

# Audit Report

Global Standard for Food Safety Issue 6: July 2011

1. Audit Summary			
Company name	<b>Vion Food Group</b>	BRC Site Code	<b>9714502</b>
Site name	<b>Encebe Vleeswaren BV</b>		
Scope of audit	<b>Producing (cutting, slicing, mincing, blending, fermentising, pasteurising, sterilising, marinating) and packing (modified atmosphere, chilled, frozen, canned) of meat products of beef, pork and poultry in consumer and bulk packaging.</b>		
Exclusions from scope	<b>None</b>		
Audit Finish Date	<b>2014-05-20</b>		

2. Results					
Audit result	<b>Certificated</b>	Audit grade	<b>B</b>	Audit type	<b>Announced</b>
Audit frequency	<b>12 months</b>	Re-audit due date	<b>2015-06-12</b>		
Previous audit grade	<b>A</b>	Previous audit date	<b>2013-06-04</b>		

Number of Non-Conformities	Fundamental	<b>0</b>
	Critical	<b>0</b>
	Major	<b>0</b>
	Minor	<b>11</b>

3. Company Details		
Address	<b>Boseind 10, 5281 RM Boxtel</b>	
Country	<b>The Netherlands</b>	Telephone
Commercial representative Name		Email
Technical representative		Email

LRQA Ltd Hiramford, Middlemarch Business Park, Siskin Drive, Coventry, CV3 4FJ

Name

#### 4. Company Profile

Plant size (metres square)	<b>9825</b>	No. of employees	No. of HACCP plans	<b>1</b>
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Subcontracted processes	<b>No</b>
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Other certificates held	<b>ISO 9001, Skal, Good Farming Star</b>
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Regions exported to	<b>Europe</b> Choose a region Choose a region Choose a region Choose a region Choose a region
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Major changes since last BRC audit	<b>Starting with Gammon products for the English market</b>
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#### Company Description

Encebe Vleeswaren BV is a middle-sized producer of meats and sausages and is part of the Vion Food group, which is the biggest producer of meat in Western Europe. The company is located in Boxtel at the same location as the slaughterhouse of Vion Boxtel. Encebe Vleeswaren BV has employees in a one shift operation (excepting smoking and slicing department: 2 shifts). Only a small part of them is working at a temporary base.

The company is producing and selling different final products divided into several product groups of meats and sausages: cooked sausages, sterilised products and fermented sausages. Most of the products are produced by the own production process. Additionally purchased product (poultry) sliced and packed in a special department. The production quantity is approximately per week. The company is also producing an assortment of products based on organic raw materials (SKAL-certificated). The company is certificated for Good Farming Star and ISO 9001 as part of a multi site ISO system.

Main selling market is the industrial market and a minor part at the retail (supermarkets). The strategy is focused at growth in the industrial market, for which an assortment tailor-made product is produced, and growth in the retail market of sliced ready to eat meat products. The company stopped with the production of meat preparations. The scope is adapted.

At the end of 2013 the company was involved in a organic meat scandal. A batch of 11 ton regular pork meat was sold in 2012 as organic. After several investigations conducted it can be concluded that it was an incident.

Official approval EG-61-NL of the Food and Consumer Product Safety Authority

#### 5. Product Characteristics

Product categories	<b>08 - Cooked meat/fish products</b> <b>09 - Raw cured or fermented meat and fish</b> Category Category
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Finished product safety rationale	<b>Short shelf life, presence of preservatives, packed at modified atmosphere or vacuum, cooked, chilled, frozen, hermetically closed casing or vacuum packaging or canned.</b>		
High care	<b>Yes</b>	High risk	<b>No</b>
Allergens handled on site	<b>Mustard, celery, gluten, milk, corn, coriander and soya</b>		
Product claims made e.g. IP organic	<b>Organic, gluten free, non GMO (maize, soya), Good Farming Star</b>		
Product recalls in last 12 Months	<b>No</b>		
Products in production at the time of the audit	<b>Originele katenspek en                      Katenspek productie datum 20-05-2014, Oven gebakken ham art. Nr 320360,                      Ardenner boterhamworst 20-05-2014,                      Kochschinken, Boerenmetworst gsl FP</b>		



6.Audit Duration Details			
On-site duration	<b>19 man hours</b>	Duration of production facility inspection	<b>10 man hours</b>
Reasons for deviation from typical or expected audit duration	<b>Complex organisation, lot of different production department with there own processing methods and type of products, audit time is to short</b>		
Next audit type selected	<b>Announced</b>		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
<b>1 (start date)</b>	<b>2014-05-19</b>	<b>09:00</b>	<b>18:00</b>
<b>2</b>	<b>2014-05-20</b>	<b>08:00</b>	<b>18:00</b>

7.Key Personnel		
Auditor Number	Auditor Names and roles	Lead Auditor

Present at audit				
<b>Note: the most senior operations manager on site should be listed first and be present at both opening &amp; closing meetings (ref. clause 1.1.9)</b>				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
<b>General Manager</b>	X		X	
<b>Financial Controller</b>				X
<b>Quality Manager</b>	X	X	X	X
<b>Quality Assurance Assistant</b>	X	X	X	X
<b>/ Chief Production Department 1</b>	X	X		
<b>/ Chief Production Department 2</b>	X	X		
<b>/ Service Bureau</b>	X			
<b>Foreman Smoking Department</b>		X		



Employee Curing Department		X		
/ Expedition Bulk		X		
New Product Development			X	
Packing Department		X		
Industrial Department		X		



**GLOBAL STANDARD**  
FOR FOOD SAFETY



Lloyd's Register  
LRQA

**Critical or Major Non Conformities Against Fundamental Requirements**

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

**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	Reviewed by

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	Reviewed by
1	2.7.1	The potential hazards that are reasonably can be expected to occur at the (direct) burning or high temperature (air) heating proces steps are not identified and analyzed in "Procesbeheersplan". These proces steps are missing in HACCP study.	We added the process step burning or high temperature (air) heating to the procesbeheersplan. Than it is clearly, that this is part of the HACCP study. Minor can be closed. Verification is part of the	The hazards of PA are mentioned in the Hazard analysis. But not in the Risk assessment due to the fact that there are no standard of the acceptable levels.	Adapted "Procesbeheersplan" and control measures are defined	2014-06-14	



			next audit				
2	2.10.2	Verification of the correct measurement of CCP 3 (pH after fermentation) is based on a 2 weekly control measurement. Last verification is conducted on the 4 <sup>th</sup> of July 2013.	We are already performing the verification. And adjusted the monitoring form that the verification can be carried out at the same document.  Minor can be fully closed	The verification was performed by the former Qualitymanager, this was not passed on.	Adapted form "Fermentatiecontrole CCP3" and a verification conducted on the 30-05-2014	2014-06-14	
3	3.2.1	For the blockade registrations of non conforming and returned products there are two different documents, release 5 dd 11-05-2014 and release 6 dd 24-06-2013 in use. In the release 5th version the temperature of the returned products are not noted. There is no correct working system for the replacement of existing documents when these are updated.	This old copy is destroyed. We instructed our staff members to print only original copy straight from the digital quality manual. And fill them by hand. Therefore the correct forms will be used, and the system is working correct.  Minor can be fully closed	There was still an old copy, on a PC. This was still used to fill it digital and printing on red paper. All old paper copy's where collected at the last replacing.	A filled in new correct form dd 04-06-2014	2014-06-14	
4	3.8.1	At the raw material storage was a pallet found with incurant raw materials. Some of this raw materials had passed the expiry date. There was no clear identification (f.e. labelling) and registration/report (blockade form) of this non-conforming product available	Raw materials with the extended expire date are labelled. Which is documented at the filled out forms F-NCB-NL-10038 in the file map Vrijgave hulpstoffen at the QA office and at the material. The materials with past expiry date without extension, are	If The expiry data is passed we can extend this after consulting the supplier and / or after microbiological tests We mark the products which are still in use. But we failed to label the materials past expiry date without extension.	Blockade of products with a passed expiry date and an example of a filled in form "Vrijgave product en hulpstof met aangepaste THT" dd 23-04-2014	2014-06-14	





			labelled with blockade forms. Minor can be closed. Verification is part of the next audit			
5	4.6.2	There is no declaration or statement of compliance for the elevator belt available on the new Gammon production line whether this belt is suitable for food contact and meets the legal requirements. It is the vertical conveyor belt with the remarkable colour after the brine injection equipment.	Because the sister firm is closed, we claimed the documentation from the producers of the belt and the machine. We also instructed our maintenance staff to claim the documentation of all purchased equipment, from the supplier. Minor can be fully closed	We received this machine with belt from our sister firm. However the documentation was not enclosed.	Declaration of compliance of the belt dd 14-05-2008 and machine dd 21-05-2014	2014-06-14
6	4.10.3.1	Based on the company own risk assessment foreign body protection must be conducted by metall detection. For one product katenspek 1,6 kg" was seen that no metall detection was applied. In the supplier questionnaire, filled in for this customer is was not mentioned by the company that metall detection for this product is not in use.	We adjusted the risk assessment. We will perform all control measurements to prevent metal in all our products. We will continue metal detection at the consumer packing. Minor can be fully closed	katenspek 1,6 kg is not consumer packing. Products for further processing should be metal detected at the last processing. This was not stated in the Procesbeersplan.	Adapted "Procesbeersplan" and control measures are defined	2014-06-14
7	5.1.5	There shall be a process to verify that ingredient and allergen labelling is correct	The wrong labels are destroyed and new correct labels are printed.	The label of Encebe orginele katenspek was homemade by the	Adapted labels and form "Controle stickers" dd 1-05-2014	2014-06-14



		based on the product recipe. For a product "katenspek" two different labels (Encebe originele katenspek) with a different ingredient declaration was in use. For both labels applies that there is one recipe.	Also a check is performed before the homemade labels are used.  Minor can be closed. Verification is part of the next audit	magazijn. For this batch the wrong declaration was chosen. This was not checked.		
8	5.2.4	At the raw material storage some ingredients are weighed out in smaller parts. Measures are only taken to prevent cross contamination by weighing out of mustard seed containing ingredients. There are no preventive measures taken for other allergens like gluten in other ingredients (Ham Glaze) which are also weighed. The used list of allergen at this department is not complete	We adjusted the procedure Ontvangst en afwegen grondstoffen /hulpstoffen (P-NCB- NL-10094). To perform the measures always when weighing out ingredients. We will also adjust the form Hulpstoffen (F-NCB- NL-10196) and add a Column Allergens.  Minor can be closed. Verification is part of the next audit	We already performed measures to prevent cross contamination. But it was not stated to perform this always when weighing out ingredients. A list of all ingredients is available but which carry allergens is not mentioned.	Adapted procedure "Allergenen" and "Hulpstoffen"	2014-06-14
9	5.4.1	There are no specifications available for the (orange - 00ZA000678, blue- 00ZA000081, and dark blue- 00ZA000679) different used crate bags on the industrial department (frozen product). Secondly, the statement of compliance concerning this bags (including migration test), provided by	We asked for additional information from the suppliers. These specifications are available now and recorded in the new specifications summary. In the specification of van der windt is stated diepvrieszakken and in de specifications of	We were busy with claiming the latest specifications from the suppliers. These specifications where not complete and not yet recorded in the new specifications summary. We accidentally showed the wrong specification of normal crate bags.	Specification from dd 10-06-2014 and dd 10-04-2014	2014-06-14



		<p>and are showed by the company is only applicable for foils using at ambient temperature. Other applications and in the situation of the company which used this bags for a frozen product it is explicitly excluded by the supplier.</p>	<p>is stated the use at -18 degrees. Minor can be fully closed</p>			
<p>10 6.1.2</p>	<p>Before (vacuum) packing of meat products a temperature check must be conducted by the operator. The by the operator recorded temperature checks were controlled by doing a second measurement at the same product. There was a big difference between the recorded temperature and the secondly measured temperature which can not be explained by the time difference and it heating up scenario.</p>	<p>We reinstructed the staff that always the measured temperature must be recorded. And if the temperature is deviant this should be recorded and also the corrective actions. Minor can be closed. Verification is part of the next audit</p>	<p>For this product can be the temperature can be higher than the others, because otherwise it can't be handled. It seems that the desirable temperature was recorded.</p>	<p>Attendance list instruction "Temperatuurcontrole en registratie" dd 04-06-2014</p>	<p>2014-06-14</p>	
<p>11 6.3.2</p>	<p>A logger is used for calibration of the temperature measuring device at the pasteurisation and sterilisation equipment. The company could not show any records if this logger was recently (within a year) calibrated.</p>	<p>We calibrated the logger and added it to the calibration plan. Minor can be fully closed</p>	<p>This logger was not recorded in the calibration plan.</p>	<p>Calibration report Thermometer dd 04-06-2014</p>	<p>2014-06-14</p>	



## 1. Senior Management Commitment

### 1.1 Senior management commitment and continual improvement

The by \_\_\_\_\_, General Manager, signed Management Review of September 2013 shows a good working Quality Management System. At the end of 2013 a new General Manager, \_\_\_\_\_ and QA Manager \_\_\_\_\_ started at the company.

Clear objectives are part of the MR, concerning quality, hygiene and complaints. They are monitored monthly. Complaints increased. Several improvements projects (f.e. A3 verbeterplan foreign bodys) are started in response of the appointed actions in the MR.

Through the stated objectives and during the evaluation, it is demonstrated that the senior management commits itself to the quality management system. The commitment of the general management is also demonstrated by the membership of the HACCP team (chairman).

The management team showed commitment to the QMS which is also evident in the systematic for continuous improvement, e.g. PDCA cycle of the multi-site ISO 9001:2008 approval.

New initiatives are taken to restart the white board meetings.

The company demonstrated a system which is maintained and compliant with the process controls and is effective in meeting customer, process and product measures. There was no evidence that a lack of resources had substantially affected the running of the QMS. The company demonstrated an effective system.

The yearly scheduled MR (2012/2013) was carried out September 2013. The MR is discussed and accepted by the MT meeting on the 30<sup>th</sup> of August 2013. The MR contains the relevant review subjects (objectives, complaints, verification and validation of the management system, ccp control, PRP control)

There is an organisation with short communication lines (effective) and a direct control of the production by the management. Communication (Procedure Overlegstructure P-NCP-NL-10006 v7) is conducted by:

- White board communication; concerning quality issues
- MT-meeting once per week; minutes 30-08-2013 concerning QMS and specific MR 2012/2013 seen
- HACCP team meetings once per 4 weeks; minutes seen

At the end of 2013 the company was involved in a organic meat scandal. A batch of 11 ton regular pork meat was sold in 2012 as organic. After several investigations conducted it can be concluded that it was an incident. The company has taken several measure to ensure that re occurrence is not possible any longer. As a follow up an additional BRC audit was carried out in january and february 2014. All appointed action points can be fully closed now. Assessed and discussed "Procedure Product Proces Integrity Encebe" rv 1

The General Manager attends the opening meeting and and the Financial Manager was in his place for attending the closing meeting of the audit. All intensions were discussed during the opening meeting with the General Manager

Root causes of the 6 minor non-conformities of the last BRC audit have been identified. The NC's did not

reoccur.		
Requirement No	REQUIREMENT	Conforms
<b>FUNDAMENTAL</b> 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: <ul style="list-style-type: none"> <li>signed by the person with overall responsibility for the site</li> <li>communicated to all staff.</li> </ul>	Y
1.1.2	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: <ul style="list-style-type: none"> <li>documented and include targets or clear measures of success</li> <li>clearly communicated to relevant staff</li> <li>monitored and results reported at least quarterly to site senior management.</li> </ul>	Y
1.1.3	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: <ul style="list-style-type: none"> <li>previous management review action plans and time frames</li> <li>results of internal, second party and/or third party audits</li> <li>customer complaints and results of any customer performance reviews</li> <li>incidents, corrective actions, out of specification results and non-conforming materials</li> <li>review of the management of the HACCP system</li> <li>resource requirements.</li> </ul> <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	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.	Y





1.1.5		The company's senior management shall provide the human 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.	Y
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.	Y
1.2	<b>Organisational structure, responsibilities and management authority</b>		
The organisational structure (from 13-01-2014) is clear and part of the QMS. The various production departments directly report to one of both chiefs production. They report to the production leader and her for his part reports to the general manager. The QA manager informs the general manager concerning food safety issues, complaints and results of internal auditing. The responsibilities, authorities and reporting relationships of all staff members are described in the job descriptions.			
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 the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	Y
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

Based on the principles of the Codex Alimentations, in a manual a complete system has been documented and implemented in practice. At VION Food NL level a thorough HACCP analysis (P-VION-10000) is made and available for the sites. The local HACCP system (P-NCB-NL-10027 was developed by a multi-disciplinary team. There is a multi-disciplinary team installed (General Manager, QA Manager, Quality Assurance Assistant, Chief Production Department Encebe 1, Chief Production Department Encebe 2, Chef Technical Department) available with right experience and knowledge. Report of yearly verification discussed by the HACCP team and seen:

- Re-assessment HACCP system 2012/2013 minutes HACCP meeting dd 21-01-2014

Flow diagrams are prepared and available in Quality on-line. All process steps were shown

Assessed:

- Flow chart "Processen Encebe Vleeswaren (P-NCB-NL-10190)
- Flow chart main proces "Korte flow" dd 10-04-2014
- Flow diagram "Gammon Joint Production"

A good detailed lay out was shown in the manual as well as process flows. Employee, Raw materials, Product and waste flow are determined on the lay out. Assessed:

- Lay-out High Care 2006 (including sewer plan)
- Lay out walking routes Low risk and High Care

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. Full product description including microbiological limits and shelf life is in place. The intended use (B to B/Consumer Products) of the product by the customer has been clearly defined

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. Assessed:

- Procedure Procesbeheersplan Encebe Vleeswaren (P-NCB-NL-10027 dd 16-05-2013)
- Samenvatting Allergenen en CCP's
- P-Food-10013
- P-NCB-NL-10029 HACCP

CCP's which are determined, including critical limits, according to P-NCB-NL-10027 dd 16-05-2013:

- CCP 1. Temperature control of (returned) fresh pork meat / beef at reception (<7°C)
- CCP 2. Temperature control of (returned) animal by-products at reception (<3°C)
- CCP 3. pH after fermentation proces (pH<5,3 within 84 hours)
- CCP 4. Temperature control of heat treated meat products pasteurization (P70>3 minutes)
- CCP 5. Temperature control of heat treated meat products sterilization (2,45 hours at 106°C)
- CCP 7. Cooking (P70> 3 minutes)

Corrective actions are clearly defined according to the CCP overview. Yearly verification report CCP dd 21-01-2014 seen; oké The CCP's were demonstrated, including a well recording during the audit, including corrective actions. Verification during the year is demonstrable. Several reports seen

Validation assessed:

- Validation report "werkwijze Gammon Joints VION Encebe" dd 03-10-2013

HACCP team minutes dd 29-04-2014, 11-02-2014 and 21-01-2014 seen.



<p><b>Minor 2.7.1</b> The potential hazards that are reasonably can be expected to occur at the (direct) burning or high temperature (air) heating proces steps are not identified and analyzed in "Procesbeheersplan dd 07-05-2014".</p> <p><b>Minor 2.10.2</b> Verification of the correct measurement of CCP 3 (pH after fermentation) is based one a 2 weekly control measurement. Last verification is conducted on the 4<sup>th</sup> of July 2013.</p>		
<p><b>2.1</b> The HACCP food safety team - Codex Alimentarius Step 1</p>		
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>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 safety system shall remain the responsibility of the company.</p>	Y
<p><b>2.2</b> Prerequisite programmes</p>		
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"> <li>• cleaning and sanitising</li> <li>• pest control</li> <li>• maintenance programmes for equipment and buildings</li> <li>• personal hygiene requirements</li> <li>• staff training</li> <li>• purchasing</li> <li>• transportation arrangements</li> <li>• processes to prevent cross-contamination</li> <li>• allergen controls.</li> </ul> <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
<p><b>2.3</b> Describe the product - Codex Alimentarius Step 2</p>		
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>	Y

	<ul style="list-style-type: none"> <li>composition, e.g. raw materials, ingredients, allergens, recipe</li> <li>origin of ingredients</li> <li>physical or chemical properties that impact food safety, e.g. pH, aw</li> <li>treatment and processing, e.g. cooking, cooling</li> <li>packaging system, e.g. modified atmosphere, vacuum</li> <li>storage and distribution conditions, e.g. chilled, ambient</li> <li>target safe shelf life under prescribed storage and usage conditions</li> <li>instructions for use, and potential for known customer misuse, e.g. storage, preparation.</li> </ul>	
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"> <li>the latest scientific literature</li> <li>historical and known hazards associated with specific food products</li> <li>relevant codes of practice</li> <li>recognised guidelines</li> <li>food safety legislation relevant for the production and sale of products</li> <li>customer requirements</li> </ul>	Y
2.4	Identify intended use - Codex Alimentarius Step 3	
2.4.1	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).	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"> <li>plan of premises and equipment layout</li> <li>raw materials including introduction of utilities and other contact materials, e.g. water, packaging</li> <li>sequence and interaction of all process steps</li> <li>outsourced processes and subcontracted work</li> <li>process parameters</li> <li>potential for process delay</li> <li>rework and recycling</li> <li>low/high-care/high-risk area segregation</li> <li>finished products, intermediate/semi-processed products, by-products and waste.</li> </ul>	Y
2.6	Verify flow diagram - Codex Alimentarius Step 5	
2.6.1	The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations	Y



	shall be considered and evaluated. Records of verified flow diagrams shall be maintained.	
<b>2.7</b>	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.	N
2.7.2	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: <ul style="list-style-type: none"> <li>• likely occurrence of hazard</li> <li>• severity of the effects on consumer safety</li> <li>• vulnerability of those exposed</li> <li>• survival and multiplication of micro-organisms of specific concern to the product</li> <li>• presence or production of toxins, chemicals or foreign bodies</li> <li>• contamination of raw materials, intermediate/semi-processed product, or finished product.</li> </ul> Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.	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
<b>2.8</b>	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 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.	Y
<b>2.9</b>	Establish critical limits for each CCP - Codex Alimentarius Step 8, Principle 3	
2.9.1	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:	Y



	<ul style="list-style-type: none"> <li>measurable wherever possible, e.g. time, temperature, pH</li> <li>supported by clear guidance or examples where measures are subjective, e.g.</li> <li>photographs</li> </ul>	
2.9.2	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.	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"> <li>online measurement</li> <li>offlinemeasurement</li> <li>continuous measurement, e.g.</li> <li>thermographs, pH meters etc.</li> <li>where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.</li> </ul>	Y
2.10.2	Records associated with the monitoring of each CCP shall 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.	N
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"> <li>internal audits</li> <li>review of records where acceptable limits have been exceeded</li> <li>review of complaints by enforcement authorities or customers</li> <li>review of incidents of product withdrawal or recall.</li> </ul>	Y



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

### 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 state 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 (P-NCB-NL-10007) 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.

The procedure for quality records (P-NCB-10011) defines how long records are maintained, how they are reviewed and where they are stored / archived. Most records are hand written. All documents are kept for at least THT + 12 months. Longest shelf-life is 15 months (sterilized products). All electronic data are secured by daily back-ups. Assessed:

- > "Inpak overzicht" dd 20-12-2012 and Organogram dd 03-05-2013 (archived document)
- > "Register van wijzigingen" up date 01-04-2014

Minor 3.2.1

For the blockade registrations of non conforming and returned products there are two different documents, release 5 dd 11-05-2014 and release 6 dd 24-06-2013 in use.		
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
<b>3.2</b> Documentation control		
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	The company shall have a procedure to manage documents which form part of the food safety and quality system. This shall include: <ul style="list-style-type: none"> <li>• a list of all controlled documents indicating the latest version number</li> <li>• the method for the identification and authorisation of controlled documents</li> <li>• a record of the reason for any changes or amendments to documents</li> <li>• the system for the replacement of existing documents when these are updated.</li> </ul>	N
<b>3.3</b> Record completion and maintenance		
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 retained for the shelf life of the product plus 12 months.	Y
<b>3.4</b> Internal audit		
There are detailed schedules of internal audit against documented procedures, carried out by trained		

<p>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. The audits have been carried out close to schedule and corrective action has mostly been taken in a timely manner. The company started with unannounced audits. In addition, hygiene audits and site / building inspections are performed at monthly intervals. Assessed:</p> <ul style="list-style-type: none"> <li>➤ Audit online; audits conducted 08-10-2013 and 18-04-2014 (unannounced) and planned for 2014</li> <li>➤ Audit report Am-064-aud-18 dd 26-11-2013</li> <li>➤ Action list concerning Internal Audit 26-11-2013; Corrective actions are demonstrable</li> </ul>		
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	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: <ul style="list-style-type: none"> <li>• hygiene inspections to assess cleaning and housekeeping performance</li> <li>• fabrication inspections to identify risks to the product from the building or equipment</li> </ul> <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>All suppliers of products and services have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL). Suppliers are well monitored and followed up. Yearly supplier monitoring is done by completing a questionnaire. The risk assessment depends on the kind of material and is based on enquiries, specification / food grade declaration, trial delivery and GFSI certificated QMS of the supplier. Close communication was demonstrated. All suppliers of packaging have to be approved by the central VION office and entered into the system before they can be used. Assessed:</p>		



<p>➤ "Formulier beoordeling leveranciers en diensten" dd 26-11-2013 for</p> <p>➤ Supplier assessment VION Food 2013 dd 28-01-2013</p> <p>➤ questionnaire supplier dd 20-06-2011</p> <p>➤ Transport: is mentioned on List approved transport companys 2014 as a subcontractor of</p>		
Statement of Intent	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.	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"> <li>• allergen contamination</li> <li>• foreign body risks</li> <li>• microbiological contamination</li> <li>• chemical contamination.</li> </ul> <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 acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.</p>	Y
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"> <li>• supplier audits</li> <li>• third party audits or certification, e.g. to BRC Global Standards</li> <li>• supplier questionnaires.</li> </ul> <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).	Y
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	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).	Y



	<p>Raw material acceptance and its release for use shall be based on one or a combination of:</p> <ul style="list-style-type: none"> <li>• visual inspection on receipt</li> <li>• certificates of conformance – specific to each consignment</li> <li>• certificates of analysis</li> <li>• product sampling and testing.</li> </ul> <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>	
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
<b>3.5.3 Management of suppliers of services</b>		
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"> <li>• pest control</li> <li>• laundry services</li> <li>• contracted cleaning</li> <li>• contracted servicing and maintenance of equipment</li> <li>• transport and distribution</li> <li>• off-site storage of ingredients, packaging or products</li> <li>• laboratory testing</li> <li>• catering services</li> <li>• waste management.</li> </ul>	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
<b>3.5.4 Management of outsourced processing</b>		
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"> <li>be undertaken in accordance with established contracts which clearly define any processing requirements and product specification</li> <li>maintain product traceability.</li> </ul>	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
<b>3.6</b>	<b>Specifications</b>	
<p>Specifications for raw materials, packaging materials, cleaning agents and finished products are available through and managed by the involved departments. Specifications are reviewed internally to ensure they are correct and up to date. Food specifications (meat-containing raw materials + finished products) managed by PPD reviewed twice a year. Other specifications checked 1 x / 3 years. Specifications contain relevant aspects and requirements. Samples of specifications taken at this visit demonstrate control:</p> <p>Cleaning and Disinfectants chemicals:</p> <ul style="list-style-type: none"> <li>➤ foodgrade dd 05-05-2011</li> </ul> <p>Finished Product:</p> <ul style="list-style-type: none"> <li>➤ "Wijncervelaat IND" number 12400 including shelflife of reports seen oké</li> <li>➤ "Ardenner Boterhamworst" dd 20-05-2014, Recipe and Kruidenpakket (composition, allergens)</li> <li>➤ Katenspek dd 05-12-2013</li> <li>➤ Shoarma Rollade article number 190300</li> </ul> <p>Raw Materials and Processing aids:</p> <ul style="list-style-type: none"> <li>➤ 28-11-2013</li> <li>➤ 22-11-2013</li> <li>➤ recipe and specification FS Zaanse mosterd rollade, Shoarma rollade</li> </ul> <p>Metal detection is not prescribed cq conducted for each type of product. Products for BtoB are in general not detected. This is not mentioned in the productspecification of the company. Checked for Katenspek. Metal detection is not always required by the customer. Checked "Vragenlijst Leveranciers voedingsmiddelen" dd 16-10-2013</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 case of branded products, include key data to meet legal requirements and assist the customer in the safe usage of the product.	Y
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	<b>Corrective action</b>	
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"> <li>• clear documentation of the non-conformity</li> <li>• <b>assessment</b> of consequences by a suitably competent and authorised person</li> <li>• identification of the corrective action to address the immediate issue</li> <li>• identification of an appropriate timescale for correction</li> <li>• identification of personnel with appropriate authority responsible for corrective action</li> <li>• verification that the corrective action has been implemented and is effective</li> <li>• identification of the root cause of the non-conformity and implementation of any necessary corrective action.</li> </ul>	Y
3.8	<b>Control of non-conforming product</b>	
<p>Non-conforming products / products on hold are physically identified as such with a red coloured label. There is a clear documented procedure for the identification and disposal of non-conforming product. (P-NCB-NL-10013 rev. 6 dd 18-04-2012). Direct action towards non conforming products was clearly demonstrated during the audit. Clear process, well understood by staffs that were interviewed during the audit.</p> <p>Minor 3.8.1 At the raw material storage was a pallet found with incurant raw materials. Some of this raw materials had passed the expiry date. There was no clear identification (f.e. labelling) and registration/report (blockade form) of this non-conforming product available</p>		
Statement of Intent	The company shall ensure that any out-of-specification product is effectively managed to prevent release.	Y
3.8.1	There shall be documented procedures for managing non-conforming products which include: <ul style="list-style-type: none"> <li>• the requirement for staff to identify and report potentially non-conforming product</li> </ul>	N



	<ul style="list-style-type: none"> <li>• clear identification of non-conforming product, e.g. direct labelling or the use of IT systems</li> <li>• secure storage to prevent accidental release, e.g. isolation areas</li> <li>• referral to the brand owner where required</li> <li>• 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</li> <li>• records of the decision on the use or disposal of the product</li> <li>• records of destruction where product is destroyed for food safety reasons.</li> </ul>	
3.9	<b>Traceability</b>	
<p>Traceability system is well 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 (input → output per process step), bar codes and an ERP-system according to 'procedure identification – traceability'. A suitable system has been explained during the audit. The way of coding was shown during the audit.</p> <p>Test for recall and traceability at least annually: performed on 07-01-2014, including mass balance, for final product to raw material. oké</p> <p>A vertical test with all required documents, during the audit was tested for: katenspek slice datum 11-04-2014 and delivered 23-04-2014 with an expiry date 05-05-2014.</p> <ul style="list-style-type: none"> <li>➤ fast tracing (forwards/backwards, including packaging) was possible within the records.</li> <li>➤ Information (CCP registration, Receipt control, GMP registration, Allergen registration) was available within time.</li> </ul> <p>Traceability for foil/packing was controlled for "bag orange (000678)/blue (000081)/frozen (00679)"; oké</p>		
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.	Y
3.10	<b>Complaint handling</b>	
<p>Procedure P-NCB-NL-10022 ver. 8 d.d. 16-05-2013 including flow chart seen. The procedure for complaint handling defines types of complaints and addresses requirements in terms of incident</p>		



<p>reporting as these are escalated to relevant personnel for review and action (corrective / preventive) as appropriate. All complaints are trended, weekly reviewed by the site management team and monthly reported. The reduction of complaints and complaint costs is a topical subject.</p> <p>Assessed:</p> <ul style="list-style-type: none"> <li>➤ Overview of complaints 2013 and 2014 ytd). In 2014       complaints reported.</li> <li>➤ Foreign bodys is the major part of the complaints. CA are taken by instruction employees.</li> <li>➤ Complaint 27-04-2014 concerning a out of spec (microbiological). oké</li> </ul> <p>In general appropriate actions to clients, internal organisation and / or suppliers seen. Food safety related complaints get extra focus from the organisation. No complaints from the authorities.</p>		
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
<b>3.11</b>	<b>Management of incidents, product withdrawal and product recall</b>	
<p>There is a company's crisis and recall management procedure (P-FOOD-10014) 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.</p> <p>Assessed:</p> <ul style="list-style-type: none"> <li>➤ Withdrawal Metworst (Listeria Monocytogenes) with production date 20-01-2014; CCP's are under control on the day of production.pH of the product was low enough to inhibit growth of Listeria. Withdrawal of all product was demonstrable.</li> </ul>		
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	<p>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:</p> <ul style="list-style-type: none"> <li>• disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications</li> <li>• events such as fire, flood or natural disaster</li> <li>• malicious contamination or sabotage.</li> </ul> <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>	Y

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"> <li>• identification of key personnel constituting the recall management team, with clearly identified responsibilities</li> <li>• guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained</li> <li>• 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</li> <li>• a communication plan including the provision of information to customers, consumers and regulatory authorities in a timely manner</li> <li>• details of external agencies providing advice and support as necessary, e.g. specialist laboratories, regulatory authority and legal expertise</li> <li>• a plan to handle the logistics of product traceability, recovery or disposal of affected product and stock reconciliation.</li> </ul> <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>This location has been suitable maintained and well equipped; makes in general a logical and safe way of processing possible; f.e. intake, storage, processing (raw material preparation, mixing, packing), storage and dispatch. The factory is situated in an industrial area, well maintained external areas. No local activities that would risk product contamination could be recognized. External areas to production/ office buildings are well maintained. A paved surface is build around the building.</p>		
Statement of Intent	<p>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.</p>	Y
4.1.1	<p>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.</p>	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
<b>4.2 Security</b>		
Site boundaries well defined and 24 hour security in place with security card for employees on all potential entry points to the plant. The site is fully fenced in and has camera surveillance. The company is registered by the Food and Consumer Product Safety Authority (official approval NL 61 EG).		
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 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.	Y
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
<b>4.3 Layout, Product Flow and Segregation</b>		
The processing and packaging parts of the production are in general well designed to prevent contamination risk. Based upon a risk assessment all zones are "low risk" or "high care". This is correct (conform appendix 2). Transfer points have been considered as part of the HACCP study and do not represent a potential threat to product safety. Premises allow sufficient working space and capacity to work in a proper way. There were no temporary constructions. Decision for "High Care" at slice department and cooking department is based on the fact that Listeria Monocytogenes can not growth because: > Using of preservatives (E250) in the sliced products		
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	There shall be a plan of the site which designates areas where product is at different levels of risk from contamination; that is: <ul style="list-style-type: none"><li>▪ enclosed product areas</li></ul>	Y



	<ul style="list-style-type: none"> <li>• low-risk areas</li> <li>• high-care areas</li> <li>• high-risk areas.</li> </ul> <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>	
4.3.2	<p>The site plan shall define:</p> <ul style="list-style-type: none"> <li>• access points for personnel and travel routes</li> <li>• location of staff facilities and routes to the facilities from places of work</li> <li>• production process flow</li> <li>• routes for the removal of waste</li> <li>• routes for the movement of rework.</li> </ul> <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>	Y
4.3.3	<p>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.</p>	Y
4.3.4	<p>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.</p>	Y
4.3.5	<p>Where <b>high-care areas</b> 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.</p>	Y
4.3.6	<p>Where <b>high-risk areas</b> 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).</p>	N/A
4.3.7	<p>Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions.</p>	Y



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.	Y
4.4	<b>Building fabric</b> 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 mostly suitable. Good facilities in the cold store of the curing department ('pekelcel 148') the ceilings are painted and product is covered by plastic sheet. No direct product contamination seen. The so-called 'high-care' area does contain several departments of which only two departments are equipped with a positive air pressure ventilation system.</p>		
Statement of Intent	The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.	Y
4.4.1	<b>Walls</b> shall be constructed, finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	Y
4.4.2	<b>Floors</b> 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	<b>Drainage</b> , 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 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.	Y
4.4.4	Where sites include <b>high-care</b> or <b>high-risk</b> 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.	Y
4.4.5	<b>Ceilings and overheads</b> shall be constructed, finished and maintained to prevent the risk of product contamination.	Y
4.4.6	Where <b>suspended ceilings</b> 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, <b>windows</b> , 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	<b>Doors</b> 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	Y

	emergencies. Where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.	
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.	Y
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. Water quality is defined as a general control measure. A water distribution plan is available. Quality of water is monitored in an adequate way. The air is controlled by regular filter inspections and changes. All gases used on site in contact with food or packaging are bought from approved suppliers and certified as being food safe, e.g. N<sub>2</sub> + CO<sub>2</sub>. Compressed air is used for equipment and to clean. For compressed air the control is less well developed due to a lack of suitable methods. Compressors are free of oil.</p> <p>Assessed:</p> <ul style="list-style-type: none"> <li>➤ "Mengwater" 39,6°C, Certificate dd 12-02-2014; oké</li> <li>➤ "Sproei douche rokerij" 58,6°C, Certificate dd 05-12-2013; oké</li> <li>➤ "Worstmakerij" 12,6°C Certificate dd 12-02-2014; oké</li> <li>➤ "Scherfjys" dd 17-09-2013; oké</li> </ul>		
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	Y

	potable for initial product cleaning (e.g. for the storage/washing of fish), the water shall meet the designated legal requirement for this operation.	
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.	Y
4.6	<b>Equipment</b>	
<p>All equipment was seen as suitably designed and used to minimise potential contamination. The used equipment is suitable for its purpose. No evidence is found during the inspection on contamination of the product. Use of well known brands of equipment for food applications. New equipment is purchased as required and specified.</p> <p><b>Minor 4.6.2</b>          There is no declaration or statement of compliance for the elevator belt available on the new Gammon production line whether this belt is suitable for food contact and meets the legal requirements.</p>		
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.	N
4.7	<b>Maintenance</b>	
<p>Equipment is maintained and on the planned maintenance system. Maintenance is also outsourced to established companies within the food and meat business, e.g. Registrations to confirm that the preventive maintenance or preventive controls have been carried out as planned are in place. Assessed:</p> <ul style="list-style-type: none"> <li>➤ Machine overview Encebe; Storing en werkzaamheden lijst 2014</li> <li>➤ Corrective maintenance 05-05-2014 "Transportband dompelaar" correct release</li> <li>➤ Maintenance planning Encebe 2014; specially Gammon Joint line and injector 107700 – oké</li> <li>➤ Annual controle metal detector; oké</li> <li>➤ Specifications:             <ul style="list-style-type: none"> <li>○ (Gammon Joint line) dd 13-05-2013</li> </ul> </li> </ul>		
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	Y



	documented and appropriate action taken.	
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 practicable and within a defined timescale.	Y
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	<b>Staff facilities</b>	
<p>There were suitable changing rooms for staff. The rooms are sited to production. Separation in work wear and personal clothing/items. Staff facilities are designed and operated to minimise the risk of contamination. Staff facilities are suitable for the operation. Suitable hand washing facilities with suitable warm water, liquid soap, single use towels, taps with hand-free operation and clear advisory sign to prompt hand-washing.</p> <p>High-care area, personnel entered area 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 complies with the requirements. Well designed canteen, separated smoking area. Well controlled facilities. No external catering.</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 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).	Y
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,	Y





	processing, packing and storage areas.	
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.	Y
4.8.4	<p>Where an operation includes a <b>high-care area</b>, 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"> <li>• clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing</li> <li>• dedicated footwear, by exception shoe coverings shall be provided for visitors only to be worn in the high-care area</li> <li>• 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</li> <li>• protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care area</li> <li>• hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing</li> <li>• on entry to high-care areas, hand-washing and disinfection shall be provided.</li> </ul>	Y
4.8.5	<p>Where an operation includes a <b>high-risk area</b>, 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:</p> <ul style="list-style-type: none"> <li>• clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing</li> <li>• dedicated footwear shall be provided to be worn in the high-risk area</li> <li>• an effective system shall be provided to segregate areas for wearing high-risk and other footwear, e.g. a barrier or bench system</li> <li>• protective clothing shall be visually distinctive from that worn in other areas and shall not be worn outside of the high-risk area</li> <li>• hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing</li> <li>• on entry to high-risk areas, hand-washing and disinfection shall be provided.</li> </ul>	N/A
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"> <li>• sufficient quantity of water at a suitable temperature</li> <li>• liquid soap</li> <li>• single use towels or suitably designed and located air driers</li> <li>• water taps with hand-free operation</li> <li>• advisory signs to prompt hand-washing.</li> </ul>	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"> <li>• basins with soap and water at a suitable temperature</li> <li>• adequate hand-drying facilities</li> <li>• advisory signs to prompt hand-washing.</li> </ul> <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 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.</p>	Y
4.8.9	<p>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.</p>	Y
4.8.10	<p>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).</p>	Y
<p><b>4.9 Chemical and physical product contamination control</b> Raw material handling, preparation, processing, packing and storage areas.</p>		
<p>Control over cleaning chemicals on site was demonstrated. Separate storage facility for cleaning chemicals in place. Authorised access by cleaning company and production department. MSDS available and specifications confirm suitability for use in food processing industries</p> <p>The HACCP study has determined that metal detection is not necessary as CCP. The metal detectors are checked during production by the quality employee. Procedures are in place in case the metal detector does not detect the test bullet. Metal hazard is controlled by metal checks too (machine / knife intactness) in relation to the hazard analysis. Registration and corrective actions could be demonstrated. A knife handling policy is in place.</p> <p>Assessed: &gt; Procedure "Metaal detectie gemerkte producten" dd 19-02-2014</p> <p>A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. Daily hygiene audits by production department (pre-SSOP and SSOP) include glass / hard plastic. Glass / hard plastic audits regularly carried out by QA (1 x / 3 month). Wooden pallets are not permitted in production, but clearly used at the end of the packing line; no risk to product as all products are fully packed. Assessed:</p>		



<p>➤ Glass register: Incident report "Glasbreuk/HP/Metaal" dd 10-05-2014, 28-11-2013 and 07-11-2013; oké</p> <p>➤ Glass/Hard plastic audit d.d. 20-01-2014 and 29-04-2014</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	<b>Chemical control</b>	
4.9.1.1	<p>Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These shall include as a minimum:</p> <ul style="list-style-type: none"> <li>• an approved list of chemicals for purchase</li> <li>• availability of material safety data sheets and specifications</li> <li>• confirmation of suitability for use in a food processing environment</li> <li>• avoidance of strongly scented products</li> <li>• the labelling and/or identification of containers of chemicals at all times</li> <li>• segregated and secure storage with restricted access to authorised personnel</li> <li>• use by trained personnel only.</li> </ul>	Y
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	<b>Metal control</b>	
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	<b>Glass, brittle plastic, ceramics and similar materials</b>	
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"> <li>• a list of items detailing location, number, type and condition</li> </ul>	Y



	<ul style="list-style-type: none"> <li>recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product</li> <li>details on cleaning or replacing items to minimise potential for product contamination.</li> </ul>	
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"> <li>quarantining the products and production area that were potentially affected</li> <li>cleaning the production area</li> <li>inspecting the production area and authorising to continue production</li> <li>changing of workwear and inspection of footwear</li> <li>specifying those staff authorised to carry out the above points</li> <li>recording the breakage incident.</li> </ul>	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"> <li>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.</li> <li>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.</li> <li>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.</li> <li>the use of dedicated, accessible lidded waste containers for the collection of damaged containers and fragments.</li> <li>a documented inspection of production equipment is undertaken following the cleaning of a breakage to ensure cleaning has effectively removed any risk of further contamination.</li> <li>authorisation is given for production to re-start following cleaning.</li> <li>the area around the line is kept clear of broken glass.</li> </ul>	N/A
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	Y





	to ensure it is in good condition and free from damage or splinters which could contaminate products.	
4.10	Foreign body detection and removal equipment	
	<p>Foreign body alertness has the attention of all people dealing with products. Metal detection devices (CP) are applied for all stuffed and packed products. Appropriate foreign body detection equipment is in place. Effective operation demonstrated. Metal detectors are operating to the best industry standards and are located at the filling station and at the slicing / packaging department. Level of sensitivity depends on the department:</p> <ul style="list-style-type: none"> <li>▪ at the production department (filler stuffer): 1,2 mm Ferrous – 1,6 mm Non Ferrous – 2,4 mm Stainless Steel.</li> <li>▪ at the slicing department: 1,5 mm Ferrous – 2,5 Non Ferrous – 3,5 mm Stainless Steel.</li> </ul> <p>Control of metal detection implemented effectively (start-up, 1 x / hour, end of production day) and documented accordingly. 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. There is one sieve in the brine equipment. Instructions are made for and implemented by the relevant workers</p> <p>Assessed:</p> <ul style="list-style-type: none"> <li>&gt; Working metaldetector (Fe 2,5 – NFE 3,0 and RVS 3,5); Records of daily control seen; No remarks.</li> <li>&gt; Industrial: Working metaldetector (NFE 2.5 – RVS 3.0 – FE 2,0); Form "Productie Hamblokjes IQF" dd 20-05-2014; Records of daily control seen; No remarks.</li> <li>&gt; Procedure "Messenbeleid" dd 28-04-2014</li> </ul> <p>Minor 4.10.3.1 For one product <sup>1</sup> katenspeck 1,6 kg<sup>2</sup> was seen that no metall detection was applied.</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	<p>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:</p> <ul style="list-style-type: none"> <li>• filters</li> <li>• sieves</li> <li>• metal detection</li> <li>• magnets</li> <li>• optical sorting equipment</li> <li>• X-ray detection equipment</li> <li>• other physical separation equipment e.g. gravity separation, fluid bed technology.</li> </ul>	Y
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"> <li>• specific customer requirements</li> <li>• the company's ability to identify, hold and prevent the release of any affected materials, should the equipment fail.</li> </ul>	Y
4.10.1.4	<p>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.</p>	Y
4.10.2	Filters and sieves	
4.10.2.1	<p>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.</p>	N/A
4.10.2.2	<p>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 taken.</p>	N/A
4.10.3	Metal detectors and X-ray equipment	
4.10.3.1	<p>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).</p>	N
4.10.3.2	<p>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.</p>	Y
4.10.3.3	<p>The metal detector or X-ray equipment shall incorporate one of the following:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• a belt stop system with an alarm where the product cannot be automatically rejected, e.g. for very large packs</li> <li>• in-line detectors which identify the location of the contaminant shall be operated to allow effective segregation of the affected product.</li> </ul>	Y



4.10.3.4	<p>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:</p> <ul style="list-style-type: none"> <li>responsibilities for the testing of equipment</li> <li>the operating effectiveness and sensitivity of the equipment and any variation to this for particular products</li> <li>the methods and frequency of checking the detector</li> <li>recording of the results of checks.</li> </ul>	Y
4.10.3.5	<p>Metal detector checking procedures shall be based on best practice and shall as a minimum include:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>a test that both the detection and rejection mechanisms are working effectively under normal working conditions.</li> <li>checks that test the memory/reset function of the metal detector by passing successive test packs through the unit.</li> </ul> <p>In addition, where metal detectors are incorporated on conveyors:</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>Where in-line metal detectors are used the test piece shall be placed in the product flow wherever this is possible.</p>	Y
4.10.3.6	<p>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.</p>	Y
4.10.4	Magnets	
4.10.4.1	<p>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.</p>	N/A
4.10.5	Optical sorting equipment	
4.10.5.1	<p>Each unit shall be checked in accordance with the manufacturer's instructions or recommendations. Checks shall be documented.</p>	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 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.	N/A
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>Cleaning is done by subcontractor in the evening / at night when production has stopped. Cleaning schedules of are available and cover equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) executed on demand. Socks controlled by maintenance department. The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP). Swabs for pathogenic bacteria like Listeria are taken. CIP is not applied.</p> <p><b>Assessed:</b></p> <ul style="list-style-type: none"> <li>&gt; Cleaning matrix and Cleaning plan "Frequentie schema Encebe 2013 and 2014"</li> <li>&gt; Swabplan 2014 and trend overview agar results 2014</li> <li>&gt; Listeria 2014 (ytd) results; oké</li> </ul>	
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"> <li>• responsibility for cleaning</li> <li>• item/area to be cleaned</li> <li>• frequency of cleaning</li> <li>• method of cleaning, including dismantling equipment for cleaning purposes where required</li> <li>• cleaning chemicals and concentrations</li> <li>• cleaning materials to be used</li> <li>• cleaning records and responsibility for verification.</li> </ul> <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	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	Y



	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.	
4.11.3	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.	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"> <li>fit for purpose</li> <li>suitably identified for intended use, e.g. colour coded or labelled</li> <li>cleaned and stored in a hygienic manner to prevent contamination.</li> </ul> <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	<b>Cleaning in place (CIP)</b>	
4.11.6.1	Cleaning-in-place (CIP) facilities, where used, shall be monitored and maintained to ensure their effective operation.	N/A
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"> <li>systems are hygienically designed with no dead areas, limited interruptions to flow streams and good system drain ability.</li> <li>scavenge pumps are operated to ensure that there is no build-up of cleaning fluids in the vessels.</li> <li>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.</li> <li>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.</li> </ul> <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>	N/A
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"> <li>The process parameters, time, detergent concentrations, flow rate and temperatures shall be defined to ensure removal of the appropriate target</li> </ul>	N/A

	<p>hazard, e.g. soil, allergens, vegetative microorganisms, spores. This shall be validated and records of the validation maintained.</p> <ul style="list-style-type: none"> <li>• Detergent concentrations shall be checked routinely.</li> <li>• 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.</li> <li>• 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.</li> <li>• Filters, where fitted, shall be cleaned and inspected at a defined frequency.</li> </ul>	
4.12 Waste/waste disposal		
<p>Suitable internal and external ( –cat 3) handling regarding to waste disposal. Frequency of emptying is appropriate. Nypro guarantee that (packed) finished product will be removed from the market (fermentation).</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"> <li>• clearly identified</li> <li>• designed for ease of use and effective cleaning</li> <li>• well-maintained to allow cleaning and, where required, disinfection</li> <li>• emptied at appropriate frequencies</li> <li>• covered or doors kept closed as appropriate.</li> </ul>	Y
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>Contracted (central) for rodents (rats and mice) and insects (cockroaches and flying insects); frequency of control is 8 x / year; maintenance of EFK is 1 x / year, including an in-depth survey each second survey (Frequency of the in-depth pest control survey is risk based). All documentation is present in the contract map of . Up to date site plans (from 23-04-2014) are available to show the location of rodent baits, mouse traps, crawling and flying insect control units. Constructional action points are solved. An effective control programme could be shown. Assessed:</p>		



- Building inspection report 25-04-2014 (in-depth survey); No remarks;
- Visit report 23-04-2014 and 17-10-2013 (maintenance EFK); No remarks
- Trend analysis 2013/2014 assessed. Pest is under control; December 2013-April 2014 pest activity (little bit increased) outside the building. Correct actions are taken.

All required items well recorded, including an actual plan and specifications of pest control products.

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	Where a company undertakes its own pest control, it shall be able to effectively demonstrate that: <ul style="list-style-type: none"> <li>• pest control operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site</li> <li>• sufficient resources are available to respond to any infestation issues</li> <li>• there is ready access to specialist technical knowledge when required</li> <li>• legislation governing the use of pest control products is understood</li> <li>• dedicated locked facilities are used for the storage of pesticides.</li> </ul>	Y
4.13.3	Pest control documentation and records shall be maintained. This shall include as a minimum: <ul style="list-style-type: none"> <li>• an up-to-date plan of the full site identifying numbered pest control device locations</li> <li>• identification of the baits and/or monitoring devices on site</li> <li>• clearly defined responsibilities for site management and for the contractor</li> <li>• details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies</li> <li>• any observed pest activity</li> <li>• details of pest control treatments undertaken.</li> </ul>	Y
4.13.4	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.	Y
4.13.5	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	Y





	extermination device and contaminating the product, alternative systems and equipment shall be used.	
4.13.6	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.	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	Results of pest control inspections shall be assessed and analysed for trends on a regular basis, but as a minimum: <ul style="list-style-type: none"> <li>• in the event of an infestation</li> <li>• annually</li> </ul> <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	<b>Storage facilities</b>	
<p>Internal storage in separated cold stores and one freezer. Products are transported to a distribution centre   General handling procedure and temperature control is applicable during storage and loading of the products. No outside storage applicable. Assessed:</p> <p>&gt; Delivery °C dd 20-05-2014 concerning CCP 1 and 2</p> <ul style="list-style-type: none"> <li>o Product temperature measured during the audit of "Longhaas en lever" 2,4-2,6°C</li> <li>o Form "Ontvangst vlees grondstoffen" dd 20-05-2014</li> <li>o Temperatuur device used for CCP; calibrated 31-05-2014</li> </ul>		
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	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: <ul style="list-style-type: none"> <li>• managing chilled and frozen product transfer between temperature controlled areas</li> <li>• segregation of products where necessary to avoid cross-contamination</li> </ul>	Y

	<p>(physical, microbiological or allergens) or taint uptake</p> <ul style="list-style-type: none"> <li>• storing materials off the floor and away from walls</li> <li>• specific handling or stacking requirements to prevent product damage.</li> </ul>	
4.14.2	<p>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.</p>	Y
4.14.3	<p>Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the storage conditions.</p>	Y
4.14.4	<p>Where storage outside is necessary, items shall be protected from contamination and deterioration.</p>	Y
4.14.5	<p>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.</p>	Y
4.15	<p><b>Dispatch and transport</b></p> <p>Dispatch and release of products is based upon general handling procedures. Temperature control is applicable during storage, loading and transport of the products. Product is loaded in covered bays. All transport and storage is subcontracted following P-NLFOOD-10038 from 01-10-2009. VION Food (central office) is contract owner. The content of the contract complies with the requirements. VION reviews the performance of these transport companies</p> <p><b>Assessed:</b></p> <p>➤ Transport:                           I is mentioned on List approved transport companys 2014 as a subcontractor of</p>	
Statement of Intent	<p>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.</p>	Y
4.15.1	<p>Documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include as appropriate:</p> <ul style="list-style-type: none"> <li>• controlling temperature of loading dock areas</li> <li>• the use of covered bays for vehicle loading or unloading</li> <li>• securing loads on pallets to prevent movement during transit</li> <li>• inspection of loads prior to dispatch.</li> </ul>	Y



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	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: <ul style="list-style-type: none"> <li>• in a suitably clean condition</li> <li>• free from strong odours which may cause taint to products</li> <li>• suitably maintained to prevent damage to products during transit</li> <li>• equipped to ensure any temperature requirements can be maintained.</li> </ul> Records of inspections shall be maintained.	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	The company shall have documented procedures for the transport of products, which shall include: <ul style="list-style-type: none"> <li>• any restrictions on the use of mixed loads</li> <li>• requirements for the security of products during transit, particularly when vehicles are parked and unattended</li> <li>• 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.</li> </ul>	Y
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

Product- or process development is part of the QMS. Documented product design and development procedure exists (P-NCB-NL-10122). A development / validation protocol is available. Claims made



about organic status / GMO / Good Farming Star. Procedures and working instructions are available and in practice correct implemented to comply with the claim(s) standard. No remarks.

Allergen policy is part of the productdevelopment proces and changes are discussed in the HACCP team. Assessed:

- > NPD concerning Gammon Joints and "Beenham smokde" dd 12-05-2014
  - o Master Data Management: go/no proces
  - o PPD-meeting minutes dd 25-11-2013, 31-03-2013 and 05-05-2014

Complaints, shelflife test and NPD are discussed regularly at this meeting.

**Minor 5.1.5**

For a product "katenspeck" two different labels ( originele katenspek) with a different ingredient declaration was in use. For both labels applies that there is one recipe.

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).	Y
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 introduced into the factory environment.	Y
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.	N



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.	Y
5.2	<b>Management of allergens</b>	
<p>A general production method for handling specific materials like allergens is applied. Risk assessment of allergen cross contamination has been considered for products under the scope. Identification and segregation preventive measures in place. Proper precautions of segregation are mostly taken to prevent cross contamination. Allergen containing ingredients are listed: mustard, celery, gluten, milk and soya. A list has been made in which slicing sequence is normally defined. Additional cleaning required between certain slicing steps. Rework is in accordance with the rework procedure and ensures traceability.</p> <p><b>Minor 5.2.4</b> At the raw material storage some ingredients are weighed out in smaller parts. Measures are only taken to prevent cross contamination by weighing out of mustard seed containing ingredients. There are no preventive measures taken for other allergens like gluten in other ingredients which are also weighed. The used list of allergen at this department is not complete</p>		
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.	Y
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 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.	Y
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.	Y
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"> <li>• consideration of the physical state of the allergenic material, i.e. powder, liquid, particulate</li> <li>• identification of potential points of cross-contamination through the process flow</li> <li>• assessment of the risk of allergen cross-contamination at each process step</li> <li>• identification of suitable controls to reduce or eliminate the risk of cross-contamination.</li> </ul>	Y



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"> <li>• physical or time segregation whilst allergen-containing materials are being stored, processed or packed</li> <li>• the use of separate or additional protective over clothing when handling allergenic materials</li> <li>• use of identified, dedicated equipment and utensils for processing</li> <li>• scheduling of production to reduce changes between products containing an allergen and products not containing the allergen</li> <li>• systems to restrict the movement of airborne dust containing allergenic material</li> <li>• waste handling and spillage controls</li> <li>• restrictions on food brought onto site by staff, visitors, contractors and for catering purposes.</li> </ul>	N
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.	Y
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.	Y
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.	Y
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.	Y
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.	Y
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.	Y
5.3	Provenance, assured status and claims of identity preserved materials	
<p>Logo's and claims applicable about organic status / GMO / Good Farming Star. Identity preservation is applicable, e.g. for organic products "SKAL" as demonstrated during the visit. Measures to ensure identity of organic products are in place, e.g. green label. A weekly massbalance is conducted to control the production of organics.</p>		

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	<b>Product Packaging</b>	
<p>Primary packaging materials are appropriate for the intended use and stored under conditions to minimise the risk of contamination and deterioration. 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.</p> <p>Assessed:</p> <p>➤ Bags (orange/blue/frozen) from ; Supplier statement compliance march 2014</p> <p>Minor 5.4.1          There are no specifications available for the (orange – 00ZA000678, blue-00ZA000081, and dark blue-00ZA000679) different used crate bags on the industrial department (frozen product). Secondly, the statement of compliance concerning this bags (including migration test are showed by the company is only applicable for foils using at ambient temperature.</p>		
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.	N
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	Y



	in a separate area and systems shall be in place to prevent accidental use.	
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	<b>Product inspection and laboratory testing</b>	
<p>A sample scheme is set up as part of a microbiological monitoring program for product testing at production date and at end of shelf life conforms to Regulation 2073/2005/EC. The frequency of monitoring depends on the risk and the product group:</p> <ul style="list-style-type: none"> <li>▪ Pasteurized and packed products: every 4 weeks 3 microbiological analyses;</li> <li>▪ Pasteurized and sliced products: 1 x / week 5 microbiological analyses;</li> <li>▪ Fermented products: 1 x / week 5 microbiological analyses.</li> </ul> <p>All analyses are subcontracted to an accredited laboratory operating in accordance with ISO 17025: Results of TPC and pathogens are analysed and reported on a monthly basis (periodical report). Trend graphs are applied. Raw materials are checked visually and on temperature at receipt. Assessed:</p> <ul style="list-style-type: none"> <li>➤ Microbiological Sampling P-FOOD-10018</li> <li>➤ Shelf life test 2013; "Verpakte-gepastueriseerde vleesproducten" and specific for "schweinegoulash; oké</li> <li>➤ Sampling Listeria Monocytogenes/salmonella period 2013-12 until 2014-04</li> <li>➤ "Rauw gehakt" dd 06-05-2014, 08-01-2014 and 26-02-2014 (n=5)</li> </ul> <p>Product (organoleptic) test is conducted after after each production batch. Seen for production 19-05-2014 and results Q1-2014. Results of visual control of the canned "Boterhamworst" Q1-2014 also seen.</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	<b>Product inspection and testing</b>	
5.5.1.1	There shall be a scheduled programme of testing covering 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.	Y
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.	Y
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	<b>Laboratory testing</b>	

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"> <li>• design and operation of drainage and ventilation systems</li> <li>• access and security of the facility</li> <li>• movement of laboratory personnel</li> <li>• protective clothing arrangements</li> <li>• processes for obtaining product samples</li> <li>• disposal of laboratory waste.</li> </ul>	Y
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 available where accredited methods are not undertaken.	Y
5.5.2.4	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: <ul style="list-style-type: none"> <li>• use of recognised test methods, where available</li> <li>• documented testing procedures</li> <li>• ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required</li> <li>• use of a system to verify the accuracy of test results, e.g. ring or proficiency testing</li> <li>• use of appropriately calibrated and maintained equipment.</li> </ul>	Y
5.6	<b>Product release</b>	
Finished product is fit for delivery unless it is in blockade. Only authorised personnel are allowed to release products. Product release is done by the QA Manager or General Manager.		
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. Assessed for CCP temperature control during pasteurization and sterilization. All processes are validated with records maintained, 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. Assessed:

- Form Pasteurisation controle (F-NCB-NL-10034) d.d. 27-03-2014 (CCP 4)
- Form "Verificatie CCP ontvangsttemperatuur" week 10-2014
- Form "Ontvangst (biologische) vleesgrondstoffen CCP 1 and 2 dd 06-03-2014 and 25-03-2014; oké
- Sterilisation control "Boterhamworst blik 1/1" dd 14-05-2014, 10-04-2014 and 25-04-2014
- Form "Fermentatie controle CCP" dd 08-05-2014
- Fake alarm temperature controle once per week

**Minor 6.1.2**

Before (vacuum) packing of meat products a temperature check must be conducted by the operator. The by the operator recorded temperature checks were controlled by doing a second measurement at the same product. There was a big difference between the recorded temperature and the secondly measured temperature which can not be explained by the time difference and it heating up scenario.

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"> <li>• recipes – including identification of any allergens</li> <li>• mixing instructions, speed, time</li> <li>• equipment process settings</li> <li>• cooking times and temperatures</li> <li>• cooling times and temperatures</li> <li>• labelling instructions</li> <li>• coding and shelf life marking</li> <li>• any additional critical control points identified in the HACCP plan.</li> </ul>	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.	N
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; temperature	Y



	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.	Y
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
<b>6.2 Quantity-weight, volume and number control</b>		
<p>All products are sold by weight. Metrology controls the balances for commercial purpose. The devices are tested internally on a daily basis. No issues identified. Calibration of the scales is demonstrable using standard weights. Records were available.</p> <p>&gt; Calibration weighing scales</p> <ul style="list-style-type: none"> <li>○ dd 08-04-2014</li> <li>○ Floor scales dd 17-05-2014 and 15-05-2014</li> </ul>		
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
<b>6.3 Calibration and control of measuring and monitoring devices</b>		
<p>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, PT 100 probes) is adequate according to the calibration records. No adjustments are possible. Assessed:</p> <p>&gt; Procedure "Kallibreren van bewakings- en meetapparatuur" dd 23-04-2014</p>		

- Procedure "Kallibratie" dd 23-04-2014
- Callibration planning 2014
- Callibration planning Autoclaaf 2011; In 2014 conducted as planned
- Calibration report " " room concerning temperature device "Rokerij – 149" dd 13-05-2014; oké
- Thermometers CCP 1/2 - Thermometer " " report 2014; calibrated with reference thermometer certificate 1403357 dd 23-04-2014
- Gas analyser " " dd 16-05-2014

**Minor 6.3.2**

A logger is used for calibration of the temperature measuring device at the pasteurisation and sterilisation equipment. The company could not show any records if this logger was recently (within a year) calibrated.

Statement of Intent		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"> <li>• a documented list of equipment and its location</li> <li>• an identification code and calibration due date</li> <li>• prevention from adjustment by unauthorised staff</li> <li>• protection from damage, deterioration or misuse.</li> </ul>	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"> <li>• at a predetermined frequency, based on risk assessment</li> <li>• to a defined method traceable to a recognised national or international Standard where possible.</li> </ul> <p>Results shall be documented. Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform.</p>	N
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 to 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 is evidence of introduction training for new starters, temporary workers and contractors. Clear competency training (on food safety and quality) had taken place for the staff sampled. Training effectiveness is monitored (exam). Refresher training is carried out every 3 years for personnel involved in monitoring activities. Checked for several employees (4x) if they are trained for there job, working with a CCP and personal hygiene. Records seen from a refresher training HACCP (2013), "Hygiene en Voedselkwaliteit" and "Werken bij Vion".</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"> <li>identifying the necessary competencies for specific roles</li> <li>providing training or other action to ensure staff have the necessary competencies</li> <li>reviewing the effectiveness of training</li> <li>the delivery of training in the appropriate language of trainees.</li> </ul>	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"> <li>the name of the trainee and confirmation of attendance</li> <li>the date and duration of the training</li> <li>the title or course contents, as appropriate</li> <li>the training provider.</li> </ul> <p>Where training is undertaken by agencies on behalf of the company, records of the training shall be available.</p>	Y
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	<p>Personal hygiene Raw material handling, preparation, processing, packing and storage areas.</p>	
<p>The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel prior to commencing work. These hygiene rules are effectively enforced.</p> <p>Well detailed hygiene rules are documented and signed by employees. Checked for temporary workers (2x) and own employees (4x). Smoking is only allowed at a separate room at the canteen. Hand cleaning is provided at the entrance of the production and special for packing employees at the entrance of the</p>		



clean room. Medicine use is set at the hygiene rules		
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"> <li>• Watches shall not be worn.</li> <li>• Jewellery shall not be worn, with the exception of a plain wedding ring or wedding wristband.</li> <li>• Rings and studs in exposed parts of the body, such as ears, noses, tongues and eyebrows, shall not be worn.</li> <li>• Fingernails shall be kept short, clean and unvarnished. False fingernails shall not be permitted.</li> <li>• Excessive perfume or aftershave shall not be worn.</li> </ul> <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	<b>Medical screening</b>	
<p>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 hygiene protocol. Health questionnaire is applicable for all visitors and contractors. Persons who are suffering from a relevant infectious disease are not allowed to enter the production facilities. Medicine use is set at the hygiene rules.</p>		
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 disease. Expert medical advice shall be sought where required.	Y
7.4	<b>Protective clothing</b> 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 trousers, jackets and rubber boots / shoes. hairnets with surgical masks are applied, all hair is enclosed. Mob hats are single use. Good adherence to the dress code observed during the site evaluation. No top coat during breaks (eating, drinking and / or smoking). Clean and dirty clothes stored separately. Sufficient amounts are available at all times. Employees can change daily. The external laundry complies with the requirements of the Global Standard for Food Safety. Cleaning of work wear checked by means of agar.</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"> <li>• is provided in sufficient numbers for each employee</li> <li>• is of suitable design to prevent contamination of the product (as a minimum containing no external pockets above the waist or sewn on buttons)</li> <li>• fully contains all scalp hair to prevent product contamination</li> <li>• includes snoods for beards and moustaches where required to prevent product contamination.</li> </ul>	Y
7.4.3	Laundering 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 laundering 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	Y





	in enclosed product or low-risk areas only.	
7.4.4	<p>Where protective clothing for <b>high-care or high-risk areas</b> 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"> <li>• effective cleaning of the protective clothing</li> <li>• clothes are commercially sterile following the washing and drying process</li> <li>• adequate segregation between dirty and cleaned clothes</li> <li>• cleaned clothes are protected from contamination until delivered to the site, e.g. by the use of covers or bags.</li> </ul>	Y
7.4.5	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.	Y
7.4.6	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.	Y