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Audit Report

Global Standard for Food Safety Issue 7: July 2015

1. Audit Summary			
Company name	Vion Scherpenzeel B.V.	BRC Site Code	8476525
Site name	Vion Scherpenzeel B.V.		
Scope of audit	Deboning, cutting to specification, packing in bulk and consumer packaging (modified atmosphere, chilled) and freezing of pork. Production and packing in bulk packaging of cured and/or smoked bacon, meat preparations and mechanical separated meat, including Good Farming®-meat.		
Exclusions from scope	None		
Justification for exclusion	None		
Audit Finish Date	2015-10-14		
Re-audit due date	2016-10-31		

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	A
		Audit type	Announced
Previous audit grade	A	Previous audit date	2014-10-29

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	10



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3. Company Details			
Address	t Zwarte Land 13, 3925 CK, Scherpenzeel		
Country	The Netherlands	Site Telephone Number	+31 033 277 51 51
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
Subcontracted processes	Yes		
Other certificates held	ISO 9001, IKB, farming star, USDA, organic (SKAL 026059), CoC (Chain of Custody).		
Regions exported to	Europe North America Oceania Asia Choose a region Choose a region		
Company registration number	NL82EG		
Major changes since last BRC audit	CoC (Chain of Custody) certification		



Company Description

VION Scherpenzeel B.V. is specialized in the deboning, cutting to specification, packing and cooling or freezing of pork, production of cured and/or smoked bacon and the production of mechanical separated meat, msm (so called desinewed minced meat (DMM)). Only pork meat processing. Also other products can be produced like pork tenderloins. The final products are based on welfare and good farming breed programmes for the pigs (GB and GF). The raw materials are only bought at slaughterhouses, which are part of the VION Group in the Netherlands. The company is part of the VION Group, which is one of the biggest meat processing and selling companies in Western Europe. Meat scraps are also bought from meat processing companies in France and Germany. At Scherpenzeel there are employees working in a 2-shift system. Approx. people employed by Vion. Other employees are contracted by an in-house agency. Production capacity: approx. B2B delivery, no consumer packaging. The storage and transport of finished products is outsourced (cooled and frozen) including the deep-freezing of some products (like DMM). Internal cleaning of pallet boxes. Outsourced cleaning of crates.

5 Product Characteristics

Product categories

03 - Raw prepared products (meat and vegetarian)
Category
Category
Category

Finished product safety rationale

Temperature < 2/-18 (DMM), < 4 (meat preparations), < 7 or < -18 (other products) degrees Celsius, vacuum packaging (bacon), MAP packing (< 1,5 O2/> 98,5 % CO2), dosage nitrite (> 1 gram/litre brine)

High care No

High risk No

Ambient high care No

Justification for area

All products have to undergo full cooking step prior to consumption. Smoking process step is not considered as a sufficient heating step.

Allergens handled on site

None
Choose an allergen
Choose an allergen
Choose an allergen
Choose an allergen
Choose an allergen
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Choose an allergen
Choose an allergen
Choose an allergen
Choose an allergen

Product claims made e.g. IP, organic

IKB: FS (farming star/ "beter leven") and GB (= GF + welfare) and GF (good farming) + Qualität und Sicherheit (QS) + Organic (SKAL)



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Product recalls in last 12 Months

No

Products in production at the time of the audit

Bacon, spare-ribs, DMM (desinewed minced meat) and other products from pork middles.



6. Audit Duration Details			
On-site duration	20 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	None		
Next audit type selected	Announced		

Audit Duration Details			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2015-10-12	9.00	17.00
2	2015-10-13	9.00	17.00
3	2015-10-14	9.00	13.00

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
Manager - Plant	X		X	X
Manager - Quality	X	X	X	X
Production Manager	X			X
Maintenance Manager	X		X	X
Maintenance Assistant	X		X	



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Officer	- HR			X	X
Internal Service department	- Supervisor			X	
Spare-ribs department	- Supervisor		X		
Salting/Smoking department	- Supervisor		X		
Supervisor	-		X		
Supervisor	-		X		
Supervisor SMP department	-		X		
Supervisor Magermet department	-		X		
- Supervisor DMM			X		



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Non-Conformity Summary Sheet

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

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



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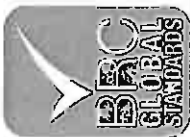
Major							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed	Reviewed by

Minor							
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence document, photograph, visit/other	Date reviewed	Reviewed by
01	1.1.2	Improvement plans documented in X-matrix, including the reduction program on foreign materials. Supporting document shows actual planned actions and related time-scales. Several actions are not carried but justification and/or prioritisation of actions are not clearly	Extra field 'remarks/ decision' add to document. In this field justification and/or prioritization of actions documented.	Root cause: The actual layout of report didn't have the possibility to. Preventive action plan: Week 43: Add field ' remarks/ decision' to X_matrix sheet	- X-matrix sheet 02. foreign bodies	2015-11-06	



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		demonstrable showing that the management team agrees with the current actions running.		Week 44: Describe the justification and/or prioritization of actions. Status: Fully closed.			
02	2.7.1	Internal crate washing process not covered by the hazard analysis/risk assessment.	Internal crate wash department implemented into HACCP-system (including flow chart).	<p>Root cause: Internal crate wash department was not reviewed in HACCP-team.</p> <p>Preventive action plan: Week 43: HACCP-plan and flowcharts Internal crate wash department discussed during HACCP team meeting.</p> <p>Week 45: Internal crate wash department implemented into HACCP-system.</p> <p>Status: Fully closed.</p>	<p>- Actieregister TIER 2 2015 - wk 45.pdf</p> <p>- Flowchart Wasserij.pdf</p> <p>- Procesbeheerplan VION Scherpenzeel 05-nov-2015.pdf, page 3/3</p>	2015-11-06	
03	2.8.1	Inconsistency between risk assessment (central document, P-VION-10000, 29-09-2014) and implemented control measures concerning production of bacon: <ul style="list-style-type: none"> A minimum concentration 	Update 'prerequisite requirement limits' nitrite and nitrate in Prerequisite requirements and Risk assessment;	<p>Root cause: Actual Targets in regulation and scientific literature are not implemented into risk analysis.</p>	<p>- Procesbeheerplan VION Scherpenzeel 05-nov-2015.pdf, page 1/3 & 2/3</p> <p>- VOORSTEL Appendix justification hazard analysis.pdf</p>	2015-11-06	



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	<p>of nitrite (> 1 g/l) and nitrate (>0.5 g/l) is required in any meat injection solution. No nitrates are added to organic products. It is not clearly validated or justified what the consequences are regarding food safety.</p> <ul style="list-style-type: none"> Homogenic injection of the brine (containing preservatives) in the meat is controlled by pressure monitoring injection equipment and planned conductivity measurement by operators. Risk assessment does not include the risk evaluation and reference to the implemented control measures. 	<p>based on actual scientific literature.</p> <p>Add actual control measurement to guarantee homogenic injection of brine into the meat in Prerequisite requirements</p>	<p>Preventive action plan: Week 43: Limits and measurement discussed during HACCP team meeting. Week 45: Revised limits and measurement implemented into HACCP-system Status: Fully closed.</p>	<p>- 151105 Nitiet norm wijzigingsvoorstel email QA centraal.pdf - Actieregister TIER 2 2015 - wk 45.pdf - 151016 EFSA_ effect of Nitrates Nitrates on the Microbiological Safety of Meat products 26-nov-2003.pdf - 151016 WUR_Reductie nitrietgebruik bij bio vleeswarenbereiding.pdf - Insuitpercentage lijn1 05nov2015.pdf</p>		
<p>04 3.1.3</p>	<p>Shift leader spare-ribs is not able to read the Dutch working instruction concerning the metal detector at the spare ribs packing line. As a result he is not able to explain corrective actions in case of malfunctioning of the metal detector and what to do in case of metal detected product as a result.</p>	<p>Make (Training) instruction (4 languages) available on shop floor.</p>	<p>Root cause: Trainings instruction is only available on request. With this system the translated instruction is not direct available on shop floor.</p> <p>Preventive action plan: Week 44: (Temporarily)</p>	<p>- Printscreen Instructions added in - actie op metaaldetectie EN.pdf - Controle op metaaldetectie EN.pdf</p>	<p>2015-11-06</p>	

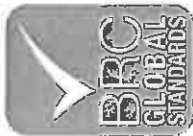


			<p>Add the instruction by the metal detection procedure into 'manual' (digital quality On Shop floor the system is available.</p> <p>Q1-2016: Make instruction server 'read only' for computers on shop floor, so all specific instructions are available on work floor, when necessary.</p> <p>Status: Closed. Follow-up planned introduction of instruction servers at shop floor during next evaluation visit.</p>			
05 3.5.3.2	<p>Maintenance contractor is used for inspection, maintenance and chemical treatment (bacteriostatic) of the cooler blocks every 6 months. The maintenance job which is used to instruct this contractor does not specify the activities (which cooler blocks? What to</p>	<p>Job instruction to clean cooler blocks by Contractors specified, in relation to guarantee the effectiveness in relation to food</p>	<p>Root cause: Current job was not identified as risk in relation to food safety.</p> <p>Preventive action plan: Week 43: Job description in relation</p>	<p>WRE-15039229 - Jaarljks inspuiten koelers NH3.pdf</p>	2015-11-06	



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	inspect and repair? What to clean? Etc.).	safety.	to food safety discussed and approved in HACCP-team. Week 44: Job description for cleaning Cooler blocks implemented. Status: Fully closed.		
06 3.7.2	In Q4-2014, Q1-2015, Q2-2015 en Q3-2015 the Listeria environmental monitoring program shows positive results (line 2 processing area and the bone transport belt DMM). Although the belt motor has been replaced it is not clear why the motor was in such bad state of repair. Extra cleaning of the bone transport belt (correction) has been carried out but no root cause or corrective actions demonstrable to improve the hygiene control effectively. Incomplete PDCA cycle. Also Listeria observed during process monitoring of product (no RTE-product).	Environment results, Listeria add to Period report since report Period 2015-10, including root cause analysis, corrective and preventative actions. To verify the effectiveness the actions taken the exceeding positions will be monitored during two consecutive quarters	Root cause: PDCA by exceeding environment monitoring (Listeria) not demonstrable in current report layout. Preventive action plan: Week 44: - Add Environment (Listeria) monitoring to Period reporting 2015-10. - PDCA Listeria issue Q3-2015 described into separate report. Status: Closed. Follow-up monitoring results Listeria and - in case of any positive results -	- Periode toelichting 1510 kwaliteit.pdf - 151027 Listeria omgeving Q3-2015.pdf	2015-11-06



07	3.8.1	Product found in the cooling cell before line 1/2 which is blocked for usage as a red banner is wrapped around the product. The required label specifying details is missing.	Red tape was used to identify this hooks necessary for calculation department, NOT blocked. Red tape immediately removed and Hooks extra identified by label 'VOOR CALCULATION'	<p>Root cause: For department chefs and foremen's the meaning of using red tape and block procedure was not clear.</p> <p>Preventive action plan: Week 43: - Rewrite 'procedure Blokkeren en vrijgeven' - Modify formulier 'blokkade'</p> <p>Week 44: Instruct departement managers 'procedure Blokkeren en vrijgeven' during weekly Bedrijfs Team meeting.</p> <p>Status: Fully closed.</p>	2015-11-06	- Procedure blokkeren en vrijgeven 05nov2015.pdf - Invulde blokkade Blokkade 05nov2015.jpg	
08	4.7.3	Insulation of drain cooler block just above saw positions line 1 not properly repaired causing	Directly line stopped and condensed water	<p>Root cause: By failure in settings of cooler block and the</p> <p>- Controle staat en condensvorming verdampert begin</p>	2015-11-06		



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	<p>product contamination risks. Also the condensed water is dripping from the bottom of the tray under the cooler block close to the production line (cutting process).</p>	<p>removed. During break temporarily tape replaced by approved tools.</p>	<p>drain was blocked by ice. By this reason the block contains condensed water. AND Responsibilities in relation prerequisite requirements by foremen's and department managers are not clear in those situations.</p> <p>Preventive action plan: The settings of cooler block are reset immediately. After production on Monday the blocked drain is repaired. AND Week 42: Instruct department managers and foremen's their responsibility in relation prerequisite requirements and actions taken. Week 43: Support shop floor by quality department on prerequisite requirements. Week 44:</p>	<p>snijlijn 1.pdf - WRK-15052456_Verdamper begin lijn 1 13okt2015.pdf</p> <p>151103 Verificatie BRC punten.pdf</p>		
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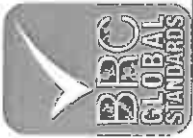


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			<p>Verification Pre requisite requirements by QA department.</p> <p>Status: Closed. Follow-up control on proper functioning of coolers during next evaluation visit.</p>		
<p>09 4.7.6</p>	<p>Several lubrication pistols are stored in the separate storage room for lubricants. The lubrication pistols contain lubricant cartridges. Non-food grade cartridges are labelled red and food grade cartridges. The lubrication pistols are not labelled and its content is not clear for the user. Opening the lubricant pistol to check for the cartridge type is not very likely as it will lead to spill of lubricant.</p>	<p>Lubrication pistols replaced by lubrications pistols with transparent shell.</p>	<p>Root cause: Current lubrication pistols were not identified as potential risk wrong use of the different types of Lubrication.</p> <p>Preventive action plan: Week 43: Order Lubrication pistols with transparent shell. In meantime identification of contain with labels at outside of Lubrication pistols. Week 44: Replace Lubrication pistols by Lubrication pistols with transparent shell.</p> <p>Status: Fully closed.</p>	<p>See attachment Vetspuiten.jpg</p>	<p>2015-11-06</p>



<p>10 4.9.2.1</p>	<p>Knife (E1) with a broken tip found in brine process area. Breakage incident not reported.</p>	<p>Directly replaced by a new complete knife, damaged knife destroyed.</p>	<p>Root cause: Responsibilities in relation prerequisite requirements by foremen's and department managers are not clear. Take not enough time to observe prerequisite requirements by shop floor managers. Preventive action plan: Week 42: Instruct department managers and foremen's their responsibility in relation prerequisite requirements and actions taken. Week 43: Support shop floor by quality department on prerequisite requirements. Week 44: Verification Pre requisite requirements by QA department.</p>	<p>See attachment Controle compleetheid mes Pekkelkamer.pdf 151103 Verificatie BRC punten.pdf</p>	<p>2015-11-06</p>	
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Status: Fully closed.

Comments on non-conformities:

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



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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
4.9.4	No packing of products into glass or brittle containers.
4.10.4	No magnets installed.
4.10.6	No pre-formed packaging container applied. Plastic bags are put inside crates and pallet boxes.
4.11.7	No full CIP-cleaning applicable. Manual flushing and cleaning of the storage tanks and brine supply line.
4.13	No dispatch of surplus food or animal feed.

<p>1. Senior management commitment</p> <p>1.1 Senior management commitment and continual improvement</p> <p>Policy documented in P-SPZ-NL-10058 (22-04-2014) and signed off by the Plant Manager. Latest VION HQ policy dated 28-09-2015 (P.VION-10.009) but still consistent with the local policy.</p> <p>Policy deployment using the so called X-matrix specifying the interaction between objectives, responsibilities, indicators, etc. Evaluation status objectives on a weekly basis. Trend analysis on a quarterly basis. Main objectives related to improvement of OPEX, customer intimacy, sustainability, etc. OPEX translated to reduction of foreign material product contamination, 5S, improvement of the MMM system (quality monitoring system), improvement (visualisation) of traceability system, etc.</p> <p>Annual management review combined with HACCP system verification. Demonstrable for period 07-2014</p>
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– 06-2015 (October 2015) which covers the required topics. Reported:

- complaint level comparable to former years and still slightly exceeding the internal targets. Quantity of returning product has been increased over the years;
- Listeria found in production environment (DMM + cutting lines) + product (DMM);
- 1 CCP deviation reported.

Meeting structure in place like the management team meeting but also the quality meeting which covers quality- and food safety aspects (reviewed minutes meeting 02-03-2015). Monitoring of applicable legislation EU and outside by HQ Vion Boxtel (reviewed implementation recording animal origin as mandatory per 01-01-2015). Digital version of the BRC7 standard available. VION Scherpenzeel has recently subscribed to BRC participation but site is not available yet.

All 10 minorNC's are fully closed, including the minorNC's with status closed.

MinorNC: Improvement plans documented in X-matrix, including the reduction program on foreign materials. Supporting document shows actual planned actions and related time-scales. Several actions are not carried but justification and/or prioritisation of actions are not clearly demonstrable showing that the management team agrees with the current actions running.

1.2 Organisational structure, responsibilities and management authority

Organisational structure documented in P-SPZ.NL-10092 (28-01-2014). Experienced management team.

2 The Food Safety Plan – HACCP

HACCP-team members: Plant manager (team leader), QA-manager, Production Manager, Maintenance Manager and Manager F&A. Competent team of people working for many years in the meat processing industry.

Setup of PRP program centrally by HQ VION Boxtel. Production specification information used as input for the hazard identification/risk assessment. Product suitable for delivery B2B and consumption by general consumer groups. No claims made regarding food safety aspects.

Flow diagrams demonstrable as reviewed for bacon processing (PRO-SP2-NL-10036, 12-08-2008) and brine preparation. Annual verification of flow charts as reported in the combined HACCP-system verification/management review. Verification details of flowcharts are recorded in the document control system (). No reworking or recycling identified.

Relevant information collected, maintained, documented and updated by VION HQ Boxtel (EU and outside EU like US or Japan).

Reviewed:

- Product specification Mechanically Separated Porck Meat (type 3 DMM EU 853) (artr. Nr. 77293, 10-06-2015);
- Product specification (art. Nr. 33013, 05-12-2013).



Hazard identification/risk assessment setup centrally by HQ VION Boxtel based. Risk calculation based on likelihood occurrence and severity of effects (3x3-matrix, P-VION-10000, 29-09-2014) which has to be adapted by the production locations like Scherpenzeel. The generic risk assessment has to be adapted to the local processes and buildings. No allergens on site.

1 CCP identified concerning the temperature of the incoming middles. Critical limits applied: < 7 degrees Celsius (legal EU-limit), < 6 degrees Celsius (raw materials for Japan and < 6 degrees Celsius (other product). When temperature is between action limit and critical limit it is allowed to receive the batch but must be quarantined (QA/management must be informed). Above critical limit batch must be rejected and it is not allowed to receive the batch. Other CP's (food safety control measures at PRP-level) identified (amongst several others):

- Product contamination (product own/foreign materials – slaughter/handling/lubricants/pest control/personal hygiene/etc.);
- Control contamination with condensed water from cooling systems;
- Temperature control during processing (magermet: < 6 degrees Celsius);
- Hygiene recipients (crates, pallet boxes, etc.);
- Procurement raw materials according to specification (incl. additives);
- Control product age (< 5 days after slaughter, according to EU regulation 853);
- Control printing shelf life date;
- Control MAP packing process (< 1,5 O₂);
- Control dosage nitrite as preservative in brine injection (> 1 gram/litre);
- Control vacuum packed products (visual inspection);
- Control injection brine solution (bacon);
- Control cooling down after smoking process (< 24 hours, < 7 degrees);
- Control temperature transportation.

Annual verification of the HACCP-system combined with management review (07-2014 – 06-2015, October 2015).

MinorNC: Internal crate washing process not covered by the hazard analysis/risk assessment.
MinorNC: Inconsistency between risk assessment (central document, P-VION-10000, 29-09-2014) and implemented control measures concerning production of bacon:

- A minimum concentration of nitrite (> 1 g/l) and nitrate (>0,5 g/l) is required in any meat injection solution. No nitrates are added to organic products. It is not clearly validated or justified what the consequences are regarding food safety.
- Homogenic injection of the brine (containing preservatives) in the meat is controlled by pressure monitoring injection equipment and planned conductivity measurement by operators. Risk assessment does not include the risk evaluation and reference to the implemented control measures.

3. Food safety and quality management system

3.1 Food safety and quality manual

IT-system used for document control. Documents available to personnel using the intranet.

MinorNC: Shift leader spare-ribs is not able to read the Dutch working instruction concerning the metal detector at the spare ribs packing line. As a result he is not able to explain corrective actions in case of malfunctioning of the metal detector and what to do in case of metal detected product as a result.



3.2 Documentation control

Authorisation of documents based on system functionality. Some documents available in relevant documents as several employees of different origin are working for the company. The MMM (multi-moment-measurement) quality control system (monitoring of meat processing according to specifications) is based on photographs (for example showing the right cut of the meat processes).

3.3 Record completion and maintenance

Records are archived for 5 years according to procedure. Maximum product shelf-life applied is 2 years.

3.4 Internal audit

Audit management by the system. There are schedules of internal audit against documented procedures, carried out by trained auditors (VION auditor pool). Twice a year the production site and involved departments are audited. There is a schedule for the internal audits according to procedure 'interne audits' (P-VION-10011).

Reviewed/assessed:

- Internal audit covering crate washing process and expedition (, 19-03-2015)

Weekly internal inspection covering inspection of hygiene of equipment and facilities and fabrication inspection as well. Every so called pre-SSOP inspections are carried out to verify status of hygiene (after cleaning), integrity of breakable items, relevant control points related to quality/food safety, etc.

Reviewed/assessed:

- Pre-SSOP's of processing areas: spare-rib, bacon (salting, smoking. Incl. hygiene brine micro sieve), cutting lines (inspection cooler blocks on functioning and condensation).

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

Risk identification/risk assessment related to raw materials setup centrally by HQ VION Boxtel resulting in product specifications specifying relevant aspects to quality and food safety. Approval of suppliers based on GFSI-certification (procedure S-MMI-1-10190, 10-2015). All suppliers of packaging have to be approved by the central VION office entered into the system () before they are allowed to deliver. No questionnaires used. No supply of raw materials by brokers.

Reviewed/assessed:

- Specifications raw materials used for DMM meat (specification according to EU Re 853):
 - 78153 (pressed bones), only VION slaughterhouses;
 - 48623 ("staartbeenderen"), only VION slaughterhouses;
- Risk assessment additives like pepper used for flavouring meat product for Japanese market (SDP). Relevant contaminants and micro-organisms specified, including Clostridia.
- BRC6-certificate (supplier pepper), expiry date 08-01-2016.

3.6.2 Raw material and packaging acceptance and monitoring procedures



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Procedure P-SPZ-10030 (31-01-2014). Temperature control incoming meat batches (pork middles, raw materials DMM, etc.) are controlled as CCP. Identification of IP-status pork middles by coloured labelling (organic = green, farming star = orange, GB/GF/QS = blue). Also slaughterhouse specification by coloured labelling (determining further processing according to customer specification). Verification of slaughter date and origin at reception of meat batches. Meat guiding documents are verified by the gate keeper and must be approved before trucks are unloaded (according to procedure dated 21-07-2015 about verification countries of dispatch final products).

Assessed/reviewed:

- Delivery pork middles Vion Boxtel (2784).

3.5.3 Management of suppliers of services

Services suppliers identified: pest control (), laundry (), maintenance (several contractors involved, including cleaning of cooler blocks), transport (, controlled by VION HQ Boxtel), (frozen) storage (final products), laboratory services, catering, crate washing (), waste.

Reviewed/assessed:

- Work support (work agency on-site): contract 01-03-2012;
-
- Cleaning of cooler blocks
- Facility- and equipment cleaning (26-02-2013).

MinorNC: Maintenance contractor is used for inspection, maintenance and chemical treatment (bacteriostatic) of the cooler blocks every 6 months. The maintenance job which is used to instruct this contractor does not specify the activities (which cooler blocks? What to inspect and repair? What to clean? Etc.).

3.5.4 Management of outsourced processing and packing

Freezing of some final products (incl. DMM) is outsourced to logistic partners based in specification as laid down in contracts.

Assessed/reviewed:

- : BRC S/D certification + specification. Contract includes requirements concerning the freezing process.

3.6 Specifications

Control of specification by VION HQ Boxtel. Specifications reviewed cover relevant aspects concerning quality and food safety.

Reviewed/assessed:

- Specifications raw materials used for DMM meat (specification according to EU Re 853):
 - 78153 (pressed bones), only VION slaughterhouses;
 - 48623 ("staartbeenderen"), only VION slaughterhouses;
- Specification final products:
 - Product specification Mechanically Separated Porck Meat (type 3 DMM EU 853) (artr. Nr. 77293, 10-06-2015);
 - Product specification (art. Nr. 33013, 05-12-2013).



3.7 Corrective and preventive actions

Reviewed corrective actions related to internal audits, objectives, microbiological hygiene monitoring, environmental monitoring, product monitoring, etc. Different document and systems are used, no central recording of PDCA-cycle concerning deviations/non-conformances.

MinorNC: In Q4-2014, Q1-2015, Q2-2015 en Q3-2015 the Listeria environmental monitoring program shows positive results (line 2 processing area and the bone transport belt DMM). Although the belt motor has been replaced it is not clear why the motor was in such bad state of repair. Extra cleaning of the bone transport belt (correction) has been carried out but no root cause or corrective actions demonstrable to improve the hygiene control effectively. Incomplete PDCA cycle. Also Listeria observed during process monitoring of product (no RTE-product).

3.8 Control of non-conforming product

Procedure P.SPZ-NL-10010 (22-04-2009). Identification of non-conforming product using a label. Also a red banner is used to for identification of hooks with meat in case of non-conformances (in cooling cell). Supervisor and production manager are responsible for use or disposal of concerning products (printed on the label used for non-conforming products).

MinorNC: Product found in the cooling cell before line ½ which is blocked for usage as a red banner is wrapped around the product. The required label specifying details is missing.

3.9 Traceability

Hooks with meat received are traceable by the labels which have to verified at reception of the batches. Other raw materials are received by internal services department managing the warehouse where raw materials other than meat and packaging materials are stored. Batch information of non-meat raw materials and packaging materials are recorded and linked to a week number. Internal service department is responsible for distribution of raw materials and packaging materials to the processes. As the transition from one to another batch code of raw material (for example pepper) is not recorded consistently this procedure may lead to a higher level of traceability accuracy. Final product traceability by recording production and for some products additional batch information on the packing label.

Traceability test carried out related to batch DMM (art. Nr. 77293) delivered from warehouse (outsourced frozen storage) to a customer. Production dates DMM 03-03-2015, 04-03-2015, 05-03-2015 and 06-03-2015 were involved. Based on common production efficiency figures (dispatch bones) a quantity check was carried out covering production date 06-03-2015 and results were satisfactory. Information traceability test was available within 4 hours.

Last traceability test was carried out as part of an internal audit in 2015.

3.10 Complaint handling

Complaints are received and any complaints which are considered to be attributable to the process/product are communicated and investigated. All complaints are trended and reviewed. Focus software is used for complaints. Complaints are discussed in the Level 1 meetings (= Tier meeting). Target set: 2 complaints/100 tons of product. Most important complaint categories are packaging damages and foreign material product contamination (mainly report by the Japanese market). Company objective set in 2015 to reduce the contamination with foreign materials.

3.11 Management of incidents, product withdrawal and product recall



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There is a recall procedure from the VION concern which covers the process and which is applicable for all operations. A combined recall test is reported on 056-05-2015. No actual recalls in 2015.

3.12 Customer focus and communication

Specific customer requirements are translated into process specifications. Sampled the process specification related to the spare-ribs for the US market (PGI, specification dated 04-12-2010, art. Nr. 75313). Correct settings of the vision camera system was shown (size spare-ribs) and selection criteria were clear to the operator visually monitoring the spare-ribs during the packing process for PGI.

A separate production is built for the Japanese market (SDP production line). Requirements to cutting specifications, temperature control, X-ray, etc. are respected as reviewed based on sampling during the audit. Pork middles received from slaughterhouses are supplied on hooks with purple labels.

4. Site standards

4.1 External standards

The site has been designed and constructed for its activities at an industrial area. There are no local activities that are expected to have an adverse effect on the activities under scope. The TD department and storage of packaging materials is located in a separate building across the street. Site area is fully paved.

4.2 Security

Site fully fenced and 24 hour security in place. Site area is shared with another company. Entrance to the building using badges. Verification is issue and return of badges, especially for temporary workers. Not returned or missing badges will be blocked to prevent uncontrolled access to the production- and storage facilities. Laser detection system with camera support installed around the main production building to warn production management in case of unexpected activity around the building. Bulk storage tank for salt is fenced and locked. Raw materials and packaging materials warehouse has to be locked manually.

Porter present at entrance point trucks. Visitor reporting system implemented in the office building. Site entrance close to the office building is closed outside office hours (only entrance to the site after reporting at the porters lodge).

Meat processing company recognized by the Dutch authorities (NVWA) and approved according to EU-legislation (NL 82 EG).

4.3 Layout, product flow and segregation

The production and storage zones have been defined and based upon a risk assessment all zones are categorized as low risk areas. All product have to undergo a full cooking step prior to consumption. Site map demonstrable specifying routing of personnel, materials, etc. Logic product flow across the building. Production lines are located in fully or semi-separated rooms (cutting/deboning, DMM, bacon, spare-ribs, "magermet"). Separate maintenance workshop and crate cleaning facility.

Visitors and contractors are instructed prior to entering production- and storage facilities.



4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Walls, floors and ceilings are finished, suitable and maintained. Limited use of process water and manual cleaning. Sufficient drain points. External doors are close-fitting. Lighting and windows are protected where they pose a risk to the product. Pre-SSOP inspections prior to production incl. checks on status breakable items. Control of cooler blocks hanging around the building is a CP (inspection (pre SSOP), periodic cleaning/inspection/maintenance) to prevent condensed water contaminating the product.

4.5 Utilities – water, ice, air and other gases

All utilities for water, ice and heating devices (slaughter department) are covered by the maintenance system.

Both water from the mains and well water are used. Water streams are mixed up. Well water filter installed which is inspected every week as part of the maintenance program. Water used for brine is only coming from the mains (no well water applied). Well water quality is monitored as required by law (4x/year). A water distribution plan is available. Sampling tap point (water supply salt silo + "slibsilo" (latest point of distribution) on a quarterly basis. No deviations reported.

Compressed air used for drying of equipment after cleaning. Food grade oil applied. Maintenance air compressors by contractor . Monitoring of the air compressors also part of the maintenance program (water-/oil separation, drying, etc.). Filters installed in the air supply and maintained by . Daily inspection of any oil leakage in the compressed air as part of the pre-SSOP inspections (CP). Also inspection and maintenance (incl. cleaning and anti-fungal treatment of the cooler blocks) is a CP.

CO2 used for MAP-packing and cooling (direct injection) is suitable for food use.

Assessed/reviewed:

- Water analysis results Q2/Q3-2015 (tap points).
- Maintenance of air compressors (filter specifications).
- Maintenance of water filter (08-10-2015).

4.6 Equipment

Equipment designed for meat processing industry. Mainly stainless steel equipment.

4.7 Maintenance

Maintenance management system based on IT system. If possible any maintenance activities are clustered and executed every week on Saturday outside production hours. Communication to production officer to ensure cleaning prior to start-up to prevent contamination. Pre-SSOP checklist are used to record en confirm cleaning where necessary. Maintenance contractor instruction demonstrable.

Maintenance workshop inside the production building. Maintenance activities causing contamination risks carried only at the first floor. Separate storage room lubricants. Only green labelled lubricants are food grade and suitable for food safety critical applications. Only entrance to the maintenance workshop using a batch. Only pre-organised maintenance suitcases are allowed to be used inside production- and storage facilities.



Reviewed/assessed:

- Maintenance/inspection/cleaning of cooler blocks (contractor i)
- Maintenance of pressure sieve DMM-department (04-10-2015). Inspection of sieve specifications.

MinorNC: Insulation of drain cooler block just above saw positions line 1 not properly repaired causing product contamination risks. Also the condensed water is dripping from the bottom of the tray under the cooler block close to the production line (cutting process).

MinorNC: Several lubrication pistols are stored in the separate storage room for lubricants. The lubrication pistols contain lubricant cartridges. Non-food grade cartridges are labelled red and food grade cartridges. The lubrication pistols are not labelled and its content is not clear for the user. Opening the lubricant pistol to check for the cartridge type is not very likely as it will lead to spill of lubricant.

4.8 Staff facilities

Central suitable staff facilities for both internal and external employees. Lockers available for private clothing and items. No storage of protective clothing in the lockers except for protective shoes. Boot wash installed at the entrance to production facilities. Direct access to production facilities. Also personally issued body protection (worn underneath the clean protective clothing) may be stored in the locker. Hygiene corridor at the entrance of production facilities. Toilets are located near the changing facilities. Closed smoking room in the canteen area.

4.9 Chemical and physical product contamination control

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

4.9.1 Chemical control

Approved chemical list demonstrable. Separate storage are for cleaning chemicals which can only be accessed using a batch. MSDS and products specifications available of sampled products.

Reviewed/assessed:

- . Anti-fungal treatment cooler blocks (registration number
- . Cleaning/disinfection of knives using dishwasher after sharpening knives.

4.9.2 Metal control

Knives are issued to employees by numbered sets and changed every break for cleaning. Integrity check of knives not returned every break are covered by daily pre-SSOP inspections.

MinorNC: Knife (E1) with a broken tip found in brine process area. Breakage incident not reported.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Quarterly glass audits are carried out periodically. Daily verification of breakable items during pre-SSOP inspections. Procedure management broken items complies with requirements.



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4.9.4 Products packed into glass or other brittle containers

Not applicable.

4.9.5 Wood

No wood is allowed at the production departments, except the wood pieces for smoking bacon. These are stored and used separately.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Metal detection (products), sieves (injection fluid, water), X-ray (products) applied. Vision camera system not validated to remove foreign materials (control of quality aspects).

4.10.2 Filters and sieves

Filters used to control the hygiene of the brine to prevent any obstruction of injection needles (with the risk of insufficient injection at certain areas of the meat pieces). Cleaning as part of the cleaning program executed by Assembling of the micro-sieve of the injection equipment by the team leader after hygiene inspection as recorded on the pre-SSOP-list as reviewed during the audit.

Well water filter installed is inspected every week as part of the maintenance program as reviewed.

4.10.3 Metal detectors and X-ray equipment

Metal detectors installed at:

- Packing line JK/VM12/VM14/"magermet"/smoking process: 5,0 mm Fe + 6,0 mm non-Fe + 6,35 mm SS (check start-up, every 3 hours and end of production);
- Salting process 1 and 2: 5,0 mm Fe + 6,0 mm non-Fe + 7,94 mm SS (check start-up, every 3 hours and end of production);
- Spare-rib process line: 3,5 mm Fe + 4,5 mm non-Fe + 6,00 mm SS (check start-up, every 3 hours and end of production);
- SDP/China lines: 3,5 mm Fe + 3,0 mm non-Fe + 4,5 mm SS (check start-up, every 3 hours and end of production);
- DMM process line: 6,00 mm SS (check start-up, every 3 hours and end of production).

Also metal detection applied by contractor (frozen storage). Metal detector functioning is checked using sample sticks. Both belt stop systems and rejection devices used depending on the packaging size. Procedure metal detection documented on registration form F-SPZ-NL-10072 (30-07-2015).

X-ray system installed at SDP packing line (incl. rejection system). Verification proper functioning of the equipment by testing samples at start-up, every 3 hours and at the end of production:

- 1 mm glas;
- 1 mm ceramic;
- 0,5 mm metal.

4.10.4 Magnets

Not applicable.



4.10.5 Optical sorting equipment

Vision camera system installed at spare-rib packing line. System used for monitoring quality aspects (size), not foreign materials. As reviewed during the audit system settings are controlled by recipes which correspond with the customer specific requirements.

Reviewed/assessed:

- Settings vision system for (art. Nr. 75313).

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

Not applicable.

4.11 Housekeeping and hygiene

Both equipment- and facility cleaning subcontracted to . Cleaning program demonstrable including working instructions for specific equipment (11-2012). Cleaning materials are also part of the cleaning program.

Verification cleaning activities by pre-SSOP-inspection every day at every department carried out by team leaders. Approx. agar samples every 2 weeks. Results 2015 show controlled cleaning. Listeria swabs taken quarterly. Repetitive positive results found at deboning-/cutting line 2 and bone-transport belt DMM. Although extra deep-cleaning has been carried out root cause to contamination of DMM line has not been determined.

Assessed/reviewed:

- Cleaning instructions sieve system injection equipment (bacon production line).

4.11.7 Cleaning in place (CIP)

Not applicable.

4.12 Waste / waste disposal

Correct collection and identification was demonstrated. Dispatch of cat. 2 and cat. 3 materials to authorized processing companies (). Other waste stored on-site and collected separately by

4.13 Management of surplus food and products for animal feed

Not applicable.

4.14 Pest Control

Pest control outsourced to using the digital website . 8 Visits/year. Focus on rodents and flying/crawling insects. Application on non-tox detection equipment inside and outside the production and storage facilities as well. No issues reported in 2015, except for detection of mice in technical service areas (maintenance and production). Proper follow-up of recommendations by the pest controller as demonstrable by dashboard on the website. In-depth inspection carried out by on a



quarterly basis.

4.15 Storage facilities

At the production facility cooling areas have been defined. Temperatures control system implemented (frozen and cooled) including temperature alarm settings. External storage is applied for e.g. DMM. DMM is transported at a temperature below 2 degrees and is then frozen to below -18 degrees by an external cold store. Also salted bacons are stored at an external cold store. A separate building is applied for the storage of packaging and other raw materials. No outside storage, except for dirty crates. Warehouse/cold store contractors are

Reviewed/assessed:

- Contract (28-12-2012) and BRC food certification.

4.16 Dispatch and transport

Dispatch and release of products is based on temperature verification (CP). Approved transport companies are listed. Contracts, managed by the logistic / supply chain department at the corporate VION organisation, is covering the requirements of the BRC 6 standard related to transport. Transport is organised and scheduled by the Service desk. They are only using approved transport and storage contractors Trucks are inspected for hygiene and temperature before loading. Results of this inspection are recorded at the CP control forms. There's a schedule for audits of the transport companies and a verification of the cleaning by agar samples program.

Reviewed/assessed:

- Approval main transport company: IFS Logistics (), IFS Logistics () and BRC S/D ().

5. Product control

5.1 Product design/development

No new product developments identified. The product development process is managed centrally within the VION Food organisation. Any new process validation is carried out by Vion HQ Boxtel as part of project management process. Local HACCP-team will be involved in case of new product introductions or new or changed processes.

5.2 Product labelling

Verification of shelf life period recorded on labelling based on CP. No full automatic labelling of packed product identified. No packing of consumer products (only B2B). Product labels are printed based on article numbers and labels have to be printed per packed unit. No functional product claims made.

5.3 Management of allergens

No allergens on-site. Verification specification non-meat raw materials is part of the supplier approval process.



5.4 Product authenticity, claims and chain of custody

Segregation and correct identification is established for several meat quality categories (so called quality lines):

- organic pork (SKAL certified). Identification: green label, last number art. Nr. = 7;
- Farming star ("beter leven"). Identification: orange label, last number art. Nr. = 5;
- GB, (= good farming including welfare requirements for UK clients). Identification: blue label, last number art. Nr. = 6;
- GF (IKB certified). Identification: blue label, last number art. Nr. = 3;
- QS (qualität und Sicherheit, for German market. The organisation. Identification: blue label, last number art. Nr. = 4/8.

Certification of GF, GB by certification body and FS by All the meat products are produced based on EG 82 approval number, incl. the regular meat (called TS "standard"). Recently Vion Scherpenzeel is certified according to the CoC (Chain Of Custody) scheme. Risk assessment and execution of mass balance exercises are scheme requirements.

During the audit is checked how the status of quality lines is verified and segregated at the intake department and several production departments ("magermet", cutting/deboning, etc.) like the labelling of meat hooks, the identification of product lines, the production sequence (starting with high quality lines followed by lower quality lines), colour coding of recipients to prevent exchange of meat categorised in different quality lines, etc.

Clear procedures are implemented concerning the verification of the quality line and how to downgrade the quality lines as generally the demand of certain quality lines is lower than the availability of meat categorized in higher quality lines. Downgrading quality lines is the responsibility of trained and qualified personnel. The downgrading is allowed following the sequence: FS -> GB-> GF -> QS -> ST. At the MSM department also organic categorised meat can be downgraded. Upgrading is not allowed.

Mass balances are made on a weekly base for all quality lines.

Also countries of destination can have their own requirements (like US/Canada (USDA), Korea, Japan, etc.). Dutch authorities (NVWA) issue certificates on batch level.

5.5 Product packaging

A colour system for dolav bags is in use for some clients/ products (purple for Japan, orange for FS). For others mostly bleu is used in dolavs. Packaging materials are stored separately from production materials and part used packaging is covered prior to returning to the storage area. Packaging materials have to comply with EU 1935/2004 (specification review/approval process).

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Product monitoring based on EU Re 2073 and interpretation guide (infoblad 85 issues by the Dutch authorities, NVWA) laid down in procedure P-FOOD-10008 (13-05-2015, revision 11). Both product criteria and process hygiene criteria set by legislation are translated to the monitoring program as reviewed based on sampling. Listeria positive samples found during monitoring of DMM in 2014/2015 (internal requirement). DMM is used in meat products which have to be heated prior to consumption.



Shelf life testing based on TPC en Enterobacteriaceae.

Assessed/reviewed:

- microbiological monitoring program DMM according to Re 853 (section V, chapter III, attachement III) to be used as meat preparation: TPC, E. Coli, St. Aureus, Salmonella spp, Liseria Monocytogenes. Results 2015.
- Shelf life verification micro-biologic analysis art. Nr. 47410 (MAP packed product, 12 days shelf-life). 09-03-2015.

5.6.2 Laboratory testing

No internal lab. Microbiological analysis carried out by accredited lab

5.7 Product release

No positive release. Product temperature verification prior to dispatch required. For some destination countries some additional requirements are applicable.

6. Process control

6.1 Control of operations

Multi moment measurement (MMM) system implemented. Team leader take a predefined number of sample during their shift and compare the processed product to reference pictures to verify compliance to customer or internal specifications. Results are reported on score-boards. In case of scores exceeding predefined limits containment actions and where necessary corrective actions have to be taken.

Recipes identified at spare-rib department and brine processing (injection). Pork middles received are labelled to be able their specification for further processing (destination of batches linked to internal or customer specifications). CCP (temperature verification reception of goods) and several CP's regarding food safety control implemented. Temperature control system in place for monitoring temperature processing, packing and storage areas.

Assessed/reviewed:

- MMM cuttings/deboning department.
- Verified process management system with recipe (brine, batch 3129)

6.2 Labelling and pack control

Verification of shelf life period recorded on labelling based on CP. No full automatic labelling of packed product identified. No packing of consumer products (only B2B). Product labels are printed based on article numbers and labels have to be printed per packed unit. Pre-printed labels not used are thrown away. Pre-SSOP checks carried out every day prior to packing of products. During packing frequent verification of labelling.

Reviewed/assessed:

- Verification labelling SDP packing line.



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6.3 Quantity, weight, volume and number control

No packing of consumer products. Weighing of products using calibrated scales.

6.4 Calibration and control of measuring and monitoring devices

Calibration of equipment part of the maintenance program. Manual equipment calibrated by QA-department. No reference equipment identified. Verification accuracy temperature measurement devices by measuring ice and boiling water.

Reviewed/assessed:

- Calibration of scale (line 1), 07-2015;
- Handheld thermometer (24b – "magermet"-department), 28-08-2015);
- Handheld thermometer (4U – CCP), 29-09-2015);
- Temperature measurement device cooling cell DMM (T2);
- (O2-monitoring).

7. Personnel

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

Introduction training available in several languages. Training held for both internal and external workers in an instruction room. Examination afterwards. After introduction training department supervisor must identify and request the required training to HR-department. HR process checklist used to control the process steps concerning the introduction of any new employee. Overview of training provided to employees demonstrable and updated every week.

Reviewed/assessed:

- Introduction training of external workers and (both 15-09-2015).
- Metal detection training: (23-04-2015)

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

All personnel are instructed about the documented hygiene standard prior to commencing work, including temporary personnel, visitors and contractors. The wearing of any jewellery isn't allowed. Plasters are batch tested.

7.3 Medical screening

Employees, visitors and contractors have to complete a health questionnaire prior to entry to any production areas, updated every 5 year. Procedures are established for personnel to notify management of infectious conditions they may be suffering from or been in contact with. The site makes all visitors, new starters and contractors aware of the need to report infectious disease during the intake by the porter before entering the site. In case of a disease the company is consulting a specialised company doctor. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.



7.4 Protective clothing: employees or visitors to production areas

The laundering of protective clothing is outsourced to a contracted and specialised laundry

The wearing of sleeves, aprons and work coats isn't allowed during eating, smoking and using the toilets.. White protective shoes are worn (and washed before entering (boot wash) and after leaving (manual cleaning) production).

Disposable hair nets are in use; beard snoods are in use. Cleaning facilities are provided. Knives and metal gloves are washed internally following a manual cleaning procedure incl. disinfection.

Traded Goods Module

Scope

8.1 Approval and performance monitoring of manufacturers/packers of traded food products

Not applicable.

8.2 Specifications

Not applicable.

8.3 Product inspection and laboratory testing

Not applicable.

8.4 Product legality

Not applicable.

8.5 Traceability

Not applicable.