDM (Master Data Management).
Specifications for intermediate and 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 specifications of 55247 and 57255. Pdf's are created from word files and placed on a secured part of the digital internal network to be used by software). (see minor 6.3)

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 before: MMM/Huddle/Tier1/Tier2/Tier3 for upscaling.

P-RGR-NL-10037 Producten en processen met tekortkomingen PMTis applied and records are monitored in the management review quarterly. Past year several PMT on the working order as planning deviated from realisation. The new upgrade has tackled this gap in IT. (

3.8 Control of non-conforming product

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

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 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. The VOS2.0 methodology is not yet incorporated in the FSM 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. On the packing lines screens are available to call the correct specification to the operation.

3.3 Record completion and maintenance

Records are gattered centrally and archived for a predetermined period. Records were quickly retrievable during the trace test and during the audit.

3.4 Internal audit

Internal audits are scheduled, and planning and realisation of 2015-2016 is on schedule. Audit procedure in place, P-VION-10011. Audit record of 22-8-2016 seen on an unannounced internal audit by with 4 minor non conformances. Also 4 non conformances of the previous audit were closed out and conformances are mentioned.

Vion Food has an internal audit team 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

form part of the reassessment (H2).

3.9 Traceability

During the audit a trace test was done on article 6190 produced on 29-6-2016. Batch of 240 crates with 3x12 items was produced. The test was readily retrievable and all information was presented to the auditor within time.
Also there were notices from authorities past year on microbiological results (pathogenes) and one was used for the recall test on 1-11-2015. Furthermore trace tests are done during the CoC audits an on 20-8-2016 on customer request.

3.10 Complaint handling

A KPI goal of 8 complaints / 100 ton is set. Complaints arrive from customers per mail; and from retailers via VION HQ database. Results together are put in a database for trending and analysing. KPI currently 6,7. No direct contact with retailers or consumers.
Complaints are on a various range of categories (Quality, Food safety and Foreign bodies). Past year several complaints were received in category Food safety, several on missing labels, on rotten before date and one on product with mould.

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 1-11-2015. 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.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.4	No outsourced processing

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. Water holding tank is situated outside in isolated situation.
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. Recently more labelling activities are taken over from other VION plants making the route to retailer shorter and transferring some storage areas to labelling areas, where product is enclosed in its final consumer packing.

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 by tagging. 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.
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.

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. If condensation appear strict orders and instructions apply on removal. (P-RGR-NL-10112)

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

Minor nc 2: The diagram of the water distribution system does not show were the sampling has taken

place. It is not clear whether the new dosing system in the dough department is included in the diagram.

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.

4.7 Maintenance

Maintenance is organised by using a maintenance management software system: . All work orders are scheduled and recorded. Seen the work order for the replacement of a valve in the water management system on 14-9-2016.
All lubricants used are listed. Chemicals are stored separately in a secured room. Lubricant types used per equipment is identified in Infor. Toxic chemicals are only allowed where they cannot contaminate the product or equipment. Oil used in pressed air system is food grade. Specifications are available.
The workshop is sufficient organised. A shoe brush 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 personnel 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. Dedicated personnel for handling chemicals.

4.9.2 Metal control

To prevent metal contamination a procedure for knife use is present, P-RGR-NL-10121, 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. Seen checks of 5-10-2016

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 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 (technical 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. Last audit a minor was raised on recording of low frequent cleaning activities and a schedule was made an adhered to. Seen records of cleaning verification on F-RGR-NL-10025.
Also 4x per year the chemical concentration of the dosing systems are measured and calibrated once per year.

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 2 and 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 as supplier has replaced since march 2016. Contract available in online environment dated 24-3-2016. Visit frequency: 8x/year routine visits; 1x/year QA inspection, 4x/year counting flying pest and 1x/year maintenance. All required aspects are present in the programme. Online log is available as well as online correspondence on actions and corrections. 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 dated 29-9-2016. Findings are recorded and closed out. No 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 and alarms are in place to relevant maintenance personnel.
An employee (sweeper) is responsible for the flow out of the incoming storages into production to maintain correct fifo and batch identification.
Recently 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 4°C. Some customers require max 2°C.

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5, 4.3.6, 4.3.7	Only low risk areas
4.4.4, 4.4.13	Only low risk areas
4.8.4, 4.8.5	Only low risk areas
4.9.4, 4.9.5	Products packed in flexible plastic
4.10.2	No filters and sieves applied
4.10.4	No magnets applied
4.10.5	No optical sorting equipment applied
4.10.6	No rigid containers are applied
4.11.7	No CIP applied

5. Product control

5.1 Product design/development

Product development is managed by HQ procedures P-NLFOOD-10191 "Implementatie nieuw en gewijzigd product" and P-NLFOOD-10190 "Product Ontwikkeling". Both procedures date from 2012 and Change control for HACCP is part of the checklist F-RGR-NL-10061.

Minor 3: It is not clear how new methods of processing and new packaging materials are formally approved by the HACCP team (leader/ member). No procedure is present and the procedure on implementation of new or amended product (P-NLFOOD-10191) and Product development (P-NLFOOD-10190) of HQ is not adhered to. Seen amendments in water system, new rolled meat casings without approval of the HACCP team.

the supplier/pool manager.

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 P-RGR-NL-10000 v24 dd 6-10-2016 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-FOOD-10010 Shelf live testing, and P-Food-10009 Collection of amples for microbiological Analysis) 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 day 0 on art 6190 log 4.15, 3.99, 4.04, 4.00,4.56(n=5) (ISO4833-1 method). All test results are logged on [redacted] and analysed for trends.
Water analyses is available as well. On 23-09-2016 water was tapped according the waterplan and tested on Escherichia coli (0 cfu/100ml); TPC 22°C (<1 cfu/ml) and Intestinal entrerococci (0 cfu/100ml).
No laboratory on site. Microbiological tests are done by [redacted] 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. For microbiological testing batches are created and positive release applies if results are sufficient.

Details of non-applicable clauses with justification

Clause reference	Justification
5.6.2.2, 5.6.2.3, 5.6.2.4	No on-site laboratory

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 are treated as ingredients and calculation and traceability is simplified.
All product is identified by labels with scanning identification. At entrance these labels are made and in each proceeding step new labels are produced and accompanying the product. Accurate traceability is seen in the trace test.

5.3 Management of allergens

Allergens are managed by procedure P-RGR-10113. Based on an "omstelklasse" (a two digit number indicating the measures to be taken after producing it) determined for every article/dough, the production is scheduled. Also canalisation of specie, 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.
Recently an herbs&spices cell is arranged to manage the weighing and storing of additives.
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.

5.4 Product authenticity, claims and chain of custody

Production and packing of organic products (Bio+), FS and GF products. 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 describes how VION monitors her suppliers, an overview of auditors and suppliers is recorded as well as the non conformances. (This auditor also audits the CoC audits.)

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 freezed/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. A procedure and record is available to manage the pooled crates with deviations (broken, dirty, damaged, etc) to be send to

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 performed 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.

Minor 4: On the trolley for packing material for lines 9/13 the 5S methodology is used and allocation is prescribed. Roll of label found on the wrong place as there were too much of this rolls present, or 5S label allocation form is not correct.

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 and tarra weights are monitored. (Seen the license signed by PS dd 05-2011) Scales are calibrated according the plan and under review of the maintenance manager.

Minor 5: Specification of article 57255 indicates other values as the ' system uses. The values in the weigher are correct so no impact on quantity of this batch. (T0; T1 and T2 is resp 225, 216, 207). Spec 57255 dd 2-9-2016 does not comply with practice.

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 107 were justified against the calibrated thermometer (1x/year). Therefor an extra 1 °C is deducted from the CCP limits.

Details of non-applicable clauses with justification

Clause reference	Justification

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. Seen recors of dd 19-04-2016 on F-RGR-NL-100158.
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).
Per workspace an instruction is written and competences per staff member is monitored. All personnel and all workspaces/instructions are listed in excel-sheet Functiematrix vast VRG.xlsx.
An e-learning program on a two year schedule is planned for this year. 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.

Details of non-applicable clauses with justification

Clause reference	Justification

Module 8 - Traded Goods

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

Module 9: Management of Food Materials for Animal Feed

Scope	

9.1 Management Commitment

9.2 HACCP

9.3 Outsourced Production

9.4 Specifications

9.5 Traceability

9.6 Chemical and Physical Product Contamination Control

9.7 Labelling
9.8 Training

Module 11: Meat supply chain assurance	
Scope	
11.1 Traceability	
11.2 Approval of meat supply chain	
11.3 Raw material receipt and inspection	

11.4 Management of cross-contamination between species
11.5 Product testing
11.6 Training