



Audit Report

Global Standard for Food Safety Issue 6: July 2011

1. Audit Summary			
Company name	VION Apeldoorn B.V.	BRC Site Code	1812048
Site name	VION Apeldoorn B.V.		
Scope of audit	The slaughtering of pigs and the deboning, cutting to specification and packing in bulk packaging of pork, including Good Farming®-meat.		
Exclusions from scope	The collection and processing of natural sausage casings and other slaughter by-products derived from gastrointestinal tract.		
Audit Finish Date	2014-01-23		

2. Results			
Audit result	Certificated	Audit grade	A
Audit type	Announced		
Audit frequency	12 months	Re-audit due date	2015-02-04
Previous audit grade	A	Previous audit date	2013-01-30

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

3. Company Details	
Address	Laan van Malkenschoten 77, 7302 HD Apeldoorn
Country	Netherlands
Telephone	
Commercial representative Name	Email



3. Company Details

Technical
representative
Name

Email

4. Company Profile

Plant size
(metres square)

8240

No. of
employees

No. of HACCP
plans

1

Subcontracted processes

No

Other certificates held

Organic (SKAL), ISO 9001, Welfare (= GB for
organised by IKB certification), QS and USDA,)

Regions exported to

Europe
Choose a region
Choose a region
Choose a region
Choose a region
Choose a region

Major changes since last
BRC audit

No real changed actual. The quality manager is changed (coming from
other Vion Plant). An extension of the building is planned for 2014)

Company Description

Vion Apeldoorn BV is a slaughterhouse and industrial butcher. The company is part of the Vion Food group (Vion Food Nederland). The company is slaughtering in general pigs / week (pigs / hour) on one line. The slaughtering and cutting departments are working in 1 shift. Three possible routings are distinguished into the cutting part: ham, middle and forehand. Also deboning activities of the pork leg take place, according to a so called "vario" process which is a typical logical sequence operation with repetitive labour activities in conjunction with a labour rotation system. The pork is packaged at semi-bulk level (no consumer packaged items). No additional purchase of pork meat is taking place. Transport is fully organised by VION central department. The sale and purchase is arranged centrally. Main customers are Vion sister companies as well as wholesale and retail. A part of the employees is working at a temporary base. All pigs are on an exclusive basis coming from Dutch farmers ('born and bred') and reared conform to the Good Farming principles; all of them are also reared regarding special Welfare (IKB) demands. Also pigs from Belgien are received (QS demands). The company has a approved system to comply with welfare demands. The company is certificated for ISO 9001 as part of a multi site ISO system and is certificated for the USA-demands too. Official approval EG-312-NL of the Food and Consumer Product Safety Authority. No other certification with LRQA combined. The products are packed in crates or cartons, big boxes or hanged on hooks or brackets and can be vacuum packed

5. Product Characteristics

Product categories

01 - Raw red meat
Category
Category
Category



5.Product Characteristics			
Finished product safety rationale		Fresh pork meat (bulk, carcasses and cut to specification: further processing required), chilled (max. 7 degree), short shelf life, no presence of preservatives, packed at semi bulk level or vacuum	
High care	No	High risk	No
Allergens handled on site		no	
Product claims made e.g. IP, organic		Organic, IKB/ Q+S	
Product recalls in last 12 Months		No	
Products in production at the time of the audit		Slaughtering of pigs and sows; pork meat: carcass, ham, selected middles, shoulders deboned, 'mager met', fat trimmings. Related products: liver, tongue meat, lung-meat	



6.Audit Duration Details			
On-site duration	16 man hours	Duration of production facility inspection	8 man hours
Reasons for deviation from typical or expected audit duration	no		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2014-01-22	9.00	17.15
2	2014-01-23	8.45	16.45

7.Key Personnel	
Auditor Number	Auditor Names and roles

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



Present at audit				
Slaughterline				
Dispatch Foreman	X	X	X	
department Foreman Cutting	X	X	X	



Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements			
No.	Requirement ref.	Details of non-conformity	Critical or Major?

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



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

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



Minor						
1	1.1.10	<p>Insufficient root cause of corrective action was done for previous minor NC at 6.1.6: Again was condense on (another) evaporators in the organs cellar noticed during the audit and this was not seen in SSOP (checklist used during the working day) or pre SSOP (checklist used before starting up). Same for also condense (or drops leftovers from cleaning water) on ceiling corridor / storage room next to organs cellars. On the second audit day the condense problem was solved due reparation by TD. TD has done a reparation and has planned to change the system to prevent reoccurrence. A similar minor NC was noticed during the audit of 2013. The Quality manager has given an order for</p>	<p>In the central passageway the drops leftovers from cleaning water is swabbed at once by the facility employee after observation.</p> <p>The QA manager has given the concerning inspector an re-instruction about the working method to inspect every point on the checklist.</p> <p>TD repaired the drainage of the evaporator and the way of ventilating.</p> <p>Closed, subject to review of full implementation during next audit.</p>	<p>Responsibility of the verification was delegated to the department managers. Realization of the verification was not done correct. All department managers will follow a refreshment course in week 08. The course will be reviewed yearly.</p>	<p>See attachment 'opleidingen Apeldoorn 2014'</p>	2014-02-07



Minor					
		reparation one day before the audit, but the reparation was not ready during the audit.			
2	3.8.1	Table for tiding up meat has to be covered with clean blue plastic, this was seen with used (with blood) plastic. (dept. expedition / line 12)	The plastic of the table for rework meat in the department of dispatch is changed at once. Re-instruction is given to the employees who rework the meat. Each time after rework change the plastic on the table. Fully closed	All department managers and reworkers will follow a refreshment course in week 07. The course will be reviewed yearly.	See attachment 'opbeidingen Apeldoorn 2014'
3	4.4.1	Some fibres of paint seen next to a door (at both sided) in the corridors/ storage next to the organ cellars. No risk for product contamination (it was just above floor level).	All coating removed from doorjamb (both sides). Fully closed	No department responsible for the central passageway. Slaughter department will be responsible. Registration on SSOP-check. Doorjamb (both sides) equip with RVS material	See attachment F-APD-NL-10.006 See photo
					2014-02-07
					2014-02-07



Minor					
4	4.4.5	Some damaged surfaces at shelves at the ceilings observed (with cracks) down under evaporators in the storage cellar of organs. (was already planned by TD to change them).	Shelves of the evaporator in the storage cellar of organs are changed for new one. Fully closed	TD has a plan for preventive maintenance of all evaporators in the company and will realize this in 2014.	See photo 2014-02-07
5	4.4.12	Condense from evaporators organs cellar and also condense (or drops leftovers from cleaning water) on ceiling corridor / storage room next to organs cellars. (see also 1.1.10 and 6.1.6). This repaired at the second day of the audit. (no major because the organ meat needs a fully heat process)	In the central passageway the drops leftovers from cleaning water is swabbed at once by the facility employee after observation. The QA manager has given the concerning inspector an re-instruction about the working method to inspect every point on the checklist. Closed, subject to review of full implementation during next audit.	Responsibility of the verification was delegated to the department managers. Realization of the verification was not done correct. All department managers will follow a refreshment course in week 08. The course will be reviewed yearly.	See attachment 'optelidingen Apeldoorn 2014' 2014-02-07
6	4.8.3	Used white clothes should	The QA manager has	The female employee	See attachment 'sheet introductie' 2014-02-07

Minor					
		be hung outside the changing rooms during breaks. There was observed that employees did hang them in the cupboards with own clothes.	given the concerning female employees a re-instruction to hang the white clothes during breaks on the hooks in the passageway. Closed, subject to review of full implementation during next audit.	said she didn't know where she had to hang her white clothes. In the introduction course we have attached a sheet how to manage with company clothes during breaks	training'
7	4.11.2	Procedure and working method about check on cleaning performance is not working according to VION procedure. The schedule (= registration form) of agar checks (monthly all items must be checked) is not used last weeks. Now a handwritten list is used. The department of storage organs (and metal detection of crates with tongues) is cleaned daily, but no agar / residue checks of this room	The QA manager has given the two concerning inspectors a new instruction about the working method about which schedule to use and how to use it. Frequency of residue is increased. Closed, subject to review of full implementation during next audit.	Verification was not done by the interim QA manager. New QA manager has started at 06 th January of 2014. Schedule of agar checks is changed completely and complete with the residue measuring and trend of the R&D. Agar checks of every department will be carry out monthly, residue checks of every department will be carry	See attachment FAPD-NL-10.030 2014-02-07



Minor					
		on a monthly base (although VION central procedure mentions: every department must be checked). Only from the metal detector in this room agar checks are seen about quarterly.		out two times a month with a minimum of 10 measurements.	
8	5.5.1.2	Dec. 2013 is Listeria found on meat and on equipment after cleaning in cutting department. A3 improvement project is started, but root cause is not found till now (11 possible root causes are mentioned and investigation is ongoing). (NVWA is informed due the CCMT project	At 2 February 2014 the belt of the bones is demount and cleaned. Swabs before and after cleaning are taken and will confirm us (yes or no) if this belt caused us the listeria on the meat. Closed, subject to review of full implementation during next audit.	Most likely root cause at this moment is the transport belt of the bones, because the cleaning of it cannot been carry out properly. During cleaning this belt probably contamination of listeria take place by the aerosol. Belt must be made demountable and suction out of the cutting department has to extend in time without cooling.	See attachment A3 listeria 2014-02-07
9	6.1.6	Condense on evaporators organs cellar not seen in SSOP/ Pre SSOP. Same issue is missing in SSOP /	In the central passageway the drops leftovers from cleaning water is swabbed at once	Responsibility of the verification was delegated to the department managers.	See attachment 'opleidingen Apetboom 2014' 2014-02-07



Minor				
	<p>Pre SSOP for condense (or drops leftovers from cleaning water) on ceiling corridor / storage room next to organs cellars. On the second audit day the condense problem was solved due reparation by TD. TD has done a reparation and has planned to change the system to prevent reoccurrence.</p>	<p>by the facility employee after observation.</p> <p>The QA manager has given the concerning inspector an re-instruction about the working method to inspect every point on the checklist.</p> <p>Closed, subject to review of full implementation during next audit.</p>	<p>Realization of the verification was not done correct.</p> <p>All department managers will follow a refreshment course in week 08. The course will be reviewed yearly.</p>	

Detailed Audit Report

1. Senior Management Commitment

1.1 Senior management commitment and continual improvement

The site has ISO9001:2008 approval in a multisite certification with all VION Food Nederland plants. The company demonstrated an effective system which is maintained and compliant with the process controls and is effective in meeting customer, process and product measures. A system for continual improvement and PDCA cycle was present. The yearly management review was reflecting the period June 2012 – July 2013. This review includes the HACCP verification. The corrective actions related to the previous visit have been evaluated and were closed effectively.

For setting the goals, a system called X matrix is in use. Examples were seen like the goal to extend the building, to improve the technical organisation (TD), to deliver just in time and to improve logistic process and also more efficiency is a goal. Other objectives: to deliver China and consumer portions (incl. Farming star labelling). Lean system is implemented. Clear communication structure is part of it (daily, weekly and monthly meetings).

Non-conformities (8 in total) identified at the previous audit against the Global Standard for Food Safety are mostly effectively actioned. One minor was reoccurred. A minor is written at paragraph 1.10.

Minor: Insufficient root cause of corrective action was done for previous minor NC at 6.1.6.

Requirement No	REQUIREMENT	Conforms
FUNDAMENTAL Statement of Intent	The company's senior management shall demonstrate they are fully committed to the implementation of the requirements of the <i>Global Standard for Food Safety</i> and to processes which facilitate continual improvement of food safety and quality management.	Y
1.1.1	The company shall have a documented policy which states the company's intention to meet its obligation to produce safe and legal products to the specified quality and its responsibility to its customers. This shall be:	Y

	<ul style="list-style-type: none"> signed by the person with overall responsibility for the site communicated to all staff. 	
1.1.2	<p>The company's senior management shall ensure that clear objectives are defined to maintain and improve the safety, legality and quality of products manufactured, in accordance with the quality policy and this Standard. These objectives shall be:</p> <ul style="list-style-type: none"> documented and include targets or clear measures of success clearly communicated to relevant staff monitored and results reported at least quarterly to site senior management. 	Y
1.1.3	<p>Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually as a minimum, to review the site performance against the Standard and objectives set in 1.1.2. The review process shall include the evaluation of:</p> <ul style="list-style-type: none"> previous management review action plans and time frames results of internal, second party and/or third party audits customer complaints and results of any customer performance reviews incidents, corrective actions, out of specification results and non-conforming materials review of the management of the HACCP system resource requirements. <p>Records of the meeting shall be documented and used to revise the objectives.</p> <p>The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed time scale</p>	Y
1.1.4	<p>The company shall have a demonstrable meeting programme which enables food safety, legality and quality issues to be brought to the attention of senior management at least monthly and allows for the resolution of issues requiring immediate action.</p>	Y
1.1.5	<p>The company's senior management shall provide the human</p>	Y



		and financial resources required to produce food safely in compliance with the requirements of this Standard and for the implementation of the HACCP-based food safety plan.	
1.1.6		The company's senior management shall have a system in place to ensure that the company is kept informed of scientific and technical developments, industry codes of practice and all relevant legislation applicable in the country of raw material supply, production and, where known, the country where the product will be sold.	Y
1.1.7		The company shall have a genuine, original hard copy or electronic version of the current Standard available.	Y
1.1.8		Where the company is certificated to the Standard it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.	Y
1.1.9		The most senior production or operations manager on site shall attend the opening and closing meetings of the audit for Global Standard for Food Safety certification. Relevant departmental managers or their deputies shall be available as required during the audit process.	Y
1.1.10		The company's senior management shall ensure that the root causes of non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.	N
1.2	Organisational structure, responsibilities and management authority		
The organisational structure is clear and part of the QMS. The management structure is documented as a tree. The departmental managers directly report to the plant manager. The responsibilities, authorities and reporting relationships of all staff members are described in the job descriptions. Performance of personnel is monitored day to day with a formal review during the appraisal system. At some places new managers were in place (QA manager and manager slaughter).			
Statement of Intent		The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality.	Y
1.2.1		The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, legality and quality shall be clearly allocated and understood by	Y



	the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	
1.2.2	The company's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instruction.	Y

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



The company's food safety control system is based on the Codex Alimentarius HACCP principles. The HACCP system is implemented and maintained. At VION Food NL level a thorough HACCP analysis (P-VION-10000) is made and available for the sites. The local HACCP system (P-APD-NL-10022 from 28-01-2013) was developed by a multi-disciplinary team. The HACCP system has full management commitment and is an integral part of the company's Quality Management System (QMS). The HACCP was found to be well documented and effective. Prerequisite program (with 36 CP's and 3 RP's) assessed. Full product description including microbiological limits and shelf life is in place. The intended use of the product by the customer has been clearly defined. Flow diagrams are prepared and available on Quality on-line. The HACCP plan included a review of potential physical, chemical and microbiological hazards. Each identified hazard was reviewed and given a risk rating to define the severity (1 – 3) and likeliness (1 – 3) of a hazard occurring. The risks ($R \geq 3$) have been defined from the hazards with adoption of a decision tree: Risk < 3 = PRP, Risk 3 or 4 = CP, Risk 6 or 9 = CCP. The company has defined 4 Critical Control Points (CCP's) relating to product safety and the scope of the BRC audit:

- CCP 1. Faecal contamination of carcasses;
- CCP 2. Temperature control of animal by-products at dispatch + temperature control of (returned) animal by-products at reception;
- CCP 3. Temperature control of fresh / vacuum packed pork meat at dispatch + temperature control of (returned) fresh pork meat at reception;
- CCP 4. Temperature control of partially chilled pork meat at dispatch.

Critical limits have been defined for each CCP and are related to the legal temperature requirements for meat and corporate engagements:

- CCP 1. Zero tolerance for macroscopic visible faecal contamination (hourly, in line measurements)
- CCP 2 – 4. Core temperature of fresh pork meat <7°C, of animal by-products <3°C and of partially chilled pork meat (legs) at dispatch: <33,5°C (sampling for each truck). Surface temperature measurement by means of contact (vacuum packed products): <6°C.

CCP monitoring has been defined and documented. Each employee checked, was trained. Records of CCP monitoring and verification show measurements are carried out by authorised persons as planned. The procedures for each CCP identify the corrective action to be taken when the limits are exceeded. Records are kept of adjustments made and any actions taken.

The HACCP system is verified through the internal audit process, the management review from 12 Sept 2013, the periodical reports, and the yearly HACCP-reassessment (from August 2013).

2.1	The HACCP food safety team – Codex Alimentarius Step 1	
2.1.1	<p>The HACCP plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality/technical, production operations, engineering and other relevant functions.</p> <p>The team leader shall have an in-depth knowledge of HACCP and be able to demonstrate competence and experience.</p> <p>The team members shall have specific knowledge of HACCP and relevant knowledge of product, process and associated hazards.</p> <p style="text-align: right;">In the event of the company not having appropriate in-house knowledge, external expertise may be used, but day-to-day management of the food</p>	Y



	safety system shall remain the responsibility of the company.	
2.2	Prerequisite programmes	
2.2.1	<p>The company shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> • cleaning and sanitising • pest control • maintenance programmes for equipment and buildings • personal hygiene requirements • staff training • purchasing • transportation arrangements • processes to prevent cross-contamination • allergen controls. <p>The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and shall be included within the development and reviews of the HACCP</p>	Y
2.3	Describe the product – Codex Alimentarius Step 2	
2.3.1	<p>The scope of each HACCP plan, including the products and processes covered, shall be defined. For each product or group of products a full description shall be developed, which includes all relevant information on food safety. As a guide, this may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> • composition, e.g. raw materials, ingredients, allergens, recipe • origin of ingredients • physical or chemical properties that impact food safety, e.g. pH, aw • treatment and processing, e.g. cooking, cooling • packaging system, e.g. modified atmosphere, vacuum • storage and distribution conditions, e.g. chilled, ambient • target safe shelf life under prescribed storage and usage conditions • instructions for use, and potential for known customer misuse, e.g. storage, preparation. 	Y

2.3.2	<p>All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company will ensure that the HACCP plan is based on this may include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> the latest scientific literature historical and known hazards associated with specific food products relevant codes of practice recognised guidelines food safety legislation relevant for the production and sale of products customer requirements 	Y
2.4	Identify intended use – Codex Alimentarius Step 3	
2.4.1	<p>The intended use of the product by the customer shall be described, defining the consumer target groups, including the suitability of the product for vulnerable groups of the population (e.g. infants, elderly, allergy sufferers).</p>	Y
2.5	Construct a process flow diagram – Codex Alimentarius Step 4	
2.5.1	<p>A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP scope, from raw material receipt through to processing, storage and distribution. As a guide, this should include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> plan of premises and equipment layout raw materials including introduction of utilities and other contact materials, e.g. water, packaging sequence and interaction of all process steps outsourced processes and subcontracted work process parameters potential for process delay rework and recycling low/high-care/high-risk area segregation finished products, intermediate/semi-processed products, by-products and waste. 	Y
2.6	Verify flow diagram – Codex Alimentarius Step 5	
2.6.1	<p>The HACCP food safety team shall verify the accuracy of the</p>	Y



	flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations shall be considered and evaluated. Records of verified flow diagrams shall be maintained.	
2.7	List all potential hazards associated with each process step, conduct a hazard analysis and consider any measures to control identified hazards – Codex Alimentarius Step 6, Principle 1	
2.7.1	The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and allergen risks (refer to clause 5.2). It shall also take account of the preceding and following steps in the process chain.	Y
2.7.2	<p>The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following:</p> <ul style="list-style-type: none"> • likely occurrence of hazard • severity of the effects on consumer safety • vulnerability of those exposed • survival and multiplication of micro-organisms of specific concern to the product • presence or production of toxins, chemicals or foreign bodies • contamination of raw materials, intermediate/semi-processed product, or finished product. <p>Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.</p>	Y
2.7.3	The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programmes, this shall be stated and the adequacy of the programme to control the hazard validated. Consideration may be given to using more than one control measure.	Y
2.8	Determine the critical control points (CCP) – Codex Alimentarius Step 7, Principle 2	
2.8.1	For each hazard that requires control, control points shall be	Y

	<p>reviewed to identify those that are critical. This requires a logical approach and may be facilitated by use of a decision tree. CCPs shall be those control points which are required in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level. If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process shall be modified at that step, or at an earlier or later step, to provide a control measure.</p>	
2.9	Establish critical limits for each CCP – Codex Alimentarius Step 8, Principle 3	
2.9.1	<p>For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control. Critical limits shall be:</p> <ul style="list-style-type: none"> measurable wherever possible, e.g. time, temperature, pH supported by clear guidance or examples where measures are subjective, e.g. photographs 	Y
2.9.2	<p>The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level.</p>	Y
2.10	Establish a monitoring system for each CCP – Codex Alimentarius Step 9, Principle 4	
2.10.1	<p>A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and wherever possible provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> online measurement offline measurement continuous measurement, e.g. thermographs, pH meters etc. where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product. 	Y
2.10.2	Records associated with the monitoring of each CCP shall	Y

	include the date, time and result of measurement and shall be signed by the person responsible for the monitoring and verified, as appropriate, by an authorised person. Where records are in electronic form there shall be evidence that records have been checked and verified.	
2.11	Establish a corrective action plan – Codex Alimentarius Step 10, Principle 5	
2.11.1	The HACCP food safety team shall specify and document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend towards loss of control. This shall include the action to be taken by nominated personnel with regard to any products that have been manufactured during the period when the process was out of control.	Y
2.12	Establish verification procedures – Codex Alimentarius Step 11, Principle 6	
2.12.1	<p>Procedures of verification shall be established to confirm that the HACCP plan, including controls managed by prerequisite programmes, are effective. Examples of verification activities include:</p> <ul style="list-style-type: none"> • internal audits • review of records where acceptable limits have been exceeded • review of complaints by enforcement authorities or customers • review of incidents of product withdrawal or recall. <p>Results of verification shall be recorded and communicated to the HACCP food safety team.</p>	Y
2.13	HACCP documentation and record keeping – Codex Alimentarius Step 12, Principle 7	
2.13.1	Documentation and record keeping shall be sufficient to enable the company to verify that the HACCP controls, including controls managed by prerequisite programmes, are in place and maintained.	Y
2.14	Review the HACCP plan	
2.14.1	The HACCP food safety team shall review the HACCP plan and prerequisite programmes at least annually and prior to any changes which may affect product safety. As a guide, these may include the following, although this is not an exhaustive list:	Y



	<ul style="list-style-type: none"> • change in raw materials or supplier of raw materials • change in ingredients/recipe • change in processing conditions or equipment • change in packaging, storage or distribution conditions • change in consumer use • emergence of a new risk, for example adulteration of an ingredient • developments in scientific information associated with ingredients, process or product. <p>Appropriate changes resulting from the review shall be incorporated into the HACCP plan and/or prerequisite programmes, fully documented and validation recorded.</p>	
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3. Food safety and quality management system

3.1 Food safety and quality manual

The company has a quality manual, complying with ISO 9001 and BRC 6, which states the company's commitment to quality and food safety. The quality manual is the total of all quality documents, going from the policy, over system procedures, working procedures, work instructions, registration documents. An electronic quality manual named ' ' or ' ' is in place and available to departmental managers. No restrictions for use with valid password.

A document control procedure controls the issue of documents to ensure they are at the correct issue status at points of use or reference. It also includes how obsolete documentation is handled. Documents checked all had issue date, reference and authorisation.

Statement of Intent	The company's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe product.	Y
3.1.1	The company's documented procedures, working methods and practices shall be collated in the form of a printed or electronic quality manual.	Y
3.1.2	The food safety and quality manual shall be fully implemented and the manual or relevant components shall be readily available to key staff.	Y



3.1.3	All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (e.g. there are issues of literacy or foreign language).	Y
3.2	Documentation control	
A general procedure is in place for document control. The QA manager is coordinating the authorisation steps in		
Statement of Intent	The company shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use.	Y
3.2.1	<p>The company shall have a procedure to manage documents which form part of the food safety and quality system. This shall include:</p> <ul style="list-style-type: none">• a list of all controlled documents indicating the latest version number• the method for the identification and authorisation of controlled documents• a record of the reason for any changes or amendments to documents• the system for the replacement of existing documents when these are updated.	Y
3.3	Record completion and maintenance	
Most records are hand written. All documents are kept for 2 – 7 years. Longest shelf-life is 18 months. All electronic data are secured by daily back-ups.		
Statement of Intent	The company shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.	Y
3.3.1	Records shall be legible, retained in good condition and retrievable. Any alterations to records shall be authorised and justification for alteration shall be recorded. Where records are in electronic form these shall be suitably backed up to prevent loss.	Y
3.3.2	Records shall be retained for a defined period with consideration given to any legal or customer requirements and to the shelf life of the product. This shall take into account, where it is specified on the label, the possibility that shelf life may be extended by the consumer (e.g. by freezing). As a minimum, records shall be	Y

	retained for the shelf life of the product plus 12 months.	
3.4	Internal audit	
	<p>There are detailed schedules of internal audit against documented procedures, carried out by trained independent staff (VION sister company employees). All departments are included in the plan. The audit frequencies are based on the risk of the activity to the business, the operation and the customers. Twice a year the production sites and involved departments are audited. The audits have been carried out close to schedule and corrective action has been taken in a timely manner. Internal audits performed on 05-07-2013 and 10/1/2014. Report of internal audits (by . and . are reviewed during the site evaluation. Non conformities are clearly listed with their corrective actions. Action points assessed in action list. Non-conformities are reported to the management team and reviewed. In addition, hygiene audits and site / building inspections (pre-SSOP + SSOP) are performed daily and glass audits at quarterly / monthly intervals. Internal auditors are trained (internal by Vion, certificates are seen).</p>	
FUNDAMENTAL Statement of Intent	The company shall be able to demonstrate it verifies the effective application of the food safety plan and the implementation of the requirements of the Global Standard for Food Safety.	Y
3.4.1	There shall be a planned programme of internal audits with a scope which covers the implementation of the HACCP programme, prerequisite programmes and procedures implemented to achieve this Standard. The scope and frequency of the audits shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least annually.	Y
3.4.2	Internal audits shall be carried out by appropriately trained competent auditors, who are independent from the audited department.	Y
3.4.3	The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and the results shall be reported to the personnel responsible for the activity audited. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified.	Y



3.4.4	<p>In addition to the internal audit programme there shall be a programme of documented inspections to ensure that the factory environment and processing equipment is maintained in a suitable condition for food production. These inspections shall include:</p> <ul style="list-style-type: none">• hygiene inspections to assess cleaning and housekeeping performance• fabrication inspections to identify risks to the product from the building or equipment <p>The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas.</p>	Y
3.5	Supplier and raw material approval and performance monitoring	
3.5.1	Management of suppliers of raw materials and packaging	
<p>The delivery of pigs is organised by VION Farming, a central organisation of VION. Close communication was demonstrated.</p> <p>Purchasing and supplier approval is at VION Food Nederland. All suppliers of packaging have to be approved by the central VION office entered into the system () before they can be used. Relevant data were available upon request.</p> <p>Checked for the pigs delivered at 2/1/2014 (vertical audit).</p> <p>Services checked: cleaning company, supplier of packaging material, transporters and clothing washing.</p>		
Statement of Intent	<p>The company shall have an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including packaging) to the safety, legality and quality of the final product are understood and managed.</p>	Y
3.5.1.1	<p>The company shall undertake a documented risk assessment of each raw material or group of raw materials to identify potential risks to product safety, legality and quality. This shall take into account the potential for:</p> <ul style="list-style-type: none">• allergen contamination• foreign body risks• microbiological contamination• chemical contamination. <p>Consideration shall also be given to the significance of a raw material to the quality of the final product.</p> <p>The risk assessment shall form the basis for the raw material</p>	Y

	acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.	
3.5.1.2	<p>The company shall have a documented supplier approval and ongoing monitoring procedure to ensure that suppliers are manufacturing products under hygienic conditions, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval and monitoring procedure shall be based on one or a combination of:</p> <ul style="list-style-type: none"> • supplier audits • third party audits or certification, e.g. to BRC Global Standards • supplier questionnaires. <p>Where approval is based on questionnaires, these shall be reissued at least every three years and suppliers required to notify the site of any significant changes in the interim.</p>	Y
3.5.1.3	The procedures shall define how exceptions are handled (e.g. where raw material suppliers are prescribed by a customer or where products are purchased from agents and direct audit or monitoring has not been undertaken).	N/A
3.5.2	Raw material and packaging acceptance and monitoring procedures	
Statement of Intent	Controls on the acceptance of raw materials shall ensure that raw materials do not compromise the safety, legality or quality of products.	Y
3.5.2.1	<p>The company shall have a documented procedure for the acceptance of raw materials and packaging on receipt based upon the risk assessment (3.5.1). Raw material acceptance and its release for use shall be based on one or a combination of:</p> <ul style="list-style-type: none"> • visual inspection on receipt • certificates of conformance – specific to each consignment • certificates of analysis • product sampling and testing. <p>A list of raw materials and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined.</p>	Y



3.5.2.2		The procedures shall be fully implemented and records maintained to demonstrate the basis for acceptance of each batch of raw materials.	Y
3.5.3		Management of suppliers of services	
Statement of Intent		The company shall be able to demonstrate that where services are outsourced, the service is appropriate and any risks presented to food safety have been evaluated to ensure effective controls are in place.	Y
3.5.3.1		<p>There shall be a documented procedure for the approval and monitoring of suppliers of services. Such services shall include as appropriate:</p> <ul style="list-style-type: none">• pest control• laundry services• contracted cleaning• contracted servicing and maintenance of equipment• transport and distribution• off-site storage of ingredients, packaging or products• laboratory testing• catering services▪ waste management.	Y
3.5.3.2		Contracts or formal agreements shall exist with the suppliers of services which clearly define service expectations and ensure potential food safety risks associated with the service have been addressed.	Y
3.5.4		Management of outsourced processing	
No primary product processes are outsourced.			
Statement of Intent		Where any intermediate process steps in the manufacture of a product which is included within the scope of certification is subcontracted to a third party or undertaken at another company site, this shall be managed to ensure this does not compromise the safety, legality or quality of the product.	N.A.
3.5.4.1		The company shall be able to demonstrate that where part of the production process is outsourced and undertaken off site, this has been declared to the brand owner and, where required, approval granted.	N.A.



3.5.4.2	The company shall ensure that subcontractors are approved and monitored by successful completion of either a documented site audit or third-party certification to the BRC Global Standard for Food Safety or other GFSI-recognised Standard (see Glossary).	N.A.
3.5.4.3	Any outsourced processing operations shall: <ul style="list-style-type: none">• be undertaken in accordance with established contracts which clearly define any processing requirements and product specification• maintain product traceability.	N.A.
3.5.4.4	The company shall establish inspection and test procedures for outsourced product on return, including visual, chemical and/or microbiological testing, dependent on risk assessment.	N.A.
3.6	Specifications	
<p>Specifications for raw materials, packaging materials, cleaning agents and finished product are defined and managed by the involved departments. Based upon sampling during this audit the specifications were readily available.</p> <p>Checked as part of the vertical audit for the finished product Tongues, Collars and trimmings specifications + the packaging required (foil from), microbiological specifications.</p> <p>Specifications are reviewed to ensure they are correct and up to date. Specifications are available for relevant staff (MT).</p>		
Statement of Intent	Specifications shall exist for raw materials including packaging, finished products and any product or service which could affect the integrity of the finished product.	Y
3.6.1	Specifications for raw materials and packaging shall be adequate and accurate and ensure compliance with relevant safety and legislative requirements. The specifications shall include defined limits for relevant attributes of the material which may affect the quality or safety of the final products (e.g. chemical, microbiological or physical standards).	Y
3.6.2	Manufacturing instructions and process specifications shall comply with recipes and quality criteria as detailed in agreed customer specifications.	Y
3.6.3	Specifications shall be available for all finished products. These shall either be in the agreed format of the customer or, in the	Y

	case of branded products, include key data to meet legal requirements and assist the customer in the safe usage of the product.	
3.6.4	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that it has taken steps to ensure formal agreement is in place.	Y
3.6.5	Specifications shall be reviewed whenever products change (e.g. ingredients, processing method) or at least every three years. The date of review and the approval of any changes shall be recorded.	Y
3.7	Corrective action Corrective actions will be taken in case of a non-conformity. This can be initialized from several sources: (internal) audits, complaints, analyses, product controls, and hygienic controls. Corrective action was seen to take place generally in a timely manner (see minor at 1.10). CCP-checklists, CP-checklists, pre-SSOP-lists, SSOP-lists and incident reports assessed. Procedure P-VION-10005 refers to root cause analysis. A method for in depth root cause analysis through A3 is seen for the Listeria problem in the cutting department. The company has the improvement working method implemented on shop floor level till management level. Records are reviewed and actions initiated to prevent recurrence. Checks upon correct application and recording of corrective and preventive actions performed by QA.	
FUNDAMENTAL Statement of Intent	The company shall be able to demonstrate that they use the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence.	Y
3.7.1	The company shall have a documented procedure for handling non-conformances identified within the scope of this Standard to include: <ul style="list-style-type: none"> • clear documentation of the non-conformity • assessment of consequences by a suitably competent and authorised person • identification of the corrective action to address the immediate issue • identification of an appropriate timescale for correction • identification of personnel with appropriate authority responsible for corrective action • verification that the corrective action has been implemented and is effective 	Y

	<ul style="list-style-type: none"> identification of the root cause of the non-conformity and implementation of any necessary corrective action. 	
3.8	Control of non-conforming product	
<p>Non-conforming products / products on hold are physically identified as such. There is a clear documented procedure for the identification and disposal of non-conforming product. Direct action towards non-conforming products was demonstrated during the audit.</p> <p>Minor : Table for tiding up meat has to be covered with clean blue plastic, this was seen with used (with blood) plastic. (dept. expedition / line 12)</p>		
Statement of Intent	The company shall ensure that any out-of-specification product is effectively managed to prevent release.	Y
3.8.1	<p>There shall be documented procedures for managing non-conforming products which include:</p> <ul style="list-style-type: none"> the requirement for staff to identify and report potentially non-conforming product clear identification of non-conforming product, e.g. direct labelling or the use of IT systems secure storage to prevent accidental release, e.g. isolation areas referral to the brand owner where required defined responsibilities for decision making on the use or disposal of products appropriate to the issue, e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession records of the decision on the use or disposal of the product records of destruction where product is destroyed for food safety reasons. 	N
3.9	Traceability	
<p>Traceability system is developed. It covers raw materials through work in progress to finished product including packaging materials and distribution. This system is fully based on written documents, batch codes and bar codes according to 'procedure identificatie':</p> <ul style="list-style-type: none"> Pigs bear an earmark (+ accompanied by track record and VKI) Half carcasses get an EG-mark + serial number (together with date of slaughter + livestock status / origin) Technical parts get a batch code (EG-mark + date of production + origin) By-products get a batch code (date of slaughter / production) Primary packaging materials are traced on the date of receipt / breaking into new 		

batches

- Returned product (destination form).

No consumer packed end products are applicable.

Traceability test performed on 13-01-2014 combined with a recall test and traceability test also from August 2013. Mass balance / quantity check included. During the audit a vertical audit, incl. traceability test was checked of tongue (Welfare (+IKB)) , collars (QS and (Welfare (+IKB))) and trimmings (QS) from production date 3/1/2014; date of slaughter: 2/1/2014). Traceability exercise on site was completed within 1 hour. Traced: customers of finished products, load documents (farmers' and), packaging material, non-conforming products that day, and all records from production incl. start-up checks (pre ssop) and checks during production (SSOP and records of CCP's). Traceability was found adequate.

FUNDAMENTAL Statement of Intent	The company shall be able to trace all raw material product lots (including packaging) from their supplier through all stages of processing and despatch to their customer and vice versa.	Y
3.9.1	Identification of raw materials, including primary and any other relevant packaging and processing aids, intermediate/semi-processed products, part used materials, finished products and materials pending investigation shall be adequate to ensure traceability.	Y
3.9.2	The company shall test the traceability system across the range of product groups to ensure traceability can be determined from raw material to finished product and vice versa, including quantity check/mass balance. This shall occur at a predetermined frequency and results shall be retained for inspection. The test shall take place at least annually. Full traceability should be achievable within four hours.	Y
3.9.3	Where rework or any reworking operation is performed, traceability shall be maintained.	N/A
3.10	Complaint handling	

Complaints are received by Sales at central office (Boxtel) or by the international market office. Any complaints which are considered to be attributable to the site are communicated through complaint box and investigated. All complaints are trended, weekly reviewed by the site management team (tear 1 meting) based upon database and monthly reported. The procedure for complaint handling defines types of complaints (code 1 – 6) and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action (corrective

/ preventive) as appropriate. The reduction of complaint costs is a topical subject. Appropriate actions to clients, internal organisation and / or suppliers are demonstrable. Food safety related complaints, e.g. foreign bodies (small metal pieces in tongues (a metal detector is placed there), blue plastic, lubricant) get extra focus from the organisation. Yearly a training is given to employees about this subject. No complaints from the authorities. There have been no withdrawals or recalls because of complaints. Complaint overview 2013 seen. Amount of complaints about foreign bodies is lower than 2012. Main indicator: amount of complaints per 100 tons, indicator is on average now

Statement of Intent	Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.	Y
3.10.1	All complaints shall be recorded, investigated and the results of the investigation and root cause of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	Y
3.10.2	Complaint data shall be analysed for significant trends and used to implement on-going improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.	Y
3.11	Management of incidents, product withdrawal and product recall	
There is a company's crisis and recall management procedure which covers the process which is applicable for all VION sites. The procedure for non conforming product defines 'incidents' and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action as appropriate. Business continuity guaranteed by central procedures and emergency coordination protocol. The recall procedure is tested 1x / year. Recall test about performed on 13-01-2014 combined with a traceability test.		
Statement of Intent	The company shall have a plan and system in place to effectively manage incidents and enable the effective withdrawal and recall of products should this be required.	Y
3.11.1	The company shall have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain business continuity. Incidents may include:	Y



	<ul style="list-style-type: none"> • disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications • events such as fire, flood or natural disaster • malicious contamination or sabotage. <p>Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products.</p>	
3.11.2	<p>The company shall have a documented product withdrawal and recall procedure. This shall include as a minimum:</p> <ul style="list-style-type: none"> • identification of key personnel constituting the recall management team, with clearly identified responsibilities • guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained • an up-to-date list of key contacts or reference to the location of such a list, e.g. recall management team, emergency services, suppliers, customers, Certification Body, regulatory authority • a communication plan including the provision of information to customers, consumers and regulatory authorities in a timely manner • details of external agencies providing advice and support as necessary, e.g. specialist laboratories, regulatory authority and legal expertise • a plan to handle the logistics of product traceability, recovery or disposal of affected product and stock reconciliation. <p>The procedure shall be capable of being operated at any time.</p>	Y
3.11.3	<p>The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.</p>	Y
3.11.4	<p>In the event of a product recall, the Certification Body issuing the current certificate for the site against this Standard shall be informed within three working days of the decision to issue a recall.</p>	Y

4. Site Standards		
4.1 External standards		
<p>The site has been designed and constructed for its activities at an industrial area. There has been done an evaluation of the activities in the neighbourhood. There are no local activities which could be potentially a risk to product safety. The grounds were maintained in a satisfactory condition. Building maintenance is sufficient.</p>		
Statement of Intent	The production site shall be of suitable size, location, construction and design to reduce the risk of contamination and facilitate the production of safe and legal finished products.	Y
4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on finished product integrity, and measures shall be taken to prevent contamination. Where measures have been put into place to protect the site (from potential contaminants, flooding etc.), they shall be reviewed in response to any changes.	Y
4.1.2	The external areas shall be maintained in good order. Where buildings are surrounded by grassed or planted areas, they shall be regularly tended and well-maintained. External traffic routes under site control shall be suitably surfaced and maintained in good repair to avoid contamination of the product.	Y
4.1.3	The building fabric shall be maintained to minimise potential for product contamination (e.g. elimination of bird roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants).	Y
4.2 Security		
<p>Site boundaries are well defined and 24 hour security (by own gatekeeper) in place with badge control for employees on all potential entry points to the plant. Staff has been trained in site security procedures. For entrance to buildings visitors need to register. The site is registered by the Food and Consumer Product Safety Authority (official approval EG 312 NL).</p>		
Statement of Intent	Security systems shall ensure that products are protected from theft or malicious contamination whilst under the control of the site.	Y
4.2.1	The company shall undertake a documented assessment of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. Areas	Y

	shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled. Identified security arrangements shall be implemented and reviewed at least annually.	
4.2.2	Measures shall be in place to ensure only authorised personnel have access to production and storage areas and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.	Y
4.2.3	Where required by legislation, the site shall be registered with, or be approved by, the appropriate authority.	Y
4.3	Layout, Product Flow and Segregation	
The processing and packaging parts of the production are designed to prevent contamination risk. Based upon a risk assessment all zones are "low risk areas". Site plan assessed. Premises are almost suitable for the intended purpose. Process flow is straightforward and agreed with the Food and Consumer Product Safety Authority. Systems of W-flow were designed to minimise the risks of contamination.		
FUNDAMENTAL Statement of Intent	The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with relevant legislation.	Y
4.3.1	<p>There shall be a plan of the site which designates areas where product is at different levels of risk from contamination; that is:</p> <ul style="list-style-type: none">enclosed product areaslow-risk areashigh-care areashigh-risk areas. <p>See Appendix 2 for guidance.</p> <p>This shall be taken into account when determining the prerequisite programmes for the particular areas of the site.</p>	Y
4.3.2	<p>The site plan shall define:</p> <ul style="list-style-type: none">access points for personnel and travel routeslocation of staff facilities and routes to the facilities from places of work	Y

	<ul style="list-style-type: none"> production process flow routes for the removal of waste routes for the movement of rework. <p>If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials. All facilities shall be designed and positioned, where possible, so that movement of personnel is by simple, logical routes. The movement of waste and rework shall not compromise the safety of products.</p>	
4.3.3	Contractors and visitors, including drivers, shall be made aware of all procedures for access to premises and the requirements of the areas they are visiting, with special reference to hazards and potential product contamination. Contractors involved in maintenance or repair activities shall be under the supervision of a nominated person.	Y
4.3.4	In low-risk areas the process flow together with the use of demonstrably effective procedures shall be in place to minimise the risk of the contamination of raw materials, intermediate/semi-processed products, packaging and finished products.	Y
4.3.5	Where high-care areas are part of the manufacturing site there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality and utilities provision. Where physical barriers are not in place, the site shall have undertaken a full evaluation of the risks of cross-contamination and alternative effective processes shall be in place to protect products from contamination.	N/A
4.3.6	Where high-risk areas are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality and utilities provision. The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimise risk of product contamination (e.g. the disinfection of materials on entry).	N/A
4.3.7	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under	Y



	safe hygienic conditions.	
4.3.8	Temporary structures constructed during building work or refurbishment, etc. shall be designed and located to avoid pest harbourage and ensure the safety and quality of products.	N/A
4.4	Building fabric Raw material handling, preparation, processing, packing and storage areas	
<p>The fabric and internal condition of the site was suitable and satisfactory for the process. Walls, ceilings and floors were generally suitable.</p> <p>The fabric and internal condition of the site was suitable and satisfactory for the processes. Walls, ceilings and floors were generally suitable. A separate building is in use for storage of packaging materials. Only sailed materials are moved, to prevent for cross contamination. All areas are "low risk areas".</p> <p>Minor: Some fibres of paint seen next to a door (at both sided) in the corridors/ storage next to the organ cellars. No risk for product contamination (it was just above floor level).</p> <p>Minor: Condense from evaporators organs cellar and also condense (or drops leftovers from cleaning water) on ceiling corridor / storage room next to organs cellars. (see also 1.1.10 and 6.1.6). This repaired at the second day of the audit.</p> <p>Minor: Some damaged surfaces at shelves at the ceilings observed (with cracks) down under evaporators in the storage cellar of organs. (was already planned by TD to change them).</p>		
Statement of Intent	The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.	Y
4.4.1	Walls shall be constructed, finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	N
4.4.2	Floors shall be suitably hard wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious and maintained in good repair.	Y
4.4.3	Drainage , where provided, shall be sited, designed and maintained to minimise risk of product contamination and not compromise product safety. Machinery and piping shall be arranged so that, wherever feasible, process waste water goes directly to drain. Where significant amounts of water are used, or	Y

	direct piping to drain is not feasible, floors shall have adequate falls to cope with the flow of any water or effluent towards suitable drainage.	
4.4.4	Where sites include high-care or high-risk facilities, there shall be a plan of the drains for these areas which shows the direction of flow and location of any equipment fitted to prevent the back up of waste water. The flow of drains shall not present a risk of contamination of the high-care/risk area.	N/A
4.4.5	Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination.	N
4.4.6	Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed.	Y
4.4.7	Where there is a risk to product, windows , and roof glazing which is designed to be opened for ventilation purposes, shall be adequately screened to prevent the ingress of pests.	Y
4.4.8	Where they pose a risk to product, glass windows shall be protected against breakage.	Y
4.4.9	Doors shall be maintained in good condition. External doors and dock levellers shall be close fitting or adequately proofed. External doors to open product areas shall not be opened during production periods except in emergencies. Where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.	Y
4.4.10	Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.	Y
4.4.11	Where they constitute a risk to product, bulbs and strip lights – including those on electric fly-killer devices – shall be adequately protected. Where full protection cannot be provided, alternative management such as wire mesh screens or monitoring procedures shall be in place.	Y
4.4.12	Adequate ventilation and extraction shall be provided in product storage and processing environments to prevent condensation or excessive dust.	N



4.4.13	High-risk areas shall be supplied with sufficient changes of filtered air. The filter specification used and frequency of air changes shall be documented. This shall be based on a risk assessment, taking into account the source of the air and the requirement to maintain a positive air pressure relative to the surrounding areas.	N/A
4.5	Utilities – water, ice, air and other gases	
<p>Utilities constructed, maintained and monitored to a good degree. The water used for cleaning and process is mains water. This has been tested 4 times a year for both microbiological and chemical quality (e.g. 5/12, 17/9, 14/6 and 13/ 3 2013) The samples are analysed by (ISO 17025 accredited laboratory). Water quality is defined as a general control measure. A water distribution plan is available. Quality of water is monitored in an adequate way.</p> <p>The air is controlled by regular filter changes (yearly). Compressed air is used for equipment and to clean.</p>		
Statement of Intent	Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination.	Y
4.5.1	All water used as a raw material in the manufacture of processed food, the preparation of product, or for equipment or plant cleaning shall be supplied in sufficient quantity, be potable at point of use or pose no risk of contamination according to applicable legislation. The microbiological and chemical quality of water shall be analysed at least annually. The sampling points and frequency of analysis shall be based on risk, taking into account the source of the water, on-site storage and distribution facilities, previous sample history and usage.	Y
4.5.2	An up-to-date plan shall be available of the water distribution system on site, including holding tanks, water treatment and water recycling as appropriate. The plan shall be used as a basis for water sampling and the management of water quality.	Y
4.5.3	Where legislation specifically permits the use of water which may not be potable for initial product cleaning (e.g. for the storage/washing of fish), the water shall meet the designated legal requirement for this operation.	N/A
4.5.4	Air, other gases and steam used directly in contact with or as an ingredient in products shall be monitored to ensure this does not represent a contamination risk. Compressed air used directly in contact with the product shall be filtered.	N/A



4.6	Equipment	
All equipment was seen as suitably designed and used to minimise potential contamination. The used equipment is suitable for its purpose. Use of well known brands of equipment for food applications. New equipment is purchased as required and specified. Conveyor belts of deboning line at the cutting department supplied with confirmation of approval for food use. Maintenance engineer is aware of the requirements.		
Statement of Intent	All food processing equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product.	Y
4.6.1	All equipment shall be constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.	Y
4.6.2	Equipment which is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable.	Y
4.7	Maintenance	
Equipment is maintained and on the planned maintenance system (). Registrations to confirm that the preventive maintenance or preventive controls have been carried out as planned are in place.		
Statement of Intent	An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.	Y
4.7.1	There shall be a documented planned maintenance schedule or condition monitoring system which includes all plant and processing equipment. The maintenance requirements shall be defined when commissioning new equipment.	Y
4.7.2	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment damage, the equipment shall be inspected at predetermined intervals, inspection results documented and appropriate action taken.	Y
4.7.3	Where temporary repairs are made, these shall be controlled to ensure the safety or legality of product is not jeopardised. These temporary measures shall be permanently repaired as soon as	Y

	practicable and within a defined timescale.	
4.7.4	The company shall ensure that the safety or legality of product is not jeopardised during maintenance and subsequent cleaning operations. Maintenance work shall be followed by a documented hygiene clearance procedure, which records that product contamination hazards have been removed from machinery and equipment.	Y
4.7.5	Materials used for equipment and plant maintenance and that pose a risk by direct or indirect contact with raw materials, intermediate and finished products, such as lubricating oil, shall be food grade.	Y
4.7.6	Engineering workshops shall be kept clean and tidy and controls shall be in place to prevent contamination risks to the product (e.g. provision of swarf mats at the entrance/exit of workshops).	Y
4.8	Staff facilities	
<p>There are two separate staff facilities(m/w): one for the employees of the slaughter department and one for the pork cutting and expedition department. The staff facilities were seen as satisfactory designed. They are in good order, clean and in a good state of maintenance. The surface of storage facilities (staff lockers) is in line with the number of employees. Based upon a risk assessment all zones are "low risk areas". Hand-washing facilities (with hand-free soap tap operation and single use paper towels) were provided in toilets and at entry points to production areas. Before entering the production areas a sole washer and hand disinfecting equipment is installed. The factory is totally non-smoking. Smoking is only allowed in a separated area of the rest room. Catering facilities are provided for staff.</p> <p>Minor: Used white clothes should be hanged outside the changing rooms during breaks. There was observed that employees did hang them in the cupboards with own clothes.</p>		
Statement of Intent	Staff facilities shall be sufficient to accommodate the required number of personnel, and shall be designed and operated to minimise the risk of product contamination. The facilities shall be maintained in good and clean condition.	Y
4.8.1	Designated changing facilities shall be provided for all personnel, whether staff, visitor or contractor. These shall be sited to allow direct access to the production, packing or storage	Y

	areas without recourse to any external area. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly (e.g. the provision of cleaning facilities for footwear).	
4.8.2	Storage facilities of sufficient size to accommodate personal items shall be provided for all personnel who work in raw material handling, preparation, processing, packing and storage areas.	Y
4.8.3	Outdoor clothing and other personal items shall be stored separately from workwear within the changing facilities. Facilities shall be available to separate clean and dirty workwear.	N
4.8.4	<p>Where an operation includes a high-care area, personnel shall enter via a specially designated changing facility with arrangements to ensure that protective clothing will not be contaminated before entry to the high-care area. The changing facilities shall incorporate the following requirements:</p> <ul style="list-style-type: none"> • clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing • dedicated footwear, by exception shoe coverings shall be provided for visitors only to be worn in the high-care area • an effective system shall be provided to segregate areas for wearing high-care from other footwear (e.g. a barrier or bench system) or there shall be an effective boot wash on entrance to the high-care area • protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care area • hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing • on entry to high-care areas, hand-washing and disinfection shall be provided. 	N/A
4.8.5	Where an operation includes a high-risk area , personnel shall enter via a specially designated changing facility at the entrance to the high-risk area. The changing facilities shall include the following requirements:	N/A

	<ul style="list-style-type: none"> • clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing • dedicated footwear shall be provided to be worn in the high-risk area • an effective system shall be provided to segregate areas for wearing high-risk and other footwear, e.g. a barrier or bench system • protective clothing shall be visually distinctive from that worn in other areas and shall not be worn outside of the high-risk area • hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing • on entry to high-risk areas, hand-washing and disinfection shall be provided. 	
4.8.6	<p>Suitable and sufficient hand-washing facilities shall be provided at access to, and at other appropriate points within, production areas. Such hand-wash facilities shall provide as a minimum:</p> <ul style="list-style-type: none"> • sufficient quantity of water at a suitable temperature • liquid soap • single use towels or suitably designed and located air driers • water taps with hand-free operation • advisory signs to prompt hand-washing. 	Y
4.8.7	<p>Toilets shall be adequately segregated and shall not open directly into production, packing and storage areas. Toilets shall be provided with hand-washing facilities comprising:</p> <ul style="list-style-type: none"> • basins with soap and water at a suitable temperature • adequate hand-drying facilities • advisory signs to prompt hand-washing. <p>Where hand-washing facilities within toilet facilities are the only facilities provided before re-entering production, the requirements of 4.8.6 shall apply and signs shall be in place to direct people to hand-wash facilities before entering production.</p>	Y
4.8.8	<p>Where smoking is allowed under national law, designated controlled smoking areas shall be provided which are both isolated from production areas to an extent that ensures smoke</p>	Y

	cannot reach the product and fitted with sufficient extraction to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall be provided at smoking facilities, both inside and at exterior locations.	
4.8.9	All food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas. Where eating of food is allowed outside during breaks, this shall be in suitable designated areas with appropriate control of waste.	Y
4.8.10	Where catering facilities are provided on the premises, they shall be suitably controlled to prevent contamination of product (e.g. as a source of food poisoning or introduction of allergenic material to the site).	Y
4.9	Chemical and physical product contamination control Raw material handling, preparation, processing, packing and storage areas	
<p>Control over cleaning chemicals on site was moderately demonstrated. Separate storage facility for cleaning chemicals in place (container). Authorised access by production department and cleaning contractor. MSDS available and specifications confirm suitability for use in food processing industries, all from</p> <p>The HACCP study has determined that metal detection is not necessary as CCP. The metal detector is checked during production by the employee of the slaughter by-products department. Only tongues are tested, because pigs can eat some small metal parts which can be found in tongues. Metal hazard is controlled by metal checks too (machine / knife intactness / numbered sets) in relation to the hazard analysis. Registration and corrective actions could be demonstrated. A knife handling policy is in place.</p> <p>A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. Glass / hard plastic audits are regularly carried out: by production department (daily pre-SSOP and SSOP) and by QA (reduced check: 1 x / month –and full inspection: 4 x / year, records of yearly overview was seen, last check dated 19/12/2013). Records of breakage and corrective actions are listed.</p> <p>Wooden pallets are not permitted in production.</p>		
Statement of Intent	Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.	Y
4.9.1	Chemical control	
4.9.1.1	Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical	Y

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	<p>contamination. These shall include as a minimum:</p> <ul style="list-style-type: none"> • an approved list of chemicals for purchase • availability of material safety data sheets and specifications • confirmation of suitability for use in a food processing environment • avoidance of strongly scented products • the labelling and/or identification of containers of chemicals at all times • segregated and secure storage with restricted access to authorised personnel • use by trained personnel only. 	
4.9.1.2	Where strongly scented or taint-forming materials have to be used, for instance for building work, procedures shall be in place to prevent the risk of taint contamination of products.	Y
4.9.2	Metal control	
4.9.2.1	There shall be a documented policy for the control of the use of sharp metal implements including knives, cutting blades on equipment, needles and wires. This shall include a record of inspection for damage and the investigation of any lost items. Snap-off blade knives shall not be used.	Y
4.9.2.2	The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided. Staples and paper clips shall not be used in open product areas. Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination.	Y
4.9.3	Glass, brittle plastic, ceramics and similar materials	
4.9.3.1	Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination.	Y
4.9.3.2	<p>Documented procedures for handling glass and other brittle materials shall be in place and implemented to ensure that necessary precautions are taken. Procedures shall include as a minimum:</p> <ul style="list-style-type: none"> • a list of items detailing location, number, type and condition 	Y

	<ul style="list-style-type: none"> recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product details on cleaning or replacing items to minimise potential for product contamination. 	
4.9.3.3	<p>Documented procedures detailing the action to be taken in case of breakage of glass or other brittle items shall be implemented and include the following:</p> <ul style="list-style-type: none"> quarantining the products and production area that were potentially affected cleaning the production area inspecting the production area and authorising to continue production changing of workwear and inspection of footwear specifying those staff authorised to carry out the above points recording the breakage incident. 	Y
4.9.3.4	Products packed into glass or other brittle containers	
4.9.3.4.1	The storage of the containers shall be segregated from the storage of raw materials, product or other packaging.	N/A
4.9.3.4.2	<p>Systems shall be in place to manage container breakages between the container cleaning/inspection point and container closure. This shall include, as a minimum, documented instructions which ensure:</p> <ul style="list-style-type: none"> the removal and disposal of at-risk products in the vicinity of the breakage; this may be specific for different equipment or areas of the production line. the effective cleaning of the line or equipment which may be contaminated by fragments of the container. Cleaning shall not result in the further dispersal of fragments, for instance by the use of high pressure water or air. the use of dedicated, clearly identifiable cleaning equipment (e.g. colour coded) for removal of container breakages. Such equipment shall be stored separately from other cleaning equipment. the use of dedicated, accessible lidded waste containers for the collection of damaged containers and fragments. a documented inspection of production equipment is 	N/A

	<p>undertaken following the cleaning of a breakage to ensure cleaning has effectively removed any risk of further contamination.</p> <ul style="list-style-type: none">• authorisation is given for production to re-start following cleaning.• the area around the line is kept clear of broken glass.	
4.9.3.4.3	Records shall be maintained of all container breakages on the line. Where no breakages have occurred during a production period, this shall also be recorded. This record shall be reviewed to identify trends and potential line or container improvements.	N/A
4.9.4	Wood	
4.9.4.1	Wood should not be used in open product areas except where this is a process requirement (e.g. maturation of products in wood). Where the use of wood cannot be avoided, the condition of wood shall be continually monitored to ensure it is in good condition and free from damage or splinters which could contaminate products.	Y
4.10	Foreign body detection and removal equipment	
<p>Foreign body alertness has the attention of all people dealing with products. Metal detection device (CP) is applied for tongues. Appropriate foreign body detection equipment is in place. Effective operation of metal detection equipment demonstrated. Metal detector is located at the slaughter by-products department for testing tongues (on crate level). Maintenance of metal detector is subcontracted. Level of sensitivity: 4,0 mm Ferrous – 5,0 mm Non Ferrous – 6,0 mm Stainless Steel. Operation of metal detector checked during the on-site audit. Control of metal detection implemented (start-up, end). Regular testing is demonstrated. Automatic alarm and belt stop in place. The metal procedure covers corrective action in case of metal detection and failure of metal detection upon testing.</p> <p>No consumer packed end products are applicable.</p>		
Statement of Intent	The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies.	Y
4.10.1	Foreign body detection and removal equipment	
4.10.1.1	A documented assessment in association with the HACCP study shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign body contamination. Typical equipment to be considered may include:	Y

	<ul style="list-style-type: none"> • filters • sieves • metal detection • magnets • optical sorting equipment • X-ray detection equipment • other physical separation equipment e.g. gravity separation, fluid bed technology. 	
4.10.1.2	The type, location and sensitivity of the detection and/or removal method shall be specified as part of the company's documented system. Industry best practice shall be applied with regard to the nature of the ingredient, material, product and/or the packed product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified.	Y
4.10.1.3	<p>The company shall ensure that the frequency of the testing of the foreign body detection and/or removal equipment is defined and takes into consideration:</p> <ul style="list-style-type: none"> • specific customer requirements • the company's ability to identify, hold and prevent the release of any affected materials, should the equipment fail. 	Y
4.10.1.4	Where foreign material is detected or removed by the equipment, the source of any unexpected material shall be investigated. Information on rejected materials shall be used to identify trends and where possible instigate preventive action to reduce the occurrence of contamination by the foreign material.	Y
4.10.2	Filters and sieves	
4.10.2.1	Filters and sieves used for foreign body control shall be of a specified mesh size or gauge and designed to provide the maximum practical protection for the product. Material retained or removed by the system shall be examined and recorded to identify contamination risks.	N/A
4.10.2.2	Filters and sieves shall be regularly inspected or tested for damage on a documented frequency based on risk. Records shall be maintained of the checks. Where defective filters or sieves are identified this shall be recorded and the potential for contamination of products investigated and appropriate action	N/A



	taken.	
4.10.3	Metal detectors and X-ray equipment	
4.10.3.1	Metal detection equipment shall be in place unless risk assessment demonstrates that this does not improve the protection of final products from metal contamination. Where metal detectors are not used justification shall be documented. The absence of metal detection would only normally be based on the use of an alternative, more effective, method of protection (e.g. use of X-ray, fine sieves or filtration of products).	Y
4.10.3.2	Where metal detectors or X-ray equipment is used, this shall be situated at the latest practical step in the process flow and, wherever possible, after the product has been packaged.	Y
4.10.3.3	The metal detector or X-ray equipment shall incorporate one of the following: <ul style="list-style-type: none"> an automatic rejection device, for continuous in-line systems, which shall either divert contaminated product out of the product flow or to a secure unit accessible only to authorised personnel a belt stop system with an alarm where the product cannot be automatically rejected, e.g. for very large packs in-line detectors which identify the location of the contaminant shall be operated to allow effective segregation of the affected product. 	Y
4.10.3.4	The company shall establish and implement documented procedures for the operation and testing of the metal or X-ray equipment. This shall include as a minimum: <ul style="list-style-type: none"> responsibilities for the testing of equipment the operating effectiveness and sensitivity of the equipment and any variation to this for particular products the methods and frequency of checking the detector recording of the results of checks. 	Y
4.10.3.5	Metal detector checking procedures shall be based on best practice and shall as a minimum include:	Y

	<ul style="list-style-type: none"> • use of test pieces incorporating a sphere of metal of a known diameter. The test pieces shall be marked with the size and type of test material contained. • tests carried out using separate test pieces containing ferrous metal, stainless steel and typically non-ferrous metal, unless the product is within a foil container. • a test that both the detection and rejection mechanisms are working effectively under normal working conditions. • checks that test the memory/reset function of the metal detector by passing successive test packs through the unit. <p>In addition, where metal detectors are incorporated on conveyors:</p> <ul style="list-style-type: none"> • the test piece shall be passed as close as possible to the centre of the metal detector aperture and wherever possible be carried out by inserting the test piece within a clearly identified sample pack of the food being produced at the time of the test. <p>Where in-line metal detectors are used the test piece shall be placed in the product flow wherever this is possible.</p>	
4.10.3.6	The company shall establish and implement corrective action and reporting procedures in the event of the testing procedure identifying any failure of the foreign body detector. Action shall include a combination of isolation, quarantining and re-inspection of all product produced since the last successful test.	Y
4.10.4	Magnets	
4.10.4.1	The type, location and the strength of magnets shall be fully documented. Documented procedures shall be in place for the inspection, cleaning, strength testing and integrity checks. Records of all checks shall be maintained.	N/A
4.10.5	Optical sorting equipment	
4.10.5.1	Each unit shall be checked in accordance with the manufacturer's instructions or recommendations. Checks shall be documented.	N/A
4.10.6	Container cleanliness – glass jars, cans and other rigid containers	
4.10.6.1	Based on risk assessment, procedures shall be implemented to minimise foreign body contamination originating with the	N/A

	packaging container (e.g. jars, cans and other preformed rigid containers). This may include the use of covered conveyors, container inversion and foreign body removal through rinsing with water or air jets.	
4.10.6.2	The effectiveness of the container cleaning equipment shall be checked and recorded during each production. Where the system incorporates a rejection system for dirty or damaged containers, the check shall incorporate a test of both the detection and effective rejection of the test container.	N/A
4.11	Housekeeping and hygiene	
<p>There is an internal Facility service department dealing with housekeeping. Cleaning was done by subcontractor till the beginning of 2013, then has taken over. Because of non satisfaction of VION Apeldoorn, has taken over now since the summer. Also own employees are doing a part of the cleaning. is cleaning in the evening / at night when production has stopped. Cleaning schedules are available and cover equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). These detail the chemicals to use, precautions to take and method of cleaning. Cleaning and disinfection chemicals are fit for purpose. Specification seen of cleaning agents and disinfectants (). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) executed on demand. Assessed for the by products department (2 times in 2013). The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP), hygienograms by means of agar (20 x / week) and microbiological analysis of carcasses and finished products. Swabs for pathogenic bacteria like Listeria are taken when product analysis results reveal the incidence of Listeria. Records of checks are maintained and were sampled during the audit. Although not legally required, sampling on Listeria shows a regular presence of this pathogenic microbe. Just before the audit, there is changed with the disinfection agency in the cutting department. Monthly residue tests are done (per acetic acid). Since 2 days some very high values are measured. Root cause is not found. Corrective action short term is sufficient: extra rinsing and next day residue tests again (daily at the moment) and contact with cleaning company.</p> <p>CIP is applicable at the blood tanks. But these tanks are owned and handled by the customer of the blood. The department manager daily checks the if the CIP is working well.</p> <p>Minor:</p> <p>Procedure and working method about check on cleaning performance is not working according to VION procedure.</p> <p>The schedule (= registration form) of agar checks (monthly all items must be checked)</p>		

is not used last weeks. Now a handwritten list is used.

The department of storage organs (and metal detection of crates with tongues) is cleaned daily, but no agar / residue checks of this room on a monthly base (although VION central procedure mentions: every department must be checked). Only from the metal detector in this room agar checks are seen about quarterly.

FUNDAMENTAL Statement of Intent	Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimised.	Y
4.11.1	<p>Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures shall as a minimum include the:</p> <ul style="list-style-type: none"> responsibility for cleaning item/area to be cleaned frequency of cleaning method of cleaning, including dismantling equipment for cleaning purposes where required cleaning chemicals and concentrations cleaning materials to be used cleaning records and responsibility for verification. <p>The frequency and methods of cleaning shall be based on risk.</p> <p>The procedures shall be implemented to ensure appropriate standards of cleaning are achieved.</p>	Y
4.11.2	<p>Limits of acceptable and unacceptable cleaning performance shall be defined, based on the potential hazards (e.g. microbiological, allergen or foreign body contamination). Acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see Glossary), microbiological testing or chemical testing as appropriate. The cleaning and disinfection procedures and frequency shall be validated and records maintained.</p>	N
4.11.3	<p>The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning.</p>	Y



4.11.4		The cleanliness of equipment shall be checked before equipment is released back into full production. The results of checks on cleaning, including visual, analytical and microbiological checks, shall be recorded and used to identify trends in cleaning performance and instigate improvements where required.	Y
4.11.5		<p>Cleaning equipment shall be:</p> <ul style="list-style-type: none"> • fit for purpose • suitably identified for intended use, e.g. colour coded or labelled • cleaned and stored in a hygienic manner to prevent contamination. <p>Equipment used for cleaning in high-care and high-risk areas shall be dedicated for use in that area.</p>	Y
4.11.6		Cleaning in place (CIP)	
4.11.6.1		Cleaning-in-place (CIP) facilities, where used, shall be monitored and maintained to ensure their effective operation.	Y
4.11.6.2		<p>A schematic plan of the layout of the CIP system shall be available. There shall be an inspection report or other verification that:</p> <ul style="list-style-type: none"> • systems are hygienically designed with no dead areas, limited interruptions to flow streams and good system drain ability. • scavenge pumps are operated to ensure that there is no build-up of cleaning fluids in the vessels. • spray balls effectively clean vessels by providing full surface coverage and are periodically inspected for blockages. Rotating spray devices should have a defined operational time. • CIP equipment has adequate separation from active product lines, e.g. through the use of double seat valves, manually controlled links or blanks in pipework. <p>The system shall be revalidated following alterations or additions to the CIP equipment. A log of changes to the CIP system shall be maintained.</p>	Y



4.11.6.3	<p>The CIP equipment shall be operated to ensure effective cleaning is carried out:</p> <ul style="list-style-type: none">• The process parameters, time, detergent concentrations, flow rate and temperatures shall be defined to ensure removal of the appropriate target hazard, e.g. soil, allergens, vegetative microorganisms, spores. This shall be validated and records of the validation maintained.• Detergent concentrations shall be checked routinely.• Process verification shall be undertaken by analysis of rinse waters and/or first product through the line for the presence of cleaning fluids or by tests of ATP (bioluminescence techniques) allergens or micro-organisms as appropriate.• Detergent tanks shall be kept stocked up and a log maintained of when these are filled and emptied. Recovered pre-rinse solutions shall be monitored for a build-up of carry-over from the detergent tanks.• Filters, where fitted, shall be cleaned and inspected at a defined frequency.	Y
4.12	Waste/waste disposal	
<p>Good control was seen over the collection and disposal of waste. Waste disposal is handled by licensed contractors: (paper, plastic, etc), (category 2-3 material) and (blood). A register is kept. Legal requirements are met, e.g. separate storage and clear identification.</p>		
Statement of Intent	Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.	Y
4.12.1	Where licensing is required for the disposal of categorised waste, it shall be removed by licensed contractors and records of disposal shall be maintained and available for audit.	Y
4.12.2	Food products intended to be supplied for animal feed shall be segregated from waste and managed in accordance with relevant legislative requirements.	Y
4.12.3	<p>External waste collection containers and rooms housing waste facilities shall be managed to minimise risk. These shall be:</p> <ul style="list-style-type: none">• clearly identified• designed for ease of use and effective cleaning• well-maintained to allow cleaning and, where required,	Y



	<p>disinfection</p> <ul style="list-style-type: none"> emptied at appropriate frequencies covered or doors kept closed as appropriate. 	
4.12.4	If unsafe products or substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in secure product or waste disposal and shall provide records which includes the quantity of waste collected for destruction or disposal.	Y
4.13	Pest control	
<p>An external pest control contractor was used. In 2013, VION has changed from contractor. Now there is a contract with : the pest control of rodents (rats and mice), crawling and flying insects. The frequency of control is 8 x / year; maintenance of EFK is 1 x / year and determination. Reporting in a digital system (web based). Results of regular visits assessed. No issues or longer outstanding action points. Up to date site plans is available to show the location of rodent baits, mouse traps, crawling and flying insect control units. The pest control file does detail the baits / pesticides used with material safety data sheets (MSDS) being available. Findings on the various bait points are collected in a history. Trend 2013 assessed. Actions were recorded on reports and at management review. Frequency of the in-depth pest control survey is risk based. In-depth surveys are planned yearly, based on risk assessment (advises yearly). Last reported on 10/7/2013.</p>		
Statement of Intent	The whole site shall have an effective preventive pest control programme in place to minimise the risk of infestation and there shall be the resources available to rapidly respond to any issues which occur to prevent risk to products.	Y
4.13.1	The company shall either contract the services of a competent pest control organisation, or shall have appropriately trained staff, for the regular inspection and treatment of the site to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and shall be documented. Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.	Y
4.13.2	<p>Where a company undertakes its own pest control, it shall be able to effectively demonstrate that:</p> <ul style="list-style-type: none"> pest control operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and 	N/A



	<p>understand the limitations of use, relevant to the biology of the pests associated with the site</p> <ul style="list-style-type: none"> • sufficient resources are available to respond to any infestation issues • there is ready access to specialist technical knowledge when required • legislation governing the use of pest control products is understood • dedicated locked facilities are used for the storage of pesticides. 	
4.13.3	<p>Pest control documentation and records shall be maintained. This shall include as a minimum:</p> <ul style="list-style-type: none"> • an up-to-date plan of the full site identifying numbered pest control device locations • identification of the baits and/or monitoring devices on site • clearly defined responsibilities for site management and for the contractor • details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies • any observed pest activity • details of pest control treatments undertaken. 	Y
4.13.4	<p>Bait stations shall be robust, of tamper resistant construction, secured in place and appropriately located to prevent contamination risk to product. Missing bait boxes shall be recorded, reviewed and investigated. Toxic rodent baits shall not be used within production areas or storage areas where open product is present except when treating an active infestation.</p>	Y
4.13.5	<p>Fly-killing devices and/or pheromone traps shall be correctly sited and operational. If there is a danger of insects being expelled from a fly-killing extermination device and contaminating the product, alternative systems and equipment shall be used.</p>	Y
4.13.6	<p>In the event of infestation, or evidence of pest activity, immediate action shall be taken to eliminate the hazard. Any potentially affected products should be subject to the non-conforming product procedure.</p>	Y



4.13.7	Records of pest control inspections, pest proofing and hygiene recommendations and actions taken shall be maintained. It shall be the responsibility of the company to ensure all of the relevant recommendations made by their contractor or in-house expert are carried out in a timely manner.	Y
4.13.8	An in-depth, documented pest control survey shall be undertaken at a frequency based on risk, but typically quarterly, by a pest control expert to review the pest control measures in place. The timing of the survey shall be such as to allow access to equipment for inspection where a risk of stored product insect infestation exists.	Y
4.13.9	<p>Results of pest control inspections shall be assessed and analysed for trends on a regular basis, but as a minimum:</p> <ul style="list-style-type: none">• in the event of an infestation• annually <p>This shall include a catch analysis from trapping devices to identify problem areas. The analysis shall be used as a basis for improving the pest control procedures.</p>	Y
4.14	Storage facilities	
Internal storage in 18 separated cold stores. Neither chiller nor freezer. General handling procedure and temperature control (with automatic temperature monitoring and alarm system) is applicable during storage and loading of the products. No outside storage applicable.		
Statement of Intent	All facilities used for the storage of ingredients, in-process product and finished products shall be suitable for its purpose.	Y
4.14.1	<p>Documented procedures to maintain product safety and quality during storage shall be developed on the basis of risk assessment, understood by relevant staff and implemented accordingly. These may include as appropriate:</p> <ul style="list-style-type: none">• managing chilled and frozen product transfer between temperature controlled areas• segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake• storing materials off the floor and away from walls	Y

	<ul style="list-style-type: none">specific handling or stacking requirements to prevent product damage.	
4.14.2	Where temperature control is required, the storage area shall be capable of maintaining product temperature within specification and operated to ensure specified temperatures are maintained. Temperature recording equipment with suitable temperature alarms shall be fitted to all storage facilities or there shall be a system of recorded manual temperature checks, typically on at least a four-hourly basis or at a frequency which allows for intervention before product temperatures exceed defined limits for the safety, legality or quality of products.	Y
4.14.3	Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the storage conditions.	Y
4.14.4	Where storage outside is necessary, items shall be protected from contamination and deterioration.	N/A
4.14.5	Receipt documents and/or product identification shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life.	Y
4.15	Dispatch and transport	
Dispatch and release of products is based upon temperature measurements at CCP level. Products and trailers are inspected before loading. Product is loaded in covered bays. Rules for drivers are well implemented. All transport is subcontracted following the central arranged procedure. VION Food (central office) is contract owner. The content of the contract complies with the requirements. VION reviews the performance of these transport companies		
Statement of Intent	Procedures shall be in place to ensure that the management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety or quality of the products.	Y
4.15.1	Documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include as appropriate:	Y

	<ul style="list-style-type: none"> controlling temperature of loading dock areas the use of covered bays for vehicle loading or unloading securing loads on pallets to prevent movement during transit inspection of loads prior to dispatch. 	
4.15.2	Traceability shall be ensured during transportation. There shall be a clear record of dispatch and receipt of goods and materials demonstrating that sufficient checks have been completed during the transfer of goods.	Y
4.15.3	<p>All vehicles or containers used for the dispatch of products shall be inspected prior to loading to ensure that they are fit for purpose. This shall ensure that they are:</p> <ul style="list-style-type: none"> in a suitably clean condition free from strong odours which may cause taint to products suitably maintained to prevent damage to products during transit equipped to ensure any temperature requirements can be maintained. <p>Records of inspections shall be maintained.</p>	Y
4.15.4	Where temperature control is required, the transport shall be capable of maintaining product temperature within specification, under minimum and maximum load. Temperature data-logging devices which can be interrogated to confirm time/temperature conditions or a system to verify and record at predetermined frequencies the correct operation of refrigeration equipment shall be used and records maintained.	Y
4.15.5	Maintenance systems and documented cleaning procedures shall be maintained for all vehicles and equipment used for loading/unloading (e.g. hoses connecting to silo installations). There shall be records of the measures taken.	Y
4.15.6	<p>The company shall have documented procedures for the transport of products, which shall include:</p> <ul style="list-style-type: none"> any restrictions on the use of mixed loads requirements for the security of products during transit, particularly when vehicles are parked and unattended 	Y

	<ul style="list-style-type: none"> clear instructions in the case of vehicle breakdown, accident or failure of refrigeration systems which ensure the safety of the products is assessed and records maintained. 	
4.15.7	Where the company employs third-party contractors, all the requirements specified in this section shall be clearly defined in the contract and verified or the contracted company shall be certificated to the Global Standard for Storage and Distribution or similar internationally recognised Standard.	Y

5. Product control

5.1 Product design/development

No product design takes place at this site. No consumer end products are applicable. At central level a development procedure is available. Systematic HACCP analysis and food safety assessment is taking place in the process of developing new products or modifying existing products. Also no changes in processing lines. For 2014 an extension of the building is planned, so validation has to be done. Important issues for the specification are the weight and cut. New cuttings are tested first in the production departments and samples are discussed with the customer before a new product is accepted. Factory trials are undertaken. Regular shelf life testing takes place according to 'Houdbaarheidsonderzoeken', mostly done by VION plants who deliver to customers. Every site figures in the VION group plan. No claims about nutrition made.

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



	introduced into the factory environment.	
5.1.3	Trials using production equipment shall be carried out where it is necessary to validate that product formulation and manufacturing processes are capable of producing a safe product of the required quality.	Y
5.1.4	Shelf-life trials shall be undertaken using documented protocols reflecting conditions experienced during storage and handling. Results shall be recorded and retained and shall confirm compliance with relevant microbiological, chemical and organoleptic criteria. Where shelf-life trials prior to production are impractical, for instance for some long-life products, a documented science-based justification for the assigned shelf life shall be produced.	Y
5.1.5	All products shall be labelled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe.	Y
5.1.6	Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutritional claim, reduced sugar), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.	N/A
5.2	Management of allergens	
No allergens are used, only fresh meat under current scope.		
FUNDAMENTAL Statement of Intent	The company shall have a developed system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling.	N/A
5.2.1	The company shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens (refer to glossary). This shall include review of raw material specifications and, where required, obtain additional	N/A



	information from suppliers, for example through questionnaires to understand the allergen status of the raw material, its ingredients and the factory in which it is produced.	
5.2.2	The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products and any new product development ingredients or products.	N/A
5.2.3	<p>A documented risk assessment shall be carried out to identify routes of contamination and establish documented policies and procedures for handling raw materials, intermediate and finished products to ensure cross-contamination is avoided. This shall include:</p> <ul style="list-style-type: none"> • consideration of the physical state of the allergenic material, i.e. powder, liquid, particulate • identification of potential points of cross-contamination through the process flow • assessment of the risk of allergen cross-contamination at each process step • identification of suitable controls to reduce or eliminate the risk of cross-contamination. 	N/A
5.2.4	<p>Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination into products not containing the allergen. This shall include as appropriate:</p> <ul style="list-style-type: none"> • physical or time segregation whilst allergen-containing materials are being stored, processed or packed • the use of separate or additional protective over clothing when handling allergenic materials • use of identified, dedicated equipment and utensils for processing • scheduling of production to reduce changes between products containing an allergen and products not containing the allergen • systems to restrict the movement of airborne dust containing allergenic material • waste handling and spillage controls • restrictions on food brought onto site by staff, visitors, 	N/A

	contractors and for catering purposes.		
5.2.5	Where rework is used, or reworking operations carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.		N/A
5.2.6	Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning shall be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.		N/A
5.2.7	Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the company shall ensure that the production process is fully validated to meet the stated claim. This shall be documented.		N/A
5.2.8	Equipment or area cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated to ensure they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.		N/A
5.2.9		All relevant personnel, including engineers, temporary staff and contractors, shall have received general allergen awareness training and be trained in the company's allergen-handling procedures.	N/A
5.2.10		An effective system of documented checks shall be in place at line start-up, following product changeover and changes in batches of packaging to ensure that the labels applied are correct for the products packed.	N/A
5.3	Provenance, assured status and claims of identity preserved materials		
No GMO free is provided to customers. Identity preservation is applicable for the organic status (SKAL) and livestock status ("Good Farming – Welfare (=WF)", "IKB" or Q+S or "Standard") and demonstrated during the visit. Mass balance is done half yearly for WF: 9/12/2013 and QS 8/1/2014 (Q+ S started October 2013).			
Segregation and correct identification established. (Plant is certified for organic, but no organic production last year).			



Statement of Intent	Systems of traceability, identification and segregation of raw materials, intermediate and finished products shall be in place to ensure that all claims relating to provenance or assured status can be substantiated.	Y
5.3.1	Where claims are to be made on finished packs about the provenance, assured or 'identity preserved' status (see Glossary) of raw materials used, the status of each batch of the raw material shall be verified and records maintained.	Y
5.3.2	Where a claim is made relating to the provenance, assured or identity preserved status of a product or ingredient, the facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims. The company shall undertake documented mass balance tests at least every six months and at a frequency to meet the particular scheme requirements.	Y
5.3.3	The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims.	Y
5.4	Product Packaging	
Packaging is segregated from raw materials and finished products. Return of packaging materials towards storage area does not take place. Coloured in liners are applied depending on the content. Based upon sampling packaging materials specifications reveal food safe declaration, e.g. Regulation 1935/2004/EC. Packaging of products from vertical audit checked (foil and bags , , assessed including declaration of conformity.		
Statement of Intent	Product packaging shall be appropriate for the intended use and shall be stored under conditions to minimise contamination and deterioration.	Y
5.4.1	When purchasing or specifying food contact packaging the supplier of packaging materials shall be made aware of any particular characteristics of the food (e.g. high fat content, pH or usage conditions such as microwaving) which may affect packaging suitability. Certificates of conformity or other evidence shall be available for product packaging to confirm it conforms to relevant food safety legislation and is suitable for its intended use.	Y



5.4.2	Where appropriate, packaging shall be stored away from raw materials and finished product. Any part-used packaging materials suitable for use shall be effectively protected from contamination and clearly identified before being returned to an appropriate storage area. Obsolete packaging shall be stored in a separate area and systems shall be in place to prevent accidental use.	Y
5.4.3	Product contact liners (or raw material/work-in-progress contact liners) purchased by the company shall be appropriately coloured and resistant to tearing to prevent accidental contamination.	Y
5.5	Product inspection and laboratory testing	
<p>Pigs are controlled by a veterinarian during the arrival at the slaughter department and during the process in the clean slaughter line. All analyses (hygienograms, microbiology and chemical research) are subcontracted to an accredited laboratory operating in accordance with ISO 17025: . A microbiological monitoring program is in place. The frequency of monitoring depends on the risk:</p> <ul style="list-style-type: none">• Carcasses: daily microbiological analysis of TPC, entero's, Salmonella (process hygiene);• Primary cuts and trimmings: 1 x / 2 weeks microbiological analysis of TPC, entero's, Salmonella and Listeria.• By-products and organs: 1 x / 4 weeks microbiological analysis of TPC and entero's. <p>Results of TPC and pathogens (every thousand carcass) are analysed and reported on a monthly basis (KPI reporting). Trend graphs are applied. Results of 2013 / 2014 demonstrate compliance with the defined specifications. Assessed for collars, tongues and trimmings. Product testing in the external laboratory concerns Trichinella testing.</p> <p>Minor: Dec. 2013 is Listeria found on meat and on equipment after cleaning in cutting department. A3 improvement project is started, but root cause is not found till now (11 possible root causes are mentioned and investigation is ongoing). (NVWA is informed due the CCMT project</p>		
Statement of Intent	The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.	Y
5.5.1	Product inspection and testing	
5.5.1.1	There shall be a scheduled programme of testing covering	Y

	products and the processing environment which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented.	
5.5.1.2	Test and inspection results shall be recorded and reviewed regularly to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	N
5.5.1.3	The company shall ensure that a system of on-going shelf-life assessment is in place. This shall be based on risk and shall include microbiological and sensory analysis as well as relevant chemical factors such as pH and aw. Records and results from shelf life tests shall validate the shelf life period indicated on the product.	Y
5.5.2	Laboratory testing	
5.5.2.1	Pathogen testing shall be subcontracted to an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the manufacturing site and have operating procedures to prevent any risk of product contamination.	Y
5.5.2.2	Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. Controls shall be documented, implemented and shall include consideration of the following: <ul style="list-style-type: none"> • design and operation of drainage and ventilation systems • access and security of the facility • movement of laboratory personnel • protective clothing arrangements • processes for obtaining product samples • disposal of laboratory waste. 	N/A
5.5.2.3	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. Documented justification shall be	Y

	available where accredited methods are not undertaken.	
5.5.2.4	<p>Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in 5.5.2.3. These shall include:</p> <ul style="list-style-type: none">• use of recognised test methods, where available• documented testing procedures• ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required• use of a system to verify the accuracy of test results, e.g. ring or proficiency testing• use of appropriately calibrated and maintained equipment.	N/A
5.6	Product release	
<p>Product release is based upon product temperature measurements (CCP) before dispatch. Product release is based upon product temperature measurements (CCP) before dispatch. 5 samples are taken from every batch. Checked during vertical audit and site tour. Finished product is released unless it is in blockade. Only authorised personnel is allowed to release products following 'Blokkeren'. Product release is done by the QA Manager / Plant Manager / departmental manager.</p> <p>During the tour 2 times an issue was noticed. A carcass fallen on floor in warm slaughter and oil leakage on carcase. Both issues were mentioned by the management (during the audit tour the manager was organizing the corrective actions).</p>		
Statement of Intent	The company shall ensure that finished product is not released unless all agreed procedures have been followed.	Y
5.6.1	Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and release authorised.	Y

6. Process Control

6.1 Controls of operations

The site clearly demonstrated a good control of operations. 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. Processes are validated to demonstrate that the process is capable of producing safe, legal and quality products. Process control is based upon the HACCP

study, legal and customer requirements. Documented start up checks are applied.

Minor: Condense on evaporators organs cellar not seen in SSOP/ Pre SSOP. Same issue is missing in SSOP / Pre SSOP for condense (or drops leftovers from cleaning water) on ceiling corridor / storage room next to organs cellars. On the second audit day the condense problem was solved due reparation by TD. TD has done reparation and has planned to change the system to prevent reoccurrence.

FUNDAMENTAL Statement of Intent	The company shall operate to documented procedures and/or work instructions that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan.	Y
6.1.1	<p>Documented process specifications and work instructions shall be available for the key processes in the production of products to ensure product safety, legality and quality. The specifications as appropriate shall include:</p> <ul style="list-style-type: none"> • recipes – including identification of any allergens • mixing instructions, speed, time • equipment process settings • cooking times and temperatures • cooling times and temperatures • labelling instructions • coding and shelf life marking • any additional critical control points identified in the HACCP plan. 	Y
6.1.2	Process monitoring, such as of temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification.	Y
6.1.3	In circumstances where process parameters are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested.	Y
6.1.4	Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated at a frequency based on risk and performance of equipment (e.g. heat distribution in retorts, ovens and processing vessels;	Y

		temperature distribution in freezers and cold stores).	
6.1.5		In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken.	Y
6.1.6		Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleaned and are ready for production. Documented checks shall be carried out at product changes to ensure all products and packaging from the previous production have been removed from the line before changing to the next production.	N
6.1.7		Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks at the start of packing, during the packaging run, following packaging changes and when changing batches of packaging materials, in order to ensure that correct packaging materials are used. The procedures shall also include verification of any code information or other printing carried out at the packing stage.	Y
6.2	Quantity-weight, volume and number control		
All products are sold by weight. Metrology controls the balances for commercial purpose. The devices are tested internally on a daily basis. Weighing equipment (legal) is calibrated once a year. Records were available (12/2/2013 of ham balance line 12). No issues identified.			
Statement of Intent	The company shall operate a quantity control system which conforms to legal requirements in the country where the product is sold and any additional industry sector codes or specified customer requirement.		Y
6.2.1	The frequency and methodology of quantity checking shall meet the requirements of appropriate legislation governing quantity verification, and records of checks shall be maintained.		Y
6.2.2	Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer requirements and records shall be maintained.		Y

6.3	Calibration and control of measuring and monitoring devices	
Calibration procedures ensure relevant equipment is identified and regularly calibrated. Critical measuring equipment are thermometers (CCP related) and weighing scales. Calibration with 2-monthly frequency (thermometers CCP), 6-monthly frequency (other thermometers) or yearly frequency (balances, probes) is adequate according to the calibration records. No adjustments are possible. Records checked: Thermo sensor calibrated 8/1/2013 (is planned for next week).		
Statement of Intent	The company shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.	Y
6.3.1	<p>The company shall identify and control measuring equipment used to monitor CCPs, product safety and legality. This shall include as a minimum:</p> <ul style="list-style-type: none">• a documented list of equipment and its location• an identification code and calibration due date• prevention from adjustment by unauthorised staff• protection from damage, deterioration or misuse.	Y
6.3.2	<p>All identified measuring devices, including new equipment, shall be checked and where necessary adjusted:</p> <ul style="list-style-type: none">• at a predetermined frequency, based on risk assessment• to a defined method traceable to a recognised national or international Standard where possible. <p>Results shall be documented. Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform.</p>	Y
6.3.3	Reference measuring equipment shall be calibrated and traceable to a recognised national or international Standard and records maintained.	Y
6.3.4	Procedures shall be in place to record actions to be taken when the prescribed measuring and monitoring devices are found not to be operating within specified limits. Where the safety or legality of products is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale.	Y

7. Personnel		
7.1	Training Raw material handling, preparation, processing, packing and storage areas	
<p>There was evidence of introduction training for new starters and refreshment training of employees. Competency training had taken place for the staff sampled (food safety and quality).</p> <p>Records of CCP training were sampled for were and available. Employees involved in CCP's are daily doing a verification on CCP (by doing a check together with the manager, records are made). Refresher training is carried out every 3 years for personnel involved in monitoring activities. Records of (like metal detection) checked for records for hygiene training seen from (temporary employee). Procedure: Hygiene regulations are available in multiple languages.</p>		
FUNDAMENTAL Statement of Intent	The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification.	Y
7.1.1	All relevant personnel, including temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.	Y
7.1.2	Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place.	Y
7.1.3	<p>The company shall put in place documented programmes covering the training needs of relevant personnel. These shall include as a minimum:</p> <ul style="list-style-type: none"> identifying the necessary competencies for specific roles providing training or other action to ensure staff have the necessary competencies reviewing the effectiveness of training the delivery of training in the appropriate language of trainees. 	Y
7.1.4	<p>Records of all training shall be available. This shall include as a minimum:</p> <ul style="list-style-type: none"> the name of the trainee and confirmation of attendance 	Y

	<ul style="list-style-type: none"> the date and duration of the training the title or course contents, as appropriate the training provider. <p>Where training is undertaken by agencies on behalf of the company, records of the training shall be available.</p>	
7.1.5	The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.	Y
7.2	Personal hygiene Raw material handling, preparation, processing, packing and storage areas	
The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel through brochure "Werken bij VION" (in different languages) prior to commencing work. These hygiene rules are effectively enforced.		
Statement of Intent	The company's personal hygiene standards shall be appropriate to the products produced, documented, and adopted by all personnel, including agency staff, contractors and visitors to the production facility.	Y
7.2.1	<p>The requirements for personal hygiene shall be documented and communicated to all personnel. This shall include as a minimum the following requirements:</p> <ul style="list-style-type: none"> Watches shall not be worn. Jewellery shall not be worn, with the exception of a plain wedding ring or wedding wristband. Rings and studs in exposed parts of the body, such as ears, noses, tongues and eyebrows, shall not be worn. Fingernails shall be kept short, clean and unvarnished. False fingernails shall not be permitted. Excessive perfume or aftershave shall not be worn. <p>Compliance with the requirements shall be checked routinely.</p>	Y
7.2.2	Hand cleaning shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	Y



7.2.3	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue) and containing a metal detectable strip. These shall be company issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn.	Y
7.2.4	Where metal detection equipment is used, a sample from each batch of plasters shall be successfully tested through the equipment and records shall be kept.	Y
7.2.5	Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimise the risk of product contamination.	Y
7.3	Medical screening	
The medical screening is part of the intake of new employees and part of the instructions to visitors. The site makes all visitors, new starters and contractors aware of the need to report infectious disease via the food safety instruction. Employees, visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Persons who are suffering from a relevant infectious disease are not allowed to enter the production facilities. No remarks.		
Statement of Intent	The company shall ensure that procedures are in place to ensure that employees, agency staff, contractors or visitors are not a source of transmission of food-borne diseases to products.	Y
7.3.1	The company shall have a procedure which enables notification by employees, including temporary employees, of any relevant infection, disease or condition with which they may have been in contact or be suffering from.	Y
7.3.2	Where there may be a risk to product safety, visitors and contractors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from a condition which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas.	Y
7.3.3	There shall be documented procedures for employees, contractors and visitors, relating to action to be taken where they may be suffering from or have been in contact with an infectious	Y

	disease. Expert medical advice shall be sought where required.	
7.4	Protective clothing Employees or visitors to production areas	
<p>Company issued protective clothing (inclusive work shoes) is given to all staff and visitors. Protective clothing includes white or blue trousers, jackets and rubber boots / shoes. Hairnets are applied, all hair is enclosed. Mob hats are single use. Disposable gloves worn where necessary. Protective clothing is removed on leaving the production areas. Operators know the house rules very well on gloves. Good adherence to the dress code observed during the site evaluation. The external laundry () complies with the requirements of the Global Standard for Food Safety. This is a low risk operation.</p> <p>Working shoes can be worn outside, but do have to pass the shoe washer. chain mail, gloves and aprons are cleaned separately</p>		
Statement of Intent	Suitable company-issued protective clothing shall be worn by employees, contractors or visitors working in or entering production areas.	Y
7.4.1	The company shall document and communicate to all employees, contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. high-care or low-risk areas). This shall also include policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, use of canteen and smoking areas).	Y
7.4.2	Protective clothing shall be available that: <ul style="list-style-type: none"> • is provided in sufficient numbers for each employee • is of suitable design to prevent contamination of the product (as a minimum containing no external pockets above the waist or sewn on buttons) • fully contains all scalp hair to prevent product contamination • includes snoods for beards and moustaches where required to prevent product contamination. 	Y
7.4.3	Laundrying of protective clothing shall take place by an approved contracted or in-house laundry using defined and verified criteria to validate the effectiveness of the laundrying process. Washing of workwear by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.	Y

7.4.4	<p>Where protective clothing for high-care or high-risk areas is provided by a contracted laundry, this shall be audited either directly or by a third party, or should have a relevant certification. The laundry must operate procedures which ensure:</p> <ul style="list-style-type: none"> • effective cleaning of the protective clothing • clothes are commercially sterile following the washing and drying process • adequate segregation between dirty and cleaned clothes • cleaned clothes are protected from contamination until delivered to the site, e.g. by the use of covers or bags. 	N/A
7.4.5	<p>If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible), be intact and not shed loose fibres.</p>	Y
7.4.6	<p>Where items of personal protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and sanitised at a frequency based on risk.</p>	Y