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# Audit Report

Global Standard for Food Safety Issue 7: July 2015

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	None		
Justification for exclusion	Not applicable		
Audit Finish Date	2016-01-26		
Re-audit due date	2017-02-04		

Voluntary modules included		
Modules	Result	Details
Choose a module	Choose an item	
Choose a module	Choose an item	

2. Audit Results			
Audit result	Certificated	Audit grade	AA
		Audit type	Announced
Previous audit grade	A	Previous audit date	2015-01-21

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

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### 3. Company details

Address	Laan van Malkenschoten 77 7302 HD Apeldoorn		
Country	The Netherlands	Site Telephone Number	+31 055 5492994
Commercial representative Name		Email	@vionfood.com
Technical representative Name		Email	@vionfood.com

### 4. Company Profile

Plant size (metres square)	No. of employees	No. of HACCP plans	1-3
Subcontracted processes	No		
Other certificates held	ISO9001:2008 (multisite), welfare		
Regions exported to	Europe Asia Oceania Choose a region Choose a region Choose a region		
Company registration number	NL 312		
Major changes since last BRC audit	Approved for production for Chinese market. This is part of the valorisation strategy of Vion Food. Due to project "improvement plan meat" initiated by the dutch authorities, the scalding process is extended. Recently the ceilings in the cutting department are replaced.		
Apeldoorn is pilot plant for the new labelling system within Vion, based at central database, driving the label printers in the production areas. A project to prepare the redesign of the cutting			

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and packaging process is running.

#### 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; employees. The slaughtered pigs are from Dutch or Belgium origin. Also an amount of hams are received from German slaughterhouses of the Vion company. These are cut to specification for the Italian market at Vion Apeldoorn.

Livestock status from the slaughtered pigs is IKB Welfare, IKB or QS (Belgium origin). Purchasing- and transport process from livestock is organised by Vion Farming (HQ Boxtel). Vion Apeldoorn is producing bulk products (in bone, boneless, hanging products, and packed products) for the European and Asian market (China, Japan).

Sales, transport and purchasing processes are centrally organised by the HQ within Vion. Vion Apeldoorn is USA-approved and is allowed to export to Russia and China. EG registration nr is EG 312 NL.

#### 5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category				
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	Ambient high care	No
Justification for area	Production of fresh pork meat which undergo a full cooking prior to consumption.				



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Allergens handled on site

**None**

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Product claims made e.g. IP,  
organic

**None**

Product recalls in last 12 Months

**No**

Products in production at the time  
of the audit

**2-split UDE, ham Pharma snit, middles for bacon production, foots  
and heads for Chinese market,**



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#### 6 Audit Duration Details

On-site duration	16 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	None		
Next audit type selected	Announced		

#### Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2016-01-25	09.00	17.00
2	2016-01-26	08.30	16.45

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

#### Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.9)

Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Plant manager	X		X	X
Production Manager	X	X	X	X
Quality Manager	X	X	X	X
Maintenance manager	X	X		
Manager cutting department	X	X		



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Manager expedition department	x	x		
Manager slaughtering department	x	x		
Facility department	x	x		



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## Non-Conformity Summary Sheet

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

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

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

Minor						
No.	Clause	Details of non-conformity	Correction	Proposed preventive action plan (based on root cause analysis)	Evidence provided document, photograph, visit/other	Date reviewed
1	4.7.2	The scheduled and performed maintenance works are registered in an excel document (to do list maintenance). The list isn't up-to-date, there are tasks recorded as scheduled, which are already done. In	The to-do list is updated and a priority is added for food safety. In procedure P-APD-NL-10.008 (v3) is the working method of the engineering including the priority of scheduling described. Minor is closed; practical	The workflow of the engineering department isn't in control. Vion Apeldoorn has an improvement initiative on the X-matrix to start up a system to	To Do list Project letter P-APD-NL-10.008 (version 17.02.2016)	2016-02-18





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		the planning of work there's no system/guidance about the priority of scheduling related to food safety aspects.	implementation of the proposed action plan will be verified next BRC audit.	control the workflow including priority of scheduling of the engineering department. This system will be realized by a A3 model and implemented before 01-06-2016. See project letter		
2	4.8.6	The hand-washing facility in the scalding area, just after the door to the clean slaughtering area, is broken. No warm water.	Engineering has repaired the hand washing during production and replace the damaged valve.  NC is fully closed	Every day the line manager checks the working of the hand washing, unfortunately not the temperature of the water. The line manager is instructed to control both and is recently part of the SSOP control (P-APD-NL-10.117, v8)).	P-APD-NL-10.117	2016-02-18
3	4.11.5	The follow up of deviations recorded at the pre-SSOP list of the cooling areas (F-ADP-NL-10118) isn't demonstrable for 06-01-2016, 11-01-2016 and 12-01-2016.	Registration of the follow-up of deviation was unclear by employee. Employee is instructed how to do it including the priority. Every deviation of dirt has to follow up immediately (direct contact	All deviations will be discussed in the team huddle and part of the VOS system like all other departments to prevent reoccurrence.	Instruction list Planning list Verification F-APD-NL-10.118	2016-02-18

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			place), the next day (indirect contact place) or planned for periodical cleaning.  Minor NC is fully closed	Records and follow up from SSOP system facility management will be verified every month by QA.		
4	4.15.2	During the site audit part-used primary packaging is found, which wasn't covered suitable in the storage area of packaging materials.	Primary packaging should never bring back from production to packaging storage. The responsible operator has been instructed to follow always the routing of the packaging flow.  Minor NC is fully closed.	The foil for vacuum was damaged and couldn't be used anymore. The operator had to throw it away instead of returning to the packaging storage. Instruction of packaging flow, competence and responsibility is created.	Instruction packaging flow Training records dated 29.01.2016	2016-02-18
5	7.4.1	At the check-in of visitors at the porters lodge an old version of the visitors instructions / house rules (version 2010) was in use. The actual leaflet "welkom bij Vion Apeldoorn" including the new zoning wasn't in use.	The porter has removed the old version of the visitor instructions/house rules immediately. New instruction is provided. See attachment instruction porters.  Minor NC is fully closed.	The leaflet of Apeldoorn is quit new. The instruction of 07-12-2015 was not complete. Only to provide the leaflet to visitors and not to remove the old instructions. In case of new procedures responsible department manager	Instruction porters 'visitors'	2016-02-18



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has to verify the  
implementing.

#### Comments on non-conformities

The company has done a root cause analyses about the 5 minor NC's and has taken appropriate corrective actions. 4 minors NC's are fully closed after the verification of the corrective actions and root cause analyses and defined corrective measurements. 1 minor NC is closed and will be verified at practical implementation of the corrective measurements.

This report will now be subject to technical review, prior to certification authorisation



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## Voluntary Modules Non-Conformity Summary Sheet

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



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



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



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## Detailed Audit Report

### 1. Senior management commitment

#### 1.1 Senior management commitment and continual improvement

Vion Apeldoorn BV is part of the Vion Company, head quarter is located in Boxtel. A clearly quality policy is documented as P-APD-NL-10001 and is demonstrable signed by the plantmanager at 04.01.2016.

The VOS systematic for continuous improvement based at lean management is implemented; the plant in Apeldoorn is pilot plant for the upgrade of the VOS system to VOS level 2. Most important changes are more ownership at shop floor level and more focus for the local MT at structural and long term projects / continuous improvement.

The X-matrix is in use for the definition and monitoring of objectives. For 2016 objectives are: investment in internal logistic/routing of the cutting department, implementing of VSLP with use of improvement of maintenance structure and development of policy for older employees.

Communication is linked to the VOS system: 5x/day team huddles, daily tier1 meetings, weekly tier 2 meetings (trends, MT level), monthly tier 3 meetings (including monitoring progress realisation objectives). The management review is kept at a quarterly base. The HACCP verification is integrated in the management review report. Report last management review is demonstrable discussed in the management team at 19.01.2016. (review Q4 2015)

Review is based at review of KPI's and realisation progress realisation X –matrix.

The company is informed about changes in relevant legislation and technical developments via the QA department of the HQ.

Due date BRC audit is 04.02.2016; so the BRC audit is scheduled on time. The plant manager has attended the opening- and closing meeting.

Outstanding points from the previous BRC audit (2 outstanding minors) are fully closed.

#### 1.2 Organisational structure, responsibilities and management authority

An actual organ chart (P-ADP-NL-10010 version 02.12.2014) is seen. Employees are informed via information boards and internal publications of Vion. The responsibilities, authorities and reporting relationships of all staff members are described in the job descriptions. Responsibilities related to foodsafety and quality aspects are clearly defined.

#### Details of non-applicable clauses with justification

Clause reference	Justification



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## 2 The Food Safety Plan – HACCP

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 corporate level a thorough HACCP analysis (P-VION-10000) is made and available for the sites.

The local process control plan (P-APD-NL-10022 from 19.01.2015, authorised by the plant manager) was developed by the multi-disciplinary HACCP team. The HACCP system has full management commitment and is an integral part of the company's Quality Management System (QMS). The HACCP system is well documented and effective. Prerequisite program (with 42 CP's) assessed. Full product description including microbiological limits and shelf life is in place.

Daily check at CP's is integrated in the SSOP and pre-SSOP check's. Monthly verification by the QA manager.

The local MT is also the HACCP team, the food safety team leader is demonstrable qualified for this role (bachelor level foodtechnology).

The intended use of the product by the customer has been clearly defined. Vion Apeldoorn is producing B-to-B products. No ready-to-eat or consumer products.

Flow diagrams are documented as P-ADP-NL-10014/Procedure flow diagram Vion Apeldoorn including intestine processing. This is verified for the cutting/processing of shoulders (vertical test); no remarks.

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. Records of CCP monitoring and verification show measurements are carried out by authorised persons as planned. This is verified for 17 & 18<sup>th</sup> of November 2015 (vertical test); no remarks.  
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/HACCP reassessment (24.09.2015), Q-base management review including food safety KPI review and periodical report.

No minors reported for this chapter

#### Details of non-applicable clauses with justification

Clause reference	Justification

### 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 7 requirements, which demonstrates the company's commitment to quality and food safety.

#### 3.2 Documentation control

The documented QMS system is organised and distributed to relevant staff via the electronic quality manual named ' '. 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

#### 3.3 Record completion and maintenance

Record verification was part of the vertical audit (Test date 17 & 18 November 2015). All relevant records to the test were found in the archive of records.  
Storage term for quality and foodsafety records is 3 years.



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#### 3.4 Internal audit

Internal audits are coordinated by QA HQ Boxtel. The internal audit plan 2016 isn't published yet. Schedule is based at 1 unannounced and 1 announced internal audit. In 2015 plant Apeldoorn have had 1\* an internal audit, the 2<sup>nd</sup> one was rescheduled to 13.01.2016. The internal audit is demonstrable trained (LRQA, July 2015)).

Audit report 14.01.2016 is verified. Follow up at the 7 minor NC's is demonstrable and effective.

Hygiene inspections are daily (pre-SSOP's and SSOP's); quarterly verification of the cleaning process. Action points related to the pre-SSOP and SSOP are daily discussed in the tier 1 meetings and corrective actions are taken quick and effectively.

#### 3.5 Supplier and raw material approval and performance monitoring

##### 3.5.1 Management of suppliers of raw materials and packaging

The purchase- and delivery/transport process of pigs is the responsibility of Vion Farming, which is located at the HQ of Vion in Boxtel.

Vion Apeldoorn is taken care of the verification of the administrative documents related to the delivery of pigs.

The vertical audit concerns the production of packed at 18.11.2015; slaughtering date 17.09.2015. This product should be produced from livestock origin GB welfare. Livestock status fatterer is verified at the IKB website (Varkenspost.nl); this fatterer is demonstrable recognized for the production of welfare pig in 2015.

The approval and assessment process of suppliers of non-food is centrally organised and managed by the central purchasing department at HQ Vion.

The plant is reporting complaints and gives input for the assessment at a yearly base. Is verified for the plant assessment of supplier (cleaning) and (laboratory) over 2014; no remarks.

##### 3.5.2 Raw material and packaging acceptance and monitoring procedures

Control of administrative documents related to the delivery of livestock. (IKB/UBN nr, origin). Also check at animal welfare aspects.

Incoming packaging products are controlled at quantity, traceability and quality aspects.

##### 3.5.3 Management of suppliers of services

The plant is reporting complaints and gives input for the assessment at a yearly base. Is verified for the plant assessment of supplier (cleaning) and (pestcontrol) over 2015.

##### 3.5.4 Management of outsourced processing and packing

Not applicable, no outsourced processing and packing

#### 3.6 Specifications

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.

Checked as part of the vertical audit for the finished product

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and Meat brackets ( / November 2014).

Specifications are reviewed to ensure they are correct and up to date. Specifications are available for relevant staff (MT).

Due to changes in data management in preparation for the new labelling system a review process to update each specification is running. Coordinated and performed by Vion HQ.

### 3.7 Corrective and preventive actions

The system of lean management / VOS 2.0 is used for the management of corrective and preventive actions.

There are team huddles, 3x shift, with a defined agenda. Daily tier 1 meeting and weekly tier 2 meetings. Escalation model in order to manage a timely corrective action.

In case of the need of an in-depth root cause approach A4 (tier 1 level) and A3 (MT level) forms are in use.

### 3.8 Control of non-conforming products

Non-conforming products / products on hold are physically identified as such. In the expedition area a dedicated corner is seen for returned products from customers and non-conforming products. During the site audit no blocked batches were seen.

The expedition supervisor and production manager are authorised to release a blocked batch. The QA manager is verifying the process at a regular base.

### 3.9 Traceability

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 identification':

- 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 traceable via the first- and last date of use of at batch
- Returned product (destination form).

No consumer packed end products are applicable.

A vertical test was part of the site audit. The product , packed and dispatched at 18.11.2015 was the trial. Slaughterdate was 17.11.2015. Traceability was possible within 4 hours. All relevant documents (dispatch documents, CCP records, livestock information, pre-SSOP, SSOP, pre-shipment, registration of knife management) were all found.

### 3.10 Complaint handling

Complaints are received via the complaints inbox of the I system (complaint registration system of Vion). The QA manager is taken care of a quick response to the complaining customer. Periodic complaint analysis as part of the monthly quality report and the quarterly management review. Stable trend in complaints, last months a slight increase of complaints related to foreign bodies. Recently the ceilings of the cutting areas are replaced. A decrease of foreign bodies is expected the coming months.



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### 3.11 Management of incidents, product withdrawal and product recall

Vion has 3 slaughterhouses. In case of incidents related to business continuity, production volumes are reallocated between the remaining slaughterhouses. For that purpose the SKAL certification (production of bio products) will be maintained.

Vion has a centrally recall protocol: P-VION-10015.

Mock up recalls are kept at a yearly base, the last one at 13 & 14 January 2016 The report of the mock-up recall is seen; in depth report. The objective of this test was to verify the practise of the protocol outside production hours.

In 2015 the company doesn't have had a product recall.

The certification body will be informed in case of a product recall (.described in P-VION-10015)..

### 3.12 Customer focus and communication

The sales department is centrally organised within Vion. No local sales managers.

In case of new customers or dedicated customer demands related to cuts, the local MT is involved to adjust this into specifications

### Details of non-applicable clauses with justification

Clause reference	Justification
------------------	---------------

3.5.4.	No outsourced processes

## 4. Site standards

### 4.1 External standards

The site is located at the industrial estate of Apeldoorn-South. Local activities give no potential risk. A veal slaughterhouse is located at the other side of the road, no direct risks for cross contamination.

External areas are paved and well maintained. The building fabric is also well maintained.

### 4.2 Security

The site is completely surrounded by fencing. There's site security by porter arrangements (2-shifts) and by an external contracted security service during night hours. Controlled entrance for staff in place with badge control on all potential entry points to the plant. Staffs have been trained in site security procedures.



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Registration of visitors is part of the intake procedure at the porter lodge. The site is registered by the Food and Consumer Product Safety Authority (official approval EG 312 NL).  
The security arrangements are yearly reviewed as a part of the reassessment process.

#### 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 and the BRC decision tree all zones are "low risk areas". Site plan assessed and is up-to-date.

No high risk, high care or ambient high care.

Recently a clearly described zoning by colour for the plant is introduced. The plant has 8 zones. Each zone has dedicated instructions about safety aspects (helmet, ear protection, safety boots) and hygiene aspects (for example clothes, snoods, disinfecting of shoes).

The workers of the "dirty" slaughtering department have their own sanitary facilities. Premises are suitable for the intended purpose. Process flow is straight forward and agreed with the Dutch Food Authority. (NVWA)

During the site audit, no building activities were in place.

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

The fabric and internal condition of the site was suitable and satisfactory for the process. Walls, ceilings and floors were generally suitable.

Based at the results of the monthly hygiene audits and daily SSOP checks a continuous maintenance programme is running to maintain the condition of the site. Walls, ceilings and floors were generally suitable. Indoor storage of packaging materials.

The China packaging process is located in the corridor between chilling – and packaging areas. Narrow and limited working space for the workers.

An investment project is prepared for the redesign of this process.

Drainage is sufficient.

Ceilings and overheads are made of cleanable materials.

Tube lights are adequately covered. Condition is controlled daily with SSOP checks.

#### 4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good degree. The water used for cleaning and process is water from mains supply. This has been tested 4 times a year for both microbiological and chemical quality. The samples are analysed by (ISO 17025 accredited laboratory). Water quality is defined as a general control measure. A water distribution plan is available.

The results of the monitoring plan shows a deviation for PCA 22 °C, found in the hand-wash facilities in the scalding area. In conformity with the procedure 3x an extra control is performed. The results are in conformity with legislation now.

#### 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.



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The documentation of the new scalding equipment ( ) is seen. The final acceptance of the equipment will be checked next month.

#### 4.7 Maintenance

Each device and machine has its own logbook, in which all breakdowns and maintenance works are recorded. Is verified for the CO2 stunning equipment ( ) and evisceration equipment in the slaughtering department.

Scheduled maintenance work is listed in an excel file. The maintenance programme is only used for administrative purposes.

The actual list is verified: several scheduled tasks from 2014 are found, which were already finalised in practise (administrative backlog), no system integrated in the excel tool to give priorities to maintenance work related to food safety aspects (for example cross contamination)

A minor NC is raised for this. (nr 01).

Daily team huddle with the technician. Feedback about daily maintenance works and breaks downs in the Tier1 meeting.

Temporary repairs are taken place, but finalised within at least one week.

Hygiene clearance is the responsibility of the supervisors of the production areas.

In order to reduce the contamination with lubricant new transport chains are installed (synthetic) and a new lubricating plan is in preparation. The storage of lubricants is checked; MSDS sheet of lubricant is verified; no issues identified.

#### 4.8 Staff facilities

There are two separate staff facilities (m/w): one for the employees of the dirty 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. Non high risk areas/high 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; tourniquet system.

The factory is totally non-smoking. Smoking is only allowed in a separated area of the rest room. Catering facilities are provided for staff. The canteen has its own HACCP plan and procedures.

During the site audit 1 hand-washing facility (dirty slaughtering area) was found with only cold water. A minor was raised for this. (minor 02)

#### 4.9 Chemical and physical product contamination control

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

Control over cleaning chemicals on site was verified during the site audit.

For Japan/Korea products an intensive product control system is running to check at foreign bodies (for example bone, plastic, paper). This is a visual inspection.

##### 4.9.1 Chemical control



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Separate storage facility for cleaning chemicals in place (container). The storage was locked during the site audit. Authorised access by production department and cleaning contractor. MSDS available and specifications confirm suitability for use in food processing industries. MSDS sheet of brusspray is verified; no remarks.

#### 4.9.2 Metal control

The HACCP study has determined that metal detection is not necessary a 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 (machine / knife intactness / counting numbered sets) in relation to the hazard analysis. Registration and corrective actions could be demonstrated. A knife handling policy is in place. Records of knife counting at 17 & 18 November 2015 are seen (vertical test).

#### 4.9.3 Glass, brittle plastic, ceramics and similar materials

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. This is verified for the tube lights in the storage area of work clothes, this area is listed at the actual glass register. Glass / hard plastic audits are regularly carried out: by production department (daily pre-SSOP and SSOP) and by QA (reduced check: 1 x / month for open product situations –and full inspection: 4 x / year). Records of breakage and corrective actions are listed.

#### 4.9.4 Products packed into glass or other brittle containers

No use of glass or other brittle containers as packaging material

#### 4.9.5 Wood

Wooden pallets are not permitted in production areas.

#### 4.10 Foreign-body detection and removal equipment

##### 4.10.1 Foreign-body detection and removal equipment

Foreign body alertness has the attention of all people dealing with products. Metal detection device (CP) is applied for tongues. During the site audit no tongues were packed. Records of the control of the metal detector were seen.

No consumer packed end products are applicable.

##### 4.10.2 Filters and sieves

No use of filters or sieves in this plant.

##### 4.10.3 Metal detectors and X-ray equipment

The used metal detector is based at a belt stop system.

Check at performance before and after the packaging process of tongues.

##### 4.10.4 Magnets

No use of magnets in this plant

##### 4.10.5 Optical sorting equipment

No use of optical sorting equipment in this plant.



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

No use of container cleanliness equipment.

#### 4.11 Housekeeping and hygiene

The company has a contracted specialised cleaning company for the daily cleaning and disinfection of the plant. The cleaning schedule is seen. 1\* week the plant is disinfected with a disinfectants at chloride base to prevent resistance.

Periodic cleaning is scheduled 2x/year; is verified for the cleaning of the corridor between chilled storage carcasses and cutting line > 3m and this was demonstrable.

Daily check at visual quality of cleaning in the pre-SSOP controls. Records are seen from 17.11.2015 and 18.11.2015(vertical audit). Corrective actions are clearly defined and timely handled.

Weekly control at disinfection process by agar checks. Results 2015 are verified. Incidental higher values, but overall good results. Residue checks are done at a 2-weekly base.

Results of agar checks are reported periodically and as a KPI in the Q-base management review.

During the verification of the pre-SSOP records of the chilled area, it was noticed corrective actions were demonstrable in all recorded deviations. In January 2016 already 3x a deviation recorded and no corrective action demonstrable (minor 03).

#### 4.11.7 Cleaning in place (CIP)

The company has a tank for the storage of human blood. There's a CIP cleaning at this tank. The tank is owned by the customer of the human blood ( ), the CIP process is not the responsibility of Vion Apeldoorn and not a part of the scope of the BRC audit.

#### 4.12 Waste / waste disposal

During the site audit a 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.

#### 4.13 Management of surplus food and products for animal feed

NA, in conformity with the legislation it's not allowed to give surplus food an animal feed destination.

#### 4.14 Pest Control

The company has a contract with a specialised pest control company. Inspection frequency 8\*/year; in depth audit 1\*/year.

Internal activity of mice (canteen, technical areas, not in chilled areas). In 2015 several actions have taken place to improve the condition of the building and good house keeping related to the pest control programme. A long list with improvements and recommendations reported by the pest control company is followed.

Due to the new legislation about the use of pest control products (chemicals) the outside terrain is more sensitive for activity of mice.





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The location of baits at the site plan is verified for SEN 527 and SEN 255, both are located in conformity with the plan.

The training of the pest control inspector, is verified, he's demonstrable qualified until 01.07.2019.

The MSDS sheet of the used non-tox blocks at the outside premises is verified and this is an approved block according the new legislation aspects.

The trend report 2015 is integrated in the HACCP reassessment report.

#### 4.15 Storage facilities

The plant has the possibility for internal storage in chilled storage area (chilled or frozen).

General handling procedure and temperature control (with automatic temperature monitoring and alarm system) is applicable during storage and loading of raw materials and final products. Temperature of storage areas of carcasses (chilling nr 4) is verified for 17 & 18 November 2015 (vertical audit).

Temperature was < 3 °C.

No outside storage of raw materials or final products applicable, only from technical materials.

Stock rotation based at FIFO.

Segregated storage of primary packaging materials. During the site audit it was noticed part-used primary packaging materials was stored without effective protection in the storage area of primary packaging materials (minor 04).

#### 4.16 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 bags. Only use of approved transport companies. 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 ( ) by transport audits. In 2015 8 transport audits are kept. Is verified for report 15.04.2015 and report 01.09.2015; both report shows good results. Both transport companies are contracted by foreign sales offices of Vion. There are temporary approved, the formal approval via questionnaires / certificates is in progress and is coordinated by the central QA department of Vion.

Dispatch process is verified for 18.11.2015; the dispatch of the (vertical test).

CCP checks and preshipment procedures are followed demonstrable; records are seen.

#### Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5., 4.3.6., 4.3.7., 4.4.4., 4.4.13, 4.8.4., 4.8.5.	No high-risk, high care or ambient high care based upon appendix 2 risk zone decision tree
4.9.2.	No use of strongly scented or tain-forming materials



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4.9.4.	No products packed into glass or other brittle containers
4.10.2	No use of filters and sieves
4.10.3.	No use of metal detectors
4.10.4.	No use of magnets
4.10.5	No use of optical sorting equipment
4.10.6	No use of container cleanliness equipment
4.11.7	No CIP cleaning
4.13	No production of animal feed

## 5. Product control

### 5.1 Product design/development

No product design /development activities are taken place at this site. No production of consumer products. At corporate level a development procedure is available. Systematic HACCP analysis and food safety assessment is integrated in the process of developing new products or modifying existing products. In 2015 a system is installed for the selection of the flow of pork carcasses from the chilled areas to the cutting lines. In 2016 this will be linked to the autoform selection equipment in the slaughtering department. 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 central procedure 'Houdbaarheidsonderzoeken'. Results are published in quality trends. No claims labelled.

### 5.2 Product labelling

Vion Apeldoorn BV is producing single meat products. Labelling aspects are production date and land of origin. This verified for the labelling of products, produced at 18.11.2015 (vertical test). For products, based at Belgium pork, the text born in Belgium is in use, the same situation is suitable for the ham products from German origin.

### 5.3 Management of allergens

Not applicable, the company is only producing fresh meat. No allergens used or present at the site.



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#### 5.4 Product authenticity, claims and chain of custody

The company has 2 product integrity lines: Welfare and QS. In case of a main breakdown in the site of Vion in Groenlo, Vion Apeldoorn BV is the back-up location for the slaughtering of bio pigs. The company has a SKAL recognition for this purpose.

In December 2015 the company is audited against the requirements of the chain-of-custody. This is a certification standard related to product integrity of sustainable meat.

Daily and weekly check at mass balance.

The audit is audited against the chain-of-custody requirements (Dutch standard) and approved.

#### 5.5 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 and origin of the livestock (GB, Welfare, QS). Based upon sampling packaging materials specifications reveal food safe declaration, e.g. Regulation 1935/2004/EC. Packaging of products from vertical audit checked (Meat brackets) assessed including declaration of conformity.

#### 5.6 Product inspection and laboratory testing

##### 5.6.1 Product inspection and testing

All microbiological analyses are outsourced to a contracted ISO17025 recognised laboratory ( ). Shelf life tests are taken place, but this is coordinated by the central QA department in Boxtel. Daily samples at carcasses (PCA, entero's) and weekly check at several pathogens (Salmonella, Listeria). Reports of result in Quality Trend. Listeria results were good until November 2015. The new ceilings in the cutting areas are installed and the ventilation system to dry the ceilings after cleaning is programmed to reduce the RH during processing. No Listeria is found in 2016 yet.

##### 5.6.2 Laboratory testing

All microbiological analyses are carried out by the contracted external laboratory  
Laboratory

#### 5.7 Product release

Product release is based upon product temperature measurements (CCP) before dispatch as part of the preshipment procedure. 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; good organised. No positive release systems in place. Only authorised personnel (QA manager / production manager) are allowed to release non-conforming products. Product release is done by the QA Manager / Plant Manager / departmental manager.

#### Details of non-applicable clauses with justification

Clause reference	Justification
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5.2.3.	No products with claims
5.2.4.	No use of labels, prescribed by customers
5.3.	No allergens on site

## 6. Process control

### 6.1 Control of operations

The site clearly demonstrated a good control of operations. Process conditions and methods are well checked. Systematic monitoring is demonstrated. Is verified for the daily SSOP checks of the process in the dirty slaughtering department. Process checks done at animal welfare aspects, stunning (CO<sub>2</sub>), scalding and killing. Standards are defined in document process check dirty slaughtering. No deviations seen.

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. The main change over moment in the process is the startup of the process in the morning. This is controlled via the pre-SSOP systematic (cleaning, sterilizers, glass, maintenance checks). Good organized, no deviations seen during the audit.

### 6.2 Labelling and pack control

The used procedures to control labelling and pack control are documented as P-ADP-NL-10181 vs 23.01.2016.

For the Japan, Korea and China product the 1<sup>st</sup> and last used label of a batch is stucked on a recording form to control the use of the right label. Recently the new central controlled label system is put into service. Vion Apeldoorn is pilot plant for this new system. is based at a central managed data base with label information (a cloud), which is linked to the label equipment in the packaging lines. The label equipment in the packaging areas is operating via touch screens, which seemed to be user friendly.

### 6.3 Quantity, weight, volume and number control

All products are sold and invoiced by actual weight. 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. Is verified for the weigh bridge (calibrated at 09.12.2015) and balance 17 (weighing of China products, calibrated at 09.09.2015).

### 6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated. Critical measuring equipment is thermometers (CCP related) and weighing scales. Calibration with 2-monthly frequency



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(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; no remarks.

#### Details of non-applicable clauses with justification

Clause reference	Justification
6.2.4.	No use of in line vision equipment

## 7. Personnel

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

New (temporary) workers are trained and instructed before they start working. There's an instruction film in several languages for this purpose. Records of this introduction training are verified for temporary worker (06.01.2016) Effectiveness of training is verified by the use of questionnaires.

Refresher training is organised at a regular base. Seen for (18.06.2014) and (15.09.2015).

Employees, taken care for CCP controles, are demonstrable trained. Verified for (CCP 1 at 18.06.2014) and (CCP 2,3,4) at 13.06.2014

Animal welfare training (employee stable) at 01.11.2013.

The yearly permit to use the shooting mask in the stable for and is verified.

All sampled training records and permits were demonstrable.

### 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 are also part of the housekeeping instructions inside Vion.

The wearing of jewellery isn't allowed.

### 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.



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#### 7.4 Protective clothing: employees or visitors to production areas

All employees (including temporary workers and visitors) are wearing protective clothing (inclusive work shoes). Protective clothing includes white or blue trousers, jackets and rubber boots / shoes. Disposable hairnets are applied, all hair is enclosed. Disposable gloves are 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. There are sufficient facilities to clean shoe soles, gloves and knives.

During the check-inn at the porters lodge it was noticed the previous version of the house rules (version 2010) was in use for the instruction of visitors. (minor 05)

#### Details of non-applicable clauses with justification

Clause reference	Justification



## Module 8 - Traded Goods

### Scope

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

### 8.2 Specifications

### 8.3 Product inspection and laboratory testing

### 8.4 Product legality



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### 8.5 Traceability



## Module 9: Management of Food Materials for Animal Feed

### Scope

#### 9.1 Management Commitment

#### 9.2 HACCP

#### 9.3 Outsourced Production

#### 9.4 Specifications





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#### 9.5 Traceability

#### 9.6 Chemical and Physical Product Contamination Control

#### 9.7 Labelling

#### 9.8 Training



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