Audit Report

Global Standard for Food Safety Issue 7: July 2015

1.Audit Summary

Company name	**VION Food Nederland BV**	BRC Site Code	**1886989**
Site name	**VION Tilburg BV**		
Scope of audit	**The slaughtering of cattle and the deboning, cutting to specification and packing (foil or vacuum) of beef. The production and packing (foil or drum) of slaughter by-products, semi-processed scalded stomachs and salted intestines.**		
Exclusions from scope	**No**		
Justification for exclusion	**N/A**		
Audit Finish Date	**2017-05-19**		
Re-audit due date	**2018-05-19**		

Voluntary modules included

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

2. Audit Results

Audit result	**Certificated**	Audit grade	**A**	Audit type	**Announced**
Previous audit grade	**A**	Previous audit date	**2016-05-19**		

Number of non-conformities	Fundamental	**0**
	Critical	**0**
	Major	**0**

3.Company Details

Address	**Enschotsestraat 28 5013 BD Tilburg**		
Country	**The Netherlands**	Site Telephone Number	**+31 0 13 462 08 00**
Commercial representative Name		Email	**@vionfood.com**
Technical representative Name		Email	**@vionfood.com**

4.Company Profile

Plant size (metres square)	**10-25K sq.m**	No. of employees	**51-500**	No. of HACCP plans	**1-3**

Subcontracted processes	**No**
Other certificates held	ISO 9001, SKAL
Regions exported to	**Europe** **Asia** Choose a region Choose a region Choose a region Choose a region
Company registration number	**NL 87 EG**
Major changes since last BRC audit	**Addition of the processing of first stage of natural casing (cleaning/ salting of bovine intestines).**

Company Description

VION Tilburg B.V. is a cattle slaughterhouse and industrial butcher. It's one of the sites of VION Food NL. The location is VWA approved (NL 87 EG). VION Tilburg B.V. produces beef products and the slaughter by-products (like organs, processing of stomachs (scalding) and the processing of first stage of natural casing (cleaning/ salting of bovine intestines)). The animals are bought by VION Rundvee B.V. at the general market. The capacity of slaughtering is about 400 cows and bulls per day. Currently the market is out of balance. The last months a double amount of cattle is slaughtered as a result of the forced National reduction of cattle). During this visit a regular amount was processed. In addition to slaughtering fresh beef (50 cows a day) can be purchased ("bijkoop"). However, this was very limited. The cutting department is supplied by pre-selcted carcasses and very first cutting. The department includes about 3 main routes (forequarter, hindquarter and butcher handling). There are many equivalent activities (deboning, cutting to specification). Packing is at semi-bulk level (no consumer packed items). The beef is packed loose in crates/ dolavs or vacuum packed. The by-products are packed loose in crates/ dolavs or vacuum packed. The main customers are operating companies in the VION Food Group, retailers related processing within the Netherlands and Europe, and business to business in Asia. The site is situated at an industrial area near the centre of the town Tilburg. The oldest part of the building is from 1920. In 2006 a new building for the cutting and packing departments has been constructed. The beef trimmings are sent to an external provider for freezing, packing and final storage. This service provider is GFSI certificated for its activities. VION Tilburg B.V. is certificated against ISO 9001:2008 (multi-site certification) and holds SKAL approval (001997).

At the moment the company employs approximately people (including subcontracted personnel)The production takes place in one shift. The surface is 15000 K sq. meters and the used quality system is based on two HACCP-studies.
Some products from sister VION company in Enschede can be cross-docked in Tilburg

5.Product Characteristics

Product categories	01 - Raw red meat Category Category Category Category Category
Finished product safety rationale	Cooled red meat and by-products. Beef intended for further raw processing is under a positive release regime.

High care	No	High risk	No	Ambient high care	No

Justification for area	Appendix 2 has been applied. In general beef and by-products are heated in one of the next stages of processing at the customer. Beef intended for further raw processing and consumption is under a positive release regime.

Allergens handled on site	**Milk** Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	**Organic**
Product recalls in last 12 Months	**No**
Products in production at the time of the audit	**Beef carcass (own slaughter), deboned technical parts of hindquarter and forequarter. Cuttings to specification (longhaas, broekstuk, rump, rundersnippers, vet, bovenbil gevliesd, sucade etc). By-products: liver, heart, tongue, Semi-processed by products: scalded stomachs and salted intestines.**

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	**In line with newest audit duration calculator.**		
Next audit type selected	**Announced**		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	**2017-05-17**	**7:00**	**15:30**
	2017-05-18	**7:00**	**16:00**
	2017-05-19	**8:00**	**12:30**

	Auditor (s) number(s)	Names and roles of others
Auditor Number		**, lead assessor**
Second Auditor Number	**N/A**	**auditor under training**

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
/ Production Manager	X		X	X
/ QA Manager	X	X	X	X
/ Foreman slaughtering department		X		
/ Foreman slaughtering department		X		
/ foreman first cuttings		X		

/ Head deboning and cutting department		X		
Supporting Foreman d & c department (process sections)		X		
/ chief Expedition		X		
/ Chief maintenance		X		
/ werkvoorbereider TD		X		
/ Manager P&O			X	
/ sales representative Beef			X	
/ QA assistent	X	X	X	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	3.9	At the packaging storage department which makes the foils available for packing a registration is kept for the lots in use. For the two selected items one of them the record was not complete. The date of the start of use was not	Complete document with missing information (start using date).	Not enough knowledge/ awareness with involved operator. Instruction responsible	Evidence of training 30-05-2017.	2017-06-12	\ Fully Closed

		recorded (foil 700645/ form F10117).		employee.			
2	4.1.2	Next to the entrance of the chiller for carcasses an outside enclosed area is situated in between the walls of the building. This area is overgrown with plants and the branches and leaves reach towards window level. This area is not regularly tended.	Overgrow is removed.	This area could not be reached easily. 1. Placing new door for entrance "square-garden". 2. Removing the overgrow. 3. Management decision future "square-garden" (31-12-17).	Picture of empty area.	2017-06-12	Fully Closed
3	4.3.2	A site map is available and updated on 4 May 2017. However, the recently changed area for processing intestines is not reflected correctly on this site map and the routes of movements are not indicated.	New map ordered and completed	The updating of the map was missed. Yearly follow up by QA manager.	Picture of updated site map (6-06-2017).	2017-06-12	Fully Closed
4	4.4.1	The window frame shows damage and missing of finishing seals. Accumulation of dirt is not prevented and cleaning can be more difficult.	The window frame is repaired / completed.	The daily Pre-SSOP control slaughter department was not complete. Instruction responsible employees.	Picture of repaired window frame. Evidence of training of employees for Pre-SSOP.	2017-06-12	Closed, will be subject of next visit.

				Part of control daily Pre-SSOP control slaughter department.			
5	4.5	In general the cooled storage areas are monitored during day time for the presence of condense. At storage area E11 condensed drops were falling from the piping/ cooling section. This route is applied for transfer of carcasses towards the first cutting section. No product contamination was met.	Implementation of P-TIL-NL-10058. (= removal of condens when observed)	Not enough knowledge/ awareness with involved operators. Instruction employees working in this section (P-TIL-NL-10058).	Doucument P-TIL-NL-10058	2017-06-12	Closed, will be subject of next visit.
6	4.6	An electric sawing device is used at the slaughter department, section treatment of identified carcasses with defects ('opknapbordes'). The saw in use showed loosening of the outside rubber covering. The risk of product contamination by equipment is not minimised.	Directly replaced the saw with the "damaged" rubber covering.	Not enough awareness with involved operators. Instruction employees by publications.	Picture of published minor NC and how to act in case of.	2017-06-12	Closed, will be subject of next visit.
7	4.9.5	At the department for processing of intestines and scalding stomachs bags of salt were available and stored on a wooden pallet. No specific monitoring or exception was defined.	The wooden pallet was removed directly during the audit..	Not enough awareness with involved operators. Instruction employees by publications.	Picture of published minor NC and how to act in case of.	2017-06-12	Closed, will be subject of next

		Wood should not be used in open product areas.					visit.
8	4.11.1	At the cutting department **metal detection is applied at** CP level. During the test of this device test rods are applied. The test rods were not cleaned after the test (test rods are placed in the beef products) and stored within the record holder. The related instruction P100161 does not refer to cleaning of the test rods.	Start directly with cleaning and disinfection of the test rods.	Not enough knowledge/ **awareness with** involved operators. Instruction incomplete. Instruction of employees working in this section.	Updated instruction 22 May 2017. P-TIL-NL-10061	2017-06-12	Closed, will be subject of next visit.

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

The Production leader demonstrated commitment by explaining the policy and objectives. He is also a member of the HACCP team and leading the daily operational meetings.

Yearly objectives have been defined and communicated with the employees. A so called X-matrix supports the control.

The yearly verification includes quarterly verifications (Q3 2015, Q4 2015, Q1 2016, Q2 2016). This includes the follow-up of the objectives.

The objectives for 2016 have been reached. The objectives for 2017 focus on the control of processing of intestines (flushing, cutting, salting, packing) as a semi-finished product as a base for natural casing production.

The Q1 2017 verification report was discussed in detail. The year report July 2015 – June 2016 complies.

Because of the absence of the Site Manager the opening and closing meeting of the audit was attended by the Production Manager.

1.2 Organisational structure, responsibilities and management authority

An organisation chart reflects the organisational structure. In case of the VION employees at middle and higher level job description are defined (responsibility and authorities).
On operational level the procedures defines details about decisions and follow-up.
A competence matrix reveals skills per employee.

Details of non-applicable clauses with justification

Clause reference	Justification

2 The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical and physical risks for all steps in the production process, packing material and general elements. The HACCP team consists of: Plant Manager, Production Manager, QA Manager, Departmental Managers (HR, Cutting, Slaughtering, and Expedition) and Manager Maintenance. The HACCP team meets every week.

Flow diagrams are prepared and available in . All process steps were shown. The accuracy of the flow diagrams is verified in the summer period.

CCP' s which are determined, including critical limits:

- CCP 1: Faecal contamination of carcasses; Zero tolerance for visible faecal contamination just before the carcass cooling step.
- CCP 2: Temperature control of cooled (vacuum) packed beef and by-products at dispatch (Expedition) core temperature of beef <7°C, internmediate surface contact temperature of vacuum packed cooled beef <6°C, core temperature of animal by-products <3°C, surface contact temperature of vacuum packed animal by-products <2°C
- CCP 3: Temperature control of external slaughtered cattke (carcasses) of approved suppliers. core temperature of beef <7°C, and (returned) cooled / vacuum packed beef and by-products. internmediate surface contact temperature of vacuum packed cooled beef <6°C, core temperature of animal by-products <3°C, surface contact temperature of vacuum packed animal by-products <2°C
- CCP 4. Removal of spinal cord at the slaughter department. Zero tolerance for visible spinal cord or husks of spinal cord just before the carcass cooling step.

Records are kept with the help of HACCP logs. A daily verification of the forms is conducted.

An overall process control plan is defined. This includes CCP's, CP and general control measures.

The yearly verification is part of the quarterly reports for the period July 2015- June 2016. Q1 2017 report was discussed for actual results.

Details of non-applicable clauses with justification	
Clause reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

All documentation is managed by central and site level procedures ( ). Specific controls over the manufacturing process are defined in the HACCP documents that define CCPs and CPs. This system was found to be working effectively and meets the requirements of the Global Standard for Food Safety and ISO 9001:2008. An electronic quality manual is in place and available to departmental managers. Documents for registrations are available (paper) at the departments.

3.2 Documentation control

Documents within are managed by the QA manager.
Based upon sampling the correct versions were in place.

3.3 Record completion and maintenance

Records are made during the production process. This partly electronic (I&R tracing) and manual (HACCP logs and planning documents.
All logs are verified before archiving.

3.4 Internal audit

There are schedules of internal audit against documented procedures, carried out by trained independent staff (VION sister company employees). There is a schedule for the internal audits according to procedure 'interne audits' (P-VION-10011).

Audit selected; 9 May 2017 (with focus on fundamentals BRC).

The results of the audits sampled (9 May 2017, 18_19 Ock 2016) comply with the requirements.
Deviations are reported, root cause and corrective actions defined, follow-up and verification is done.

On a daily basis each department carries out an pre-SSOP check before start of work and during the day.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food). Suppliers are well monitored and followed up. Supplier approval is based on risk assessment and analysis.

Suppliers are monitored on an on-going basis. The assessment is based on enquiries at each VION site involved. The site Tilburg demonstrated the reporting of their experiences.
This results into an approved report of VION suppliers.

Tilburg has its own Procedure purchasing of extra meat (bijkoop) P-TIL-NL-10105. Suppliers are formally approved and ensure they continue to meet their obligations to supply safe, legal and quality products.

3.5.2 Raw material and packaging acceptance and monitoring procedures

Cattle are inspected at arrival in close cooperation with the veterinarian (NVWA).Completed VKI documents for each individual animal are defined as crucial.
At CCP level beef (extra carcasses) are monitored. Application was demonstrated during this visit.
Incoming packaging materials are checked at the packing storage department.

3.5.3 Management of suppliers of services

Suppliers are monitored on an on-going basis. The assessment is based on enquiries at each VION site involved. The site Tilburg demonstrated the reporting of their experiences.
This results into an approved report of VION suppliers.
For transport companies a separate system is applied. The site Tilburg performs mini-audits on the transport companies at the site (reports summer 2016).
An overall VION report reflecting all transport companies for the year 2016 is under construction.

3.5.4 Management of outsourced processing and packing

No parts of the own process (scope) is outsourced.

The freezing and packing of beef by an external service provider is monitored based on audits and GFSI approval.

3.6 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished products are available.
Based upon sampling the availability of specifications was demonstrated.
Dutch beef cutting specifications. General specification for beef products (including microbiological criteria and statement on pathogens). Specific customer requirements (customer for and customer)

have been agreed.

3.7 Corrective and preventive actions

A central list of non-conforming situations is kept. Input is from audits, complaints and reported deviations. Deviations are reported, root cause and corrective actions defined, follow-up and verifications are reported.
The minor NC's from previous visit were discussed and the situations did not re-occur.

3.8 Control of non-conforming product

Corrective actions will be taken in case of a non-conforming product.

At the slaughter line the individual animal with defects is labelled. At the rework section corrections are made and formal release of the carcass is executed.

At the beef and by-product processing departments products are blocked with the help of red signs and specific areas for storage. Correct application was met.

3.9 Traceability

Traceability system covers raw materials through work in progress to finished product including packaging materials and distribution according to procedure identification and traceability (P-TIL-NL-10067). This system is fully based on electronic data and written documents, day batch codes and bar codes:

- Cows and bulls bear an earmark (+ accompanied by passport, track record and VKI)
- Beef carcasses / quarters get a serial number (together with date of slaughter + origin)
- Quarters (own production + additional purchase) get a batch code (date of production + origin)
- Finished product is traced depending on the date of production (SSCC-number per peace / crate / box is scanned at dispatch)
- Primary packaging materials are tracked based upon the date of starting a new batch.

Internal testing is done each year and extra testing related to customer initiated tests.
Report Recall en Tracing test in Feb 2017 was reported and complies (forward, backwards, mass balance, timing and team assembling).

During the audit a tracing test is initiated by the auditor.
Tracing of the packed beef (vacuum): Article 288, "runderhaas 2,4 kg+, lot
The beef products of this batch were traced forward towards the customers supplied and products still in stock. CCP records of the production day and dispatch of several days were collected. The CCP records of the day of slaughtering were made available. For two individual cows the in-coming inspection (VKI form) and related farm were sampled. The test was conducted within 4 hrs.

A minor NC is reported for an incomplete record for used foil.

3.10 Complaint handling

Complaints are received by the sales department (Tilburg). Any complaints which are considered to be attributable to the site are communicated and investigated.
The number of complaints is about 9,3%. This is calculated per order line.
Within this group the majority are commercial complaints (colour differences, not confirmed/ incomplete orders). XX complaints are related to foreign bodies (p hard plastic, q soft plastic and r metal). Due to a different way of reporting no direct comparing with 2016 is possible.
Overall, related to the amount of products a relatively low level food foreign object complaints is met.
Improvement is initiated by applying more metal detection for the cut beef products.

3.11 Management of incidents, product withdrawal and product recall

There is a VION crisis and recall management procedure (P-FOOD-10015) which covers the process which is applicable for all VION sites. This includes requirements for stock, logistics, recovery, storage and disposal as appropriate. Part of the recall procedure is tested by the site in Tilburg 1 x / year (Feb 2017). And the procedure is reviewed yearly by the head quarter.
No recalls since last BRC audit.

3.12 Customer focus and communication

Communication with the customers is done by the sales representative.
Results of the performances are received from the clients and the reports reveal compliance with the customer requirements.

Details of non-applicable clauses with justification

Clause reference	Justification

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. This location has been suitable maintained and well equipped.

External areas to production/ office buildings are maintained. A paved surface is applied around the building. No potentially risks assessed to product safety.

A minor NC is reported for an overgrown area next to the slaughter department.

4.2 Security

Site boundaries are well defined and 24 hour security is in place with badge control for employees on the single potential entry point to the plant. The site is fully fenced in and has camera surveillance. Separate storage takes place for cleaning chemicals and waste. The site is registered by The Food and Consumer

Product Safety Authority (official approval NL 87 EG).

4.3 Layout, product flow and segregation

A site plan is in place with personnel flows and material/ product flows. Equipments are placed such as to minimise the risk of product contamination.
Low risk open product areas are defined. The BRC7 appendix 2 has been applied.
A minor NC was reported for an not up-to-date site map.

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

The oldest part of the building is from 1920. In 2006 a new building for the cutting and packing departments has been constructed and in 2012 expansion of the storage department took place.

The fabric and internal condition of the site was suitable and satisfactory for the process. Walls, ceilings and floors were generally suitable. Floors constructed of granite are generally in good condition and maintained (repaired). False ceilings are used in manufacturing areas. They are totally closed. Glass windows are protected by foil. Suitable ventilation/ cooling provided into the factory.

A minor NC was reported for a window frame with defects.

4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored. The water used for cleaning and process is mains water. Water quality is defined as a general control measure. A water distribution plan is available. Quality of water is monitored in an adequate way (2 times a year).
The compressed air system is controlled by regular filter inspections and preventive renewal (each half year).

No gasses are applied.

A minor NC was reported for condense forming situation at a storage area.

4.6 Equipment

The used equipment is suitable for its purpose. Use of well-known brands of equipment for food applications.
A minor NC was reported for an electrical sawing device not in good repair.

4.7 Maintenance

Equipment is maintained and on the planned (preventive and corrective) maintenance system ( ).
Cooling equipment, calibration records are included. Maintenance department employs 7 service men.
Maintenance is also outsourced to established companies within the food and meat business.
Registrations to confirm that the preventive maintenance or preventive controls have been carried out as planned are in place.

The focus is on realising preventive maintenance.

The temperature of the cooled areas is monitored and alarms installed.

The temperature of the disinfection point for knifes (>82 degrees) is monitored and alarms installed

A formal release takes place after repair during production activities.

4.8 Staff facilities

Changing facilities are provided for company personnel, visitors and contractors to ensure correct work wear is worn prior to entry to any production areas. Staff facilities are designed and operated to minimise the risk of contamination. Staff facilities are suitable for the operation. Outdoor clothing and shoes are stored separately from work wear. Hand-washing facilities were provided in toilets and at entry points to production areas (with hand-free soap tap operation and single use paper towels or air blade). Before entering the production areas a sole washer is installed and an extra hand disinfecting system.

No high risk or high care production. Two rest rooms and catering facilities are provided for staff. Eating is allowed in the canteen; smoking is only allowed in a separated area of the canteen.

4.9 Chemical and physical product contamination control

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

The risk analysis reveals the potential risks. For the several departments good manufacturing practices are in place. The HACCP study has determined that metal detection is not necessary as CCP. The metal detectors are checked during production by the foreman.
A glass / hard plastic register are in place and record the location and condition of glass / hard plastic. Glass / hard plastic audits are regularly carried out by production department (daily pre-SSOP and SSOP + 1 x / 3 months –). No products are packed into glass.
Wooden pallets are not permitted in production, but used at the end of the packing line where there is no risk to open product (all products are fully packed).

4.9.1 Chemical control

Control over cleaning chemicals on site was demonstrated. Separate storage facility for cleaning chemicals with authorised access by cleaning company and production department. MSDS available and specifications confirm suitability for use in food processing industries from supplier and

4.9.2 Metal control

A knife handling policy is in place.

4.9.3 Glass, brittle plastic, ceramics and similar materials

All glass surfaces are foil protected.
At each start of the day a visual check is done for nonconforming situations for each department (pre-SSOP)

4.9.4 Products packed into glass or other brittle containers

Not applied.

4.9.5 Wood

Only fully packed products are stacked on wooden pallet. Wood is not allowed in open product departments.

A minor NC was reported for the presence of a wooden pallet at the intestines department.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Metal detection takes place after packing of beef. No all products can be metal detected due to size of packed volume. Procedures are in place in case the metal detector does not detect the test bullet (CP level). Metal hazard is controlled by metal checks in relation to the hazard analysis. Registration and corrective actions could be demonstrated.

4.10.2 Filters and sieves

Not applied

4.10.3 Metal detectors and X-ray equipment

Metal detection takes place after packing of beef. No all products can be metal detected due to size of packed volume. Procedures are in place in case the metal detector does not detect the test bullet (CP level). Metal hazard is controlled by metal checks in relation to the hazard analysis. Registration and corrective actions could be demonstrated.

No X-ray detection.

4.10.4 Magnets

Not applied.

4.10.5 Optical sorting equipment

Not applied.

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

Not applied.

4.11 Housekeeping and hygiene

Cleaning of equipment is carried out according to documented and detailed cleaning schedules. These detail the chemicals to use, precautions to take and method of cleaning. Cleaning is done by subcontractor in the evening / at night when production has stopped.

Some machines and areas are cleaned by own rained personnel (vacuum packing machines and intermediate storage areas for beef carcasses).

The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP) and hygiene programs. TVC swabs checks are planned and reported. Swabs for pathogenic bacteria like Listeria Monocytogenes can be initiated based upon specific situations. Records of checks are maintained and were sampled during the audit. Cleaning schedules of are available ('Reinigings- en

desinfectieschema' P-TIL-NL-10081) and cover equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) assessed also.

The follow up of cleaning is done by daily visual inspections (pre-SSOP), hygiene program by means of agar and microbiological analysis (P-NL-FOOD-10031) of end products to ensure the cleaning was effective.

Review of records assessed. Cleaning was being carried out as planned. Verification takes place.

A minor NC was reported for not cleaning test rods after usage.

4.11.7 Cleaning in place (CIP)

Blood collecting equipment is cleaned in place (CIP). CIP processing is under control by the customer in house ( ). Residue control after cleaning is conducted by VION Tilburg.

4.12 Waste / waste disposal

Waste containers are available throughout production areas and are emptied regularly to prevent an accumulation of waste. No trademarked materials applicable. Partly the waste is collected for animal feed. Legal requirements are met (e.g. separate storage and clear identification). Waste disposal is handled by licensed contractors:

(paper, plastic, e.g.), (category 1), (fat), (bones), (category 3, feed)

4.13 Management of surplus food and products for animal feed

Not applied.

4.14 Pest Control

Pest control iss contracted to (since April 2016).

Service contracts are available to specify the requirements and contractual obligations of the pest control contractor. The company has a contract about the pest control of Rodents, Cockroaches, Crawling insects and Flying insects.

The frequency of control is 8 x / year for Rodents, insects; maintenance of EFK is 4 x / year and an in-depth pest control survey will be conducted once a year. Next to this visit a quality inspection is done. This year new EIV's have been installed. These have a removable glue plate which facilitates counting.

All documentation and visit reports are available on the website.

Occurrence of infestation has been reported (incidents, no production are).

Trend wise no situations of concern.

4.15 Storage facilities

General handling procedure and temperature control is applicable during storage (CP). Cleaning and maintenance records can be shown. Documented procedures are in place to ensure product temperature requirements are met. Products are labelled. Stock rotation is FIFO.

4.16 Dispatch and transport

Transport is subcontracted. Temperature is monitored and logged. On a daily basis products are sent to the customers. VION Tilburg reviews the performance of these transport companies each year.
The content of the contract complies with the requirements. General handling procedure and temperature control (CCP) is applicable. Product is loaded via covered bays.

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5 / 4.4.4 / 4.8.4	No high-care area in line with appendix 2
4.3.6/ 4.4.4 / 4.4.13/ 4.8.5	No high-risk area in line with appendix 2
4.3.7	No ambient high-care area in line with appendix 2
4.9.3 / 4.9.4 / 4.10.6	No products packed into glass or brittle containers
4.10.2/ 4.10.4/ 4.10.5	No filters or magnets in product flow. No optical sorting equipment.

5. Product control

5.1 Product design/development

No real product design takes place at the site. No consumer end products are applicable.
At central level a development procedure is available.

Cuts are tested first in the production departments and samples are discussed with the customer before a new product is accepted. Factory trials are undertaken (no tests during this visit).

Shelf life monitoring has been done in line with the plan. Vacuum packed 6 weeks at. 2 C.

5.2 Product labelling

Product labels are applied at different levels.
Final packed products are labelled in line with the EU requirements for beef. The labels are printed just before sticking to the packaging revealing lot code, shelf life and weight.
By-products are clearly labelled with name and day of production.

5.3 Management of allergens

No allergens are used, only fresh meat under current scope. An assessment is carried out at possible risks of milk from the udders (slaughter department). Correct removal of udders was demonstrated. Precautions are taken concerning other sources of allergen contamination at the staff canteen (pull out jacket and washing hands).

5.4 Product authenticity, claims and chain of custody

Organic production (SKAL) is controlled by procedures and formal certification. Identity preservation is applied with the help of clear labelling and demonstrated during the visit.
The company undertakes several documented mass balances a year.
Procedure "Duurzame productie" P-TIL-NL-10055

Chain of Custody audits includes the evaluation of the risk assessment and vulnerability assessment. Part of the training concerns how to act in case of doubts.

5.5 Product packaging

All packaging and supplier approval is controlled from VION central office. The central system is a part of the multi-site ISO 9001 approval. Primary packaging materials are appropriate for the intended use and stored under conditions to minimise the risk of contamination and deterioration. Product packaging material is checked against visual standards of acceptability upon arrival at site. Packaging materials specifications reveal food safe declaration (EU-directives). E.g. foil for vacuum packing,

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Individual animals are inspected by a veterinarian (NVWA) during the arrival at the slaughter department.

does the formal carcass inspection and release. does the qualification of the carcasses.

All analyses (microbiological tests of products, GMP analyses – hygiene programs, water analyses) are based upon a sampling plan and in line with EU 2073. All microbiological analysis are subcontracted to accredited laboratory

A microbiological monitoring program and shelf life testing program is in place ('bemonsteringsplan VION Tilburg'). The frequency of monitoring depends on the risk:

Carcasses own production, carcasses additional purchase, technical cuts, technical parts , by-products: 1 x / week microbiological analysis of TPC, entero's, Salmonella (pool), E. coli and sometimes Listeria.

Extra parameters: 1 x / 3 months microbiological analysis of yeasts + moulds, Pseudomonas, Staphylococcus aureus.

5.6.2 Laboratory testing

Internal swab testing and results are done at the office of the QA manager. No laboratory.

5.7 Product release

Finished product is released unless it is in blockade. Those products are only released by competent personnel and after checking all relevant production data.
Beef intended for further raw processing and raw consumption is under a positive release regime (risk assessment and customer requirement).

Details of non-applicable clauses with justification

Clause reference	Justification
5.3.7	No allergen free claims.
5.6.2.2	No laboratory on-site

6. Process control

6.1 Control of operations

The site clearly demonstrated a control of operations. The process is suitable for this type of production. Process conditions and methods are well looked at and revalidated. Systematic monitoring is demonstrated. During production the correct application of CCP's is monitored and verified on a day to day basis. Assessed for CCP temperature control (delivery/receiving goods), faecal contamination of carcasses and removal of spinal cord.
Process control is based upon the HACCP study, legal and customer requirements. Documented starts up checks are applied (SSOP).
Maintenance of the cooled areas is demonstrated.

6.2 Labelling and pack control

Packing takes place in line with production planning and customer requirements. QC tests (product labelling, traceability code, shelf life, disclaimer, seal control) carried out in accordance with specifications.

6.3 Quantity, weight, volume and number control

All products are sold by weight. Metrology controls the balances for commercial purpose. No issues identified. Calibration of the scales is demonstrable.

6.4 Calibration and control of measuring and monitoring devices

The devices are tested on a daily or weekly basis (records). Procedure scale control P-TIL-NL-10115.
Weighing equipment (legal requirement) is calibrated once in three years (report March 2016).
Critical measuring equipment are thermometers (CCP related). An external yearly calibration is combined with a 2-monthly internal temperature test (0 and 100 C).
Based upon sampling this method is demonstrated.

Details of non-applicable clauses with justification

Clause reference	Justification

7. Personnel

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

There was evidence of introduction training for new starters, temporary workers and contractors. Clear refreshment competency training (on food safety, quality and food defense) had taken place for the staff in 2016/ 2017.
CCP's control was done in line with the documented requirements.
A competence matrix is in place with evidence that relevant personnel are trained in the slaughter department.
A draft training plan for 2017 was available.

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

The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to the personnel through brochure "Werken bij VION".

During this visit, in general, correct application of the hygiene rules were met.

7.3 Medical screening
The medical screening is part of the intake of new employees and part of the instructions/ questions to visitors at entrance. Persons who are suffering from a relevant infectious disease are not allowed to enter the production facilities. Medicine use is set at the hygiene rules.
7.4 Protective clothing: employees or visitors to production areas
Company issued protective clothing is given to all staff and visitors. Good adherence to the dress code observed during the site evaluation. The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to the personnel through brochure "Werken bij VION". These hygiene rules are effectively enforced. Records seen. Clean and dirty clothes are stored separately. Employees can change daily or more frequently when necessary. The clothes are externally cleaned by Berendsen. This is a low risk operation with visual inspection by the company. Personal protective devices are washed daily and monitored by the company. Gloves are coloured and changed frequently.

Details of non-applicable clauses with justification

Clause reference	Justification
7.4.4	No high- care or high-risk areas.

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

Module 12: AOECS Gluten-free Foods

Scope

12.1 Senior management

12.2 Management of suppliers of raw materials and packaging

12.3 Outsourced production

12.4 Specifications

12.5 Management of gluten cross-contamination

12.6 Management of incidents, product withdrawal and product recall

12.7 Labelling

12.8 Product inspection and laboratory testing