Audit Report

Global Standard for Food Safety Issue 7: July 2015

1.Audit Summary

Company name	**Vion Food Group**	BRC Site Code	**9714502**
Site name	**Encebe Vleeswaren B.V.**		
Scope of audit	**Producing (cutting, slicing, mincing, blending, fermenting, pasteurising, sterilising, marinating) and packing (modified atmosphere, chilled, frozen, canned) of meat products of beef, pork and poultry in consumer and bulk packaging.**		
Exclusions from scope	**None**		
Justification for exclusion	**N/A**		
Audit Finish Date	**2016-11-23**		
Re-audit due date	**2017-12-17**		

Voluntary modules included

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

2. Audit Results

Audit result	**Certificated**	Audit grade	**B**	Audit type	**Announced**
Previous audit grade	**AA**	Previous audit date	**2015-11-17**		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	1
	Minor	6

3.Company Details

Address	**Boseind 10, 5281 RM Boxtel**		
Country	**Netherlands**	Site Telephone Number	
Commercial representative Name		Email	**@vionfood.com**
Technical representative Name		Email	**@vionfood.com**

4.Company Profile

Plant size (metres square)	No. of employees	No. of HACCP plans	**1-3**
Subcontracted processes	**No**		
Other certificates held	ISO 9001, Skal, 'Beter Leven Kenmerk'		
Regions exported to	**Europe** Choose a region Choose a region Choose a region Choose a region Choose a region		
Company registration number	**EG-61-NL**		
Major changes since last BRC audit	**No Major changes since last BRC audit**		

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. 1 HACCP study is available and site is less than square meters.
The company is producing and selling ca. 300 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 tons per week. The company is also producing an assortment of products based on organic raw materials (SKAL certificated). The company is certificated for 'Beter Leven Kenmerk' 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. Since the previous audit no major changes in processing, equipment, routing and assortment have been occurred.
Official approval EG-61-NL of the Food and Consumer Product Safety Authority

5.Product Characteristics

Product categories	08 - Cooked meat/fish products 09 - Raw cured or fermented meat and fish Category Category Category Category
Finished product safety rationale	Finished product safety rationale Short shelf life, presence of preservatives, packed at modified atmosphere or vacuum, cooked, chilled, frozen, hermetically closed casing or vacuum packaging or canned.

High care	Yes	High risk	No	Ambient high care	No

Justification for area	Preservation of products is based on the combination of a heath treatment and another preserving method; eg acetate, diacetate.

Allergens handled on site	**Mustard** **Celery** Choose an allergen **Cereals containing gluten** **Milk** **Soya** **Sulphur dioxide and Sulphites** Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	**Organic, non GMO (maize, soya) 'Beter Leven Kenmerk'**
Product recalls in last 12 Months	**No**
Products in production at the time of the audit	**"Cordon Blue ham production date 13-09-2016**

6.Audit Duration Details

On-site duration	**16 man hours**	Duration of production facility inspection	**8 man hours**
Reasons for deviation from typical or expected audit duration	**NA**		
Next audit type selected	**Announced**		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	**2016-11-22**	**09:00**	**17:00**
2	**2016-11-23**	**09:00**	**17:00**

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

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref. clause 1.1.9)				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
General Manager	x		x	x
VION Food Nederland and	x		x	x
Quality Manager	x	x	x	x
Quality Assurance Assistant		x	x	
/ Procuction Manager	x	x		x

HR-Manager	x		x	x
New Product Development			x	
Foreman cutting department		x		
Operator Cooking line, smoking Department		x		
Receipt		x		
Maintenance		x		
Industrial Department		x		
Employee Curing Department		x		
Expedition / Slicing		x		

Non-Conformity Summary Sheet

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

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

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	2.7.3	In the HACCP analyse there are several product groups available. For each group there is a risk analyse available and out of this risk assessment (C) CP are implemented. During the assessment it is noticed that for one product(group) (ready to eat bacon / breakfast bacon) the actual CCP's (CCP 3, Fermentatieproces or CCP 4 "pasteurisatie, roken en napasteurisatie) are not the correct CCP's (Because smoking/cooking is maximum 58 C (In CCP 4 procedure (P-NCB-NL-10050 revisie 9 6 okt 2016) is standing : minimum 3 minutes > 70 C and in CCP 3 (P-NCB-NL-10055 revisie 10 25 okt 2015) is standing pH < 5,30. On both of these criteria	A new CCP is implemented: in every batch the amount of nitrite in the brine and the amount of injected brine in the meat is checked.	RCA: This wasn't mentioned by the quality department before. PAP: The procedure is implemented. The form on which the controls should be written is ready. The 'procesbeheersplan' is changed, the new CCP is added.	On site verification on 06-12-2016 and new documentatie for the new CCP (Nr. 4). Fully Closed	2016-12-06	Date Reviewed 2016-12-06 2016-12-14

		this product group is not check (or are relevant parameters). Because of this and the missing of the risk analyse on this point it is a Major NC.					

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
2	2.7.1	In the flow diagram is standing the production of bacon-rind but in the "procesbeheersplan (P-NCB-NL-10190/P-NCB-NL-10027 revisie 18 23-11-2015" this process is not standing. It is clear that after the production of bacon-rind this material is used within the own organisation and that there are still CCP available for the produced end product.	The complete 'procesbeheersplan' is reviewed.	RCA: the link between the flow diagram and 'procesbeheersplan' is not clear. PAP: the steps in the process of 'production of bacon-rind' were already in the 'procesbeheersplan', but not clearly identified. The 'procesbeheersplan' is reviewed. The numbering of the steps in the 'procesbeheersplan'	Seen new procesbeheersplan included bacon rind : P-NCB-NL rev. 10027 revisie 22 dated 14-12-2016 and P-NCB-NL-10190 revisie 9 and 5 dec 2016. Fully Closed	2016-12-06	Date reviewed 2016-12-06 2016-12-14

				is coupled to the steps in the flowcharts.			
3	3.5.2.1	On receiving of raw material it is noticed that one of the parameters of the product was not conform the specification. No motivation is available why this product is still accepted.	The procedure of blocking products is reviewed and only the quality department may unblock products.	RCA: it was not clear who was authorized to release blocked products. PAP: blocked products can only be unblocked by the QA department, with a motivation why the product is unblocked.	Seen new procedure F-NCB-NL-10007 Revisie 12 dated 5-12-2016. Closed : point will be followed up the next BRC evaluation	2016-12-06	Date reviewed 2016-12-06 2016-12-14
4	4.2.2	On day one the security employees where not working conform the procedure for entering of external prosomal to the site. If the auditor wants it was possible to enter the production without escort of the company.	The HR manager of Encebe has reinstruct the porter.	RCA: the procedure which was available was not followed by the porter. PAP: together with Vion Boxtel a new procedure is being written, to prevent this from happening.	Seen mail and communication about the working method of the porter. On day 2 of the audit and by the onsite following up (6-12-2016) it was correct. Fully closed	2016-12-06	Date reviewed 2016-12-06 2016-12-14
5	4.9.3.1	It is noticed that several dolafs are damaged. This is not noticed during the receiving of those dolafs.	We have added an extra control point on the form of receiving goods.	RCA: the control wasn't effective enough PAP: On the form (F-NCB-NL-10021) an extra control point is	During the onsite following up this point was correct. Fully closed	2016-12-06	Date reviewed 2016-12-06 2016-

				added.			12-14
6	4.7	One blue belt of the slicer (nr. 1) is damaged an and risk for contamination of the sliced product was possible. A new belt is al ready ordered.	A new belt is placed on slice nr.1.	RCA: a new blue belt for the slicer nr. 1 was already order by the technical department, but too late to prevent the risk of contamination. PAP: on the SSOP list of the slicing department soft plastic is one of the control points.	During the on site following up this point was correct (new belt is placed). Fully Closed	2016-12-06	Date reviewed 2016-12-06 2016-12-14
7	5.6.1.1	A monitoring program (P-Food-1008 revisie 11 13 May 2015) is available. One of the parameters is the testing on listeria on bacon products. It is noticed that there were no actual results (conform the monitoring program) on listeria available.	The quality department is already started to follow the procedure.	RCA: because of the amount of different product groups and different parameters, one parameter in this group was missed in the last monitoring. PAP: a frequency schedule with all the product groups is made for 2017, see attachment 8.	During the onsite following up this point was correct. (analyse is done and new schedule is seen). Fully Closed	2016-12-06	Date reviewed 2016-12-06 2016-12-14

Comments on non-conformities

Voluntary Modules Non-Conformity Summary Sheet

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

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

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

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The by Mr. General Manager, signed Management Review (2015/2016) (09-2016) shows a good working Quality Management System.
Clear objectives are part of the Management Review (MR), concerning quality, hygiene and complaints. They are monitored monthly. Complaints on foreign body (plastic) are still an issue. Several improvements projects (eg. A3 verbeterplan on foreign bodies) are ongoing 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.
Internal communication is conducted by daily white board (Hurdle/Tier) meetings with all employees. Several samples of this type of communication seen and discussed with the responsible department manager. A good system of presenting issues like (product) quality, improvement actions and complaints seen.
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 MR contains the relevant review subjects (objectives, complaints, verification and validation of the management system, CCP control, PRP control). Plan is to do the review on a quarterly base instead of once a year.
There is an organisation with short communication lines (effective) and a direct control of the production by the management. Communication (Procedure Overlegstructuren P-NCP-NL-10006) is conducted by:

- White board communication (Hurdle Tier boards); concerning quality issues (VOS version 2)
- MT-meeting once per week;
- PPD-meeting & HACCP team meetings once per 4 weeks;
- Employees meeting once per year;

The General Manager attends the opening and closing meeting. All intensions were discussed during the opening meeting with the General Manager Mr.

Root causes of the 4 minor non-conformities of the last BRC audit have been identified. The NC's did not reoccur.

1.2 Organisational structure, responsibilities and management authority

The organisational structure is clear and part of the QMS (P-NCB-NL-10008 revisie 18 8 nov 2016.. The various production departments directly report to the production-manager. The production manager is member of the MT. 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 description.

Details of non-applicable clauses with justification

Clause reference	Justification
NA	

2 The Food Safety Plan – HACCP

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 HACCP team, namely General Manager, QA Manager, Quality Assurance Assistant, Production Manager and team leader. All team member's shows enough and the right experience and knowledge.

Flow diagrams are prepared and available in . All process steps were shown. Verification is done yearly. 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.

In the flow diagram is standing the production of bacon-rind but in the "procesbeheersplan (P-NCB-NL-10190/P-NCB-NL-10027 revisie 18 23-11-2015" this process is not standing. It is clear that after the production of bacon-rind this material is used within the own organisation and that there are still CCP available for the produced end product. (Minor NC)

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 >=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 13-01-2015.
- Summary Allergens and CCP's

CCP' s which are determined, including critical limits, according to P-NCB-NL-10027 dd 13-01-2015:
- CCP 1. Temperature control of (returned) fresh pork meat / beef at reception (≤7°C)
- CCP 2. Temperature control of (returned) animal by-products/organs at reception (≤3°C)
- CCP 2. Temperature control of regular meat at reception (≤2°C)
- CCP 3. pH after fermentation process (pH≤5,3 within 45 and 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)

In the HACCP analyse there are several product groups available. For each group there is a risk analyse available and out of this risk assessment (C) CP are implemented. During the assessment it is noticed that for one product(group) (ready to eat bacon / breakfast bacon) the actual CCP's (CCP 3, Fermentatieproces or CCP 4 "pasteurisatie, roken en napasteurisatie) are not the correct CCP's (Because smoking/cooking is maximum 58 C (In CCP 4 procedure (P-NCB-NL-10050 revisie 9 6 okt 2016) is standing : minimum 3 minutes > 70 C and in CCP 3 (P-NCB-NL-10055 revisie 10 25 okt 2015) is standing pH < 5,30. On both of these criteria this product group is not check (or are relevant parameters). Because of this and the missing of the risk analyse on this point it is a Major NC.

Critical limits have been defined for each CCP and are related (if applicable) to the legal temperature requirements for meat and meat products. CCP monitoring has been defined and documented.

Corrective actions are clearly defined according to the CCP overview. The CCP's were demonstrated, including a well recording during the audit, including corrective actions. Verification during the year is demonstrable. Several reports seen.

Each employee involved was trained. Records of CCP monitoring and verification show measurements are carried out by authorised persons as planned.

Details of non-applicable clauses with justification

Clause reference	Justification
NA	

3. Food safety and quality management system

3.1 Food safety and quality manual

The company has a quality manual, complying with ISO 9001 and BRC 7, 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 (dated 18 may 2016), over system procedures, working procedures, work instructions, registration documents. An electronic quality manual named '/ ' or ' ' is in place and available to departmental managers.

3.2 Documentation control

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.

3.3 Record completion and maintenance

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.

3.4 Internal audit

There are detailed schedules of internal audit against documented procedures, carried out by trained independent staff (from the VION company). All departments are included in the plan. The audit is done twice a year. One unannounced and one announced audit. The audits have been carried out to schedule (May & Nov 2015) and corrective action has mostly been taken in a timely manner. In addition, hygiene audits and site / building inspections are performed at monthly intervals.

Assessed: Announced audit report 31-10-2016 (AM-064-AUD-24).

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

All suppliers of products have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL). Approval is on base of a questionnaire and a GFSI certificate and or an audit.

Suppliers performances are well monitored and followed up. 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 and microbiological performance (meat suppliers).
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.
Risk assessment on Food fraud is done by Vion Central and implemented in the risk assement of

ENCEBE.

3.5.2 Raw material and packaging acceptance and monitoring procedures

All suppliers of products have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL). Approval is on base of a questionnaire and a GFSI certificate and or an audit.
On receiving of raw material it is noticed that one of the parameters of the product was not conform the specification. No motivation is available why this product is still accepted.(Minor NC)

3.5.3 Management of suppliers of services

All suppliers of services have to be approved. Purchasing and supplier approval is a corporate quality department responsibility (at VION central office – VION Food NL).

Suppliers performances are well monitored and followed up. 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.

3.5.4 Management of outsourced processing and packing

No primary product processes are outsourced.

3.6 Specifications

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, eg:

- End product "Cordon Bleu ham kal. 35 (dated 21 okt 2014)
- Raw material "aardappelzetmeel" 23 nov 2016
- Vliessnippers ham 23 nov 2016
- Food safety declaration belt 01-2009
- Food safety declaration new equipment "rookworst snijder" dated 17-10-2016

Top belt Slice department line 5 19-05-2010

3.7 Corrective and preventive actions

Corrective action systems is based upon the information from internal audits, SSOP, pre SSOP, hygiene audits, pest control, non-conforming product, complaints etc. Action plans (overviews) are in place.
For daily actions the hurdle white boards system is used.

3.8 Control of non-conforming product

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). Direct action towards non-conforming products was clearly demonstrated during the audit.

3.9 Traceability

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.
Suppliers are approved by Vion Central bases on audits and approval for a GFSI approved system. Also questionnaires are used.

Test for recall and traceability at least annually: performed on 10 nov 2016, including mass balance, for final product to raw material.
A vertical test with documentation (records), during the audit was tested for a delivery "Cordon blue ham kal. 35" production date 13-09-2016
Fast tracing (forwards/backwards, including packaging) was possible within the records.
Information was available within time.
Mass balance, for raw material to final product was oké
End specification available (dated 21 okt 2014)
Raw material specification (aardappelzetmeel and vliessnippers ham" dated 23 nov 2016 (printdate)
Trainingrecords CCP okt/nov 2016

3.10 Complaint handling

The procedure for complaint handling defines types of complaints and addresses requirements in terms of incident 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.
Assessed:
Overview of complaints 2016. Regarding to food safety, foreign body (plastic and metal) is the major part of the complaints.
The Management focuses on reducing foreign body complaints. Actions are taken such as:

- the introducing of the hurdle system to improve daily communication with employees about quality and safety issues
- projects eg the A3 improvement project, reducing the use of blue plastic in production

In general appropriate actions to clients, internal organisation and / or suppliers seen.

Seen complain nr. 136 (31-10-2016) food safety complain and nr. 146 moulds on outside of product dated 11-11-2016 with on both complain good evaluation and reaction.

No complaints from the authorities.

3.11 Management of incidents, product withdrawal and product recall

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.

3.12 Customer focus and communication

Most articles are Private Label articles. This means that products are developed on the basis of customer specifications. So products are developed in close consultation with the customer. After testing the costumer gets an advice for e.g. BB period and important quality and food safety issues. PD and QA are involved in these processes. Further personnel are instructed were necessary. Were applicable suppliers are contacted.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.4	No primary product processes are outsourced.

4. Site standards

4.1 External standards

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 built around the building.

4.2 Security

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).

On minor NC is raised on this point: On day one the security employees where not working conform the procedure for entering of external prosomal to the site. If the auditor wants it was possible to enter the production without escort of the company.

4.3 Layout, product flow and segregation

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".
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

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

The fabric and internal condition of the site was suitable and satisfactory for the process. Walls, ceilings and floors were mostly suitable. No direct product contamination seen. The 'high-care' area does contain several departments of which only two departments are equipped with a positive air pressure ventilation system.

4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good degree.
The water used for cleaning and process is mains water ( ). 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.
Compressed air is used for equipment and to clean. Oil used in the system is food approved (seen specification 02-05-2013
Steam comes in direct contact with products. The steam is supplied by Vion. One food grade additive is used in the steam (seen specification oxygen binder 01-02-2010 & 21-10-2015 confirmation from Vion this is still the actual version).

4.6 Equipment

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.

4.7 Maintenance

Equipment is maintained and on the planned maintenance system. Maintenance is also outsourced to established companies within the food and meat business. Registrations to confirm that the preventive maintenance or preventive controls have been carried out as planned are in place.

Assessed:

"Smeerschema" wk 12 2016
Specifications: Grease FM 222 (used at the stopmachine pletmachine dd 29 aug 2016 (NSF).

Generator ( ) klima 103 dated 10-10-2016

During the audit it is noticed that : One blue belt of the slicer (nr. 1) is damaged an and risk for contamination of the sliced product was possible. A new belt is already ordered. (Minor NC)

4.8 Staff facilities

There were suitable changing rooms for staff. The rooms are sited to production. Separation in work wear and personal clothing/items is arranged. 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.

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.

4.9 Chemical and physical product contamination control

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

In production areas regular foreign body checks are done on products and semi-finished products ("conformiteits controles" seen various records of such checks during the audit).

4.9.1 Chemical control

Control over cleaning chemicals on site was demonstrated. Separate storage facility for cleaning chemicals in place. Authorised access by cleaning company (and production department. available and specifications confirm suitability for use in food processing industries.

4.9.2 Metal control

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. During the audit the correct working of several metal detectors was checked.

4.9.3 Glass, brittle plastic, ceramics and similar materials

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. Daily hygiene audits by production department (pre-SSOP and SSOP) include glass / hard plastic. Glass / hard plastic audits regularly carried out by department management (4 x / year).

During the audit t is noticed that several dolfs are damaged. This is not noticed during the receiving of those dolafs. (Minor NC)

Assessed: Glass/Hard plastic audit d.d 12-09-2016; OK

One incidents is reported:

- 10-11-2016 (plastic damage of a plastic measuring cup (no risk for product contamination)

4.9.4 Products packed into glass or other brittle containers

No products packed into glass or other brittle containers

4.9.5 Wood

Wooden pallets are not permitted in production, but clearly used at the end of the packing line; no risks to product as all products are fully packed.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Metal detection in processes.

4.10.2 Filters and sieves

Not applied.

4.10.3 Metal detectors and X-ray equipment

Metal detection in processes.

4.10.4 Magnets

Not applied.

4.10.5 Optical sorting equipment

Not applied.

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

Cans are checked at receipt.

4.11 Housekeeping and hygiene

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. **Assessed:**

Listeria 2015 R&D Agar results 2016 (positive, handled well) **OK**, "Pre SSOP overzicht 2016" score OK and "SSOP overzicht 2016" score OK

4.11.7 Cleaning in place (CIP)

Not applied.

4.12 Waste / waste disposal

A set of types of waste are defined. Correct collection and identification was demonstrated. Legal handling of categorised meat is collected by a licensed company or pet food application. Seen Cat. 3 note dated 22-11-2016.

4.13 Management of surplus food and products for animal feed

Cat 3 material is held separately and cooled. Legal handling of categorised meat is collected by a licensed company for pet food application.

4.14 Pest Control

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. And assessment on the Pest control system and a Pest risk inventory 1x / year (Frequency of the in-depth pest control survey is risk based and accepted). All documentation is present in the contract map of (digital). Up to date site plans (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: Visit reports 22-10-2016 no remarks.

On total location Non Tox is used

4.15 Storage facilities

Internal storage in separated cold stores and freezer. Control of temperatures was established including temperature alarm settings. Finished products are transported to a distribution centre ( ). General handling procedure and temperature control is applicable during storage and loading of raw materials and products. No outside storage applicable.

4.16 Dispatch and transport

Dispatch and release of products is based upon general handling procedures. Checks are recorded. 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. VION Food (central office) is contract owner. The content of the contract complies with the requirements. VION reviews the performance of these transport companies (eg).

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5	No High Risk area
4.3.7	No ambient High Care area
4.5.3	No unpotable water used
4.8.4	No High Risk area
4.8.5	No ambient High Care area

4.9.4	No products packed in glass
4.10.2	No sieves in the processes
4.10.4	No magnets in the processes
4.10.5	No optical sorting equipment
4.11.7	No CIP

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.
The system guarantees that all relevant departments as QA, production etc. are involved where required in R&D projects.
Allergen policy is part of the product development process and changes are discussed in the HACCP team. Assessed:
– system "Kattenspek" (PDI proces)

5.2 Product labelling

The product labels are defined by R&D in cooperation with Vion group and private label owners where applicable. The EU 1169 has been implemented.

5.3 Management of allergens

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.

5.4 Product authenticity, claims and chain of custody

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. Organisation adapted also the chain of custody principals and is approved for "Beter leven keurmerk.

5.5 Product packaging

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.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

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.

- Pasteurized and packed products: every 4 weeks 3 microbiological analyses;
- Pasteurized and sliced products: 1 x / week 5 microbiological analyses;
- Fermented products: 1 x / week 5 microbiological analyses.

It is noticed during the audit that A monitoring program (P-Food-1008 revisie 11 13 May 2015) is available. One of the parameters is the testing on listeria on bacon products. It is noticed that there were no actual results (conform the monitoring program) on listeria available. (Minor NC)

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: "Trend analyse Microbiologie 2016"

Product (organoleptic) test is conducted after each production batch.

5.6.2 Laboratory testing

All analyses are subcontracted to an accredited laboratory operating in accordance with ISO 17025:

5.7 Product release

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.

Details of non-applicable clauses with justification

Clause reference	Justification

6. Process control

6.1 Control 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. 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 starts up checks are applied. All CCP check's where demonstrated during the audit. Essential equipment for CCP control and the weighing devices were calibrated.

6.2 Labelling and pack control

During the production only the label involved is present on the line. (No consumer label is added).

6.3 Quantity, weight, volume and number control

All products are sold by weight. Metrology controls the balances for commercial purpose. The devices are tested internally on a daily basis. No issues identified. Calibration of the scales is demonstrable using standard weights. Records were available.

6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated. Critical measuring equipment are thermometers (CCP related) and weighing scales. Calibration with 2-monthly frequency (thermometers CCP), 6-monthly frequency (other thermometers) or yearly frequency (balances,) is adequate according to the calibration records. No adjustments are possible. Assessed:

- Calibration planning 2016 (incl. results Thermometers CCP 1/2, seen 339241161808 dated 10-10-206)
- pressor meters (for sterilisation) done 4-7-2016 (serienr. 880470 E07)
- Calibration on smooking equipment (nr. 18) done on 18-02-2016
- Calibration on smooking equipment (nr. 19) done on 22-02-2016

Details of non-applicable clauses with justification

Clause reference	Justification

7. Personnel

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

There 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). Checked for several employees if they are trained for their job, working with a CCP and personal hygiene.
Assessed: Files Temporary worker & : "vragenlijst voedselveiligheid en hygiëne" & exam OK done on 10-11-2016

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

The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel prior to commencing work. These hygiene rules are effectively enforced. Well detailed hygiene rules are documented and signed by employees. Checked for temporary workers (1x) and own employees (3x). 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 clean room. Medicine use is set at the hygiene rules.

7.3 Medical screening

The medical screening is part of the intake of new employees and part of the instructions to visitors. The site makes all visitors, new starters and contractors aware of the need to report infectious disease via the 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.

7.4 Protective clothing: employees or visitors to production areas

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. 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.

Details of non-applicable clauses with justification

Clause reference	Justification

Module 8 - Traded Goods

Scope
8.1 Approval and performance monitoring of manufacturers/packers of traded food products
8.2 Specifications
8.3 Product inspection and laboratory testing
8.4 Product legality
8.5 Traceability

Module 9: Management of Food Materials for Animal Feed

Scope	

9.1 Management Commitment

9.2 HACCP

9.3 Outsourced Production

9.4 Specifications

9.5 Traceability

9.6 Chemical and Physical Product Contamination Control

9.7 Labelling
9.8 Training

Module 11: Meat supply chain assurance

Scope	

11.1 Traceability
11.2 Approval of meat supply chain
11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species
11.5 Product testing
11.6 Training