Audit Report

Global Standard for Food Safety Issue 7: July 2015

1.Audit Summary			
Company name	**Vleesindustrie Valkenswaard BV**	BRC Site Code	**1960265**
Site name	**Vleesindustrie Valkenswaard BV**		
Scope of audit	**Cutting to specification and packing in bulk packaging of pork**		
Exclusions from scope	**None**		
Justification for exclusion	**N/A**		
Audit Finish Date	**2016-12-13**		
Re-audit due date	**2018-01-18**		

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

2. Audit Results					
Audit result	**Certificated**	Audit grade	**AA**	Audit type	**Announced**
Previous audit grade	**AA**	Previous audit date	**2016-01-12**		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	4

3.Company Details

Address	**De Vest 6, 5555 XL Valkenswaard**		
Country	**The Netherlands**	Site Telephone Number	**+31 88 9953000**
Commercial representative Name		Email	**@vionfood.com**
Technical representative Name		Email	**@vionfood.com**

4.Company Profile

Plant size (metres square)	**< K sq.m**	No. of employees		No. of HACCP plans	**1-3**
Subcontracted processes	**No**				
Other certificates held	IKB				
Regions exported to	**Europe** **Asia** Choose a region Choose a region Choose a region Choose a region				
Company registration number	**NL341**				
Major changes since last BRC audit	**None**				

Company Description

Vleesindustrie Valkenswaard is part of VION Food Group, an international meat company with production plants in The Netherlands and Germany and sales offices all over the world. The plant produces lard, barding fat and fat cubes out of pork backs which come from other VION plants (Scherpenzeel, Emsteck) and Italian slaughtering houses. In production two cutting lines exist and products are packed mostly in plastic containers to be frozen. Products are not intended for delivery to consumer but for industry to be used in food products. The company employs currently employees (in majority Polish) who work mostly daytime from Monday to Friday. Total plan site ca. M2 and there

is 1 HACCP study available. The majority of instructions and forms are translated in Polish and a few employees are assigned as translator during meetings and training courses.
The quality system is (, the general VION system in which Forms and Procedures are controlled and maintained.

5.Product Characteristics

Product categories	**01 - Raw red meat** Category Category Category Category Category
Finished product safety rationale	**Raw product, cooled and frozen, to be heated.**
High care **No** High risk **No** Ambient high care **No**	
Justification for area	**Product is to be heated or treated by customer**
Allergens handled on site	**None** Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	**IKB, QS, VVM, BL***
Product recalls in last 12 Months	**No**
Products in production at the time of the audit	**Pork backs cutted into rind, lard and fat cubes**

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 **For the system part 8 hours was also a lot of time because it is a system used for every location of Vion and I am performed the BRC audits on more Vion locations. Because of those reasons 16 hours is the right duration for this location.**	**Because this is a small company and the risk is small the total audit time is not 18 hours but 16 hours. I spend 8 hours in the production and I see every part of the production twice also look for cleaning and standing still in production for over 1,5 hour to look to every process and system for working.**		
Next audit type selected	**Announced**		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	**2016-12-12**	**09:00**	**17:00**
	2016-12-13	**09:00**	**17:00**

	Auditor (s) number(s)	Names and roles of others
Auditor Number		**(Lead auditor)**
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)	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Name / Job Title				

/ Production Manager	X			X
/ QA Manager	X			X
/ Purchase and Sales Manager			X	
Reciept and expedition manager		X		
Foreman Production		X		
/ Production employee		X		
/ Prod. employee (administration)		X		
Financial Controller			X	
/ Maintenance manager		X	X	

Non-Conformity Summary Sheet

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

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

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

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	2.12.1	In Q3 2016 report is standing that the target for the CCP deviations is maximum 15 this is not a realistic target because until now no CCP deviation are reported.	In the report the target of CCP temperature is changed to 0	The target was a standard in the Vion-template of Q3 This was by accident not removed in the template. In the Q4 report the	Seen new target in Q4 report dated 05-01-2016. Fully Closed	2017-01-09	

				target has been changed. See attachment.			
2	3.2.1	In locker (etiketten afdeling) where old specifications available who were not under the control of the document system.	The document were removed from the locker and are destroyed	The documents were replaced on base of the corrective report of 12 January 2016. The employee didn't knew that it was allowed to throw them away. Preventive action: We told the head of the "uitlegafdeling" how to replace documents.	This is corrected immediately during the audit.Seen by the auditor. Fully Closed	2017-01-09	
3	4.9.2.1	In processing seen that a "aanzetstaal" and knife where to lie on process equipment	The employee has been told that he needs to put his knife into the knife-holder	There is an knife-holder in the area.	Seen picture of the knife-holder. Fully Closed	***2017-01-09***	
4	4.9.3.2	Glass in production is broken / this is not seen during the Pre SSOP SSOP and glass control inspection.	This is reported to the maintenance. The maintenance has put foil on the glass so that there is no risk for the products.	The window was from the beginning broken (2011). This is reported to the maintenance. The maintenance has put foil on the glass so that there is no risk for the products.	Seen minutes of the meeting here the date for replacement is planned (2017-01-21) Closed : point	***2017-01-09***	

				That's the reason this is not reported any more in de SSOP and glass-control . The glass will be replaced as soon as possible	will be followed up the next BRC evaluation.		

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

Senior management is engaged and committed. Policy is stated and communicated in dated 2016-07-01 including objectives partly new and partly derived from previous objectives.

Scope is not changed although NVWA has issued acknowledgement for production of salted products. This is not seen during the audit.

Management review of 2015/2016 is showed constructed out of periodical monthly reports including al obligate items. One objective is on alignement of management with the VION structure conform l management by presenting objectives in an . Other objectives on introduction of lard-emulsion, microbiology, cleaning, new sales.

Management is also HACCP-team and meets weekly, seen weekly minutes of 25-10-2016 (VOS tier 1 aspecten). This is altered with previous years as the QA manager is available on site only one day per week.

1.2 Organisational structure, responsibilities and management authority

Organisation structure is stated in a from the HR department ', displaying the structure and the names. Production related tasks are plotted in a chart (.xls) to display training needs and give a good overview of competencies required and competencies available.
Because a greater part of the workforce is not native Dutch speaking several employees are assigned as translator during meetings and training courses. Also key instructions and forms are translated in several languages (Dutch, English, German, Polish).

Details of non-applicable clauses with justification

Clause reference	Justification

2 The Food Safety Plan – HACCP

The HACCP system is documented in and is based on the Codes Alimentarius. The hazard and risk analysis is in line with the Group procedures were the decision tree and intended use are

prescribed. Also in this procedure (I .) all microbiological, physical, chemical hazards are displayed in different tables leading to a risk category.
One CCP exists covering the temperature at receipt of incoming (or returned) goods to be less as 7 °C. No exemptions possible (I 22-03-2016 revisie 9).. This is documented in I "Proces-beheersplan" were also 23 CP's are mentioned. Meaning that all relevant hazards are discussed and identified and relevant control measures are in place. Reassessment of the HACCP-plan is part of the managementreview (Juni 2015/juli 2016.) In managementreview is standing a target for the amount of CCP deviation on Maximum 15 this is not realistic (Until now ' 2016 no deviations are observed on this CCP. (Minor NC)
Flow diagrams are -00013, -00014, -00015, -00036 and include all relevant processes.
HACCP team is also the management team formed by Plant manager, Maintenance manager, QA manager, Financial Controller, Sales officer, Production foreman, Expedition Manager.
Validation of the switch to backsaver by validation team including QA manager (Seen report of validation 11-11-2016) and Group QA manager headquarter.

Details of non-applicable clauses with justification

Clause reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

Electronic quality manual is up to date on the general VION systems named . It is accessible for key personnel with internet connection. The system automatically generates verification of procedures and forms. Also on information is kept as there "Snittenboek" is published managed by headquarters but input from operating companies.

Records are kept and retrievable as prescribed in

3.2 Documentation control

The online system is adequate and effective. In all procedures, instructions and forms are kept, relevant to the company relating QA. HR has its own manual.

In locker (etiketten afdeling) where old specifications available who were not under the control of the document system. (Minor NC)

3.3 Record completion and maintenance

All records are collected by the production administration and digitalised and archived. Data are analyses for trends and displayed in the quarterly management review conform system of HQ.

3.4 Internal audit

An internal audit program is made by HQ and the plan of 2016 was executed.

The last internal audit was performed by on 21-11-2016 in which 4 nc's were found. Verification has taken place, also on non conformities from former audits. Conformity is reported by usage of annexes corresponding with requirements from standards applied (eg BRC, CoC)

Internal auditors are found throughout all VION operating companies and in and these are trained (by LRQA) and experienced.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

Risk assessment from in (see also the vulnerability study) is done by VION Food Group in Boxtel were VION Scherpenzeel and VION Emsteck are seen as internal deliveries. The Italian suppliers and deliveries are classed in category with low risk as these are all slaughtering houses and deliveries directly from these slaughtering houses.
) seen the questionnaire signed 4-11-2014, company is BRC certified. (Each supplier has signed questionnaires)
Each delivery is calculated on quality and quantity and reports on supplier performance exist.

3.5.2 Raw material and packaging acceptance and monitoring procedures

On RF-VIV-NL-10003 is recorded the CCP of incoming raw materials. Incoming packaging materials are recorded on form F-VIV-NL-10041.

3.5.3 Management of suppliers of services

Freezing storage and some transport is seen as service but not within the scope because this is responsibility of VION Food Group.
All service supplying companies are monitored and results are recorded in S-MMI-10199 for approved transporting companies and S-MMI-10011 for approved cold storage companies. And in S-MMI-10013 for

other service suppliers.

3.5.4 Management of outsourced processing and packing

No outsourced activities

3.6 Specifications

On website exits "Snittenboek" on which all raw materials and finished products have a specification form. Product in the traceability test was with spec F-NLFood-11074 dated 21-06-2013.

Also a signed spec of bac fat is signed by supplier on P-VIV-NI-10001.

Specifications on packaging materials, lubricants, equipment is kept by the maintenance manager.

3.7 Corrective and preventive actions

On each form the corrective measure is predescribed. Seen forms on cleaning control on which communication with cleaning company is reported. (F-VIV-NL-10034 in 5 tabs per department filled in per day). Seen forms on metal detection (F-VIV-NI-10027) and forms on receipt (CCP).

3.8 Control of non-conforming product

In the freezing department there is a corner available to place returned goods. Retuned goods are reported and controlled conform F-VIV-NL-10039. Also there is procedure concerning non conforming and deviating products P-VIV-NL-10002.

Bigger issues are up scaled and to be treated conform the VION Food Group system: P-VION-10005.

3.9 Traceability

On 23 aug 2016 the yearly test was held to examine procedures. Also evaluation is included. There is no rework to be handled and returns goods do not return into production. During this audit a trace was held on delivery of kg of from coming in at 29-08-2016. All information was available, mass balance is included and also specifications and records were retrievable.
Seen also:

- Procesmonitoring CCP (29-08-2016)
- Monitoring of outgoing product
- Incomming product (F-VIV-NL-00003 revisie 8)
- Specification packaging material : (DOC 19-10-2015)
- Proces beschrijving productspecification F-NLFood-10074 (revisie 1 21-06-2012)
- CMR incomming product 1270651 26-08-2016)
- Massabalance done (correct)
- SSOP (F-VIV-NL-10024) week 35 2016

3.10 Complaint handling

Complaint handling and analysing is demonstrably and documented P-VIV-NL-10010. System is not connected to the VION Food Group system. Also a system for supplier complaints is made to record and verify suppliers. Seen complain 11-07-2016 temp of product delivery (-1 must be -15) and one time foreight bodies 20-09-2016.

3.11 Management of incidents, product withdrawal and product recall
P-VIV-NL-10045 is on recall and crisis. Centrally is used P-VION-10015. Test is done on 23 aug 2016. Mass balance is included.
3.12 Customer focus and communication
New and amended product customer requirements lead to new specifications. No alterations to specifications are made. Seen in logistical software the 10 product orders in article number ( ) in which new articles are developed and finally are accepted in "Snittenboek".

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.4	No outsourced processing

4. Site standards

4.1 External standards

The production site is suitable for its purpose. Some external storage of cask is outside out of sight External area is paved with concrete and stones and a sea carrier is used for external storage of maintenance equipment and surplus machinery.

4.2 Security

Cameras are in use covering inside and outside. Entrance is for authorised personnel only and only accessible during certain hours of the day (until 6.15h). Visitors are registered and informed on house rules and hygiene rules. P-NLFOOD-10007 is the general VION procedure including the registration form to record visitos on. drivers do also acknowledge on the visitors form.

4.3 Layout, product flow and segregation

Factory layout is described in P-VIV-NL-10004 and is spacious and orderly. Areas are low risk and enclosed product areas.

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

In 2011 the factory as completely stripped and all machinery was moved in again. A logical sequence and orderly process flow is the result. Due to Japan productions some alterations are made in conveyor routing. Doors, walls, floors and drainage are suitable. If any condensation might occur, strict actions to be taken exists.

4.5 Utilities – water, ice, air and other gases

Utilities are in responsibility of the maintenance department. Water is controlled by an external laboratory, results are available. Waterplan is described in "Plan met tappunten" P-VIV-NL-10011. Seen water analyse (cleaning water), 07-07-2016 (Tappunt).

4.6 Equipment

In P-VIV-NL-10083 "Messenregime" a method is described how to act in case of missing equipment or knives. Special tool box to be used by used by production operators is in place, with 15 pieces of tools. Most equipment is stainless steel.

4.7 Maintenance

There were no temporary repairs seen during the audit. Maintenance is done after production and machines are moved mostly to the workshop for repair. Clearance for production is marked by a card.

F-VIV-NL-10001 records the repairs during production and the communication between maintenance and production on cleaning and clearance.

In software ' a weekly planning is made on maintenance activities. List is published and refreshed weekly. All machinery, equipment and activities concerning the maintenance department are included. Supervision is done by the maintenance manager.

4.8 Staff facilities

No entrance to production is possible without washing and disinfecting hands and footwear. Changing facilities are provided gender specific and toilets are segregated. All clothing is packed and stored until usage in a separate room, lockers only contain work shoes and private items. Work shoes are placed on a mat which is refreshed weekly.

4.9 Chemical and physical product contamination control

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

Contamination control is done 4x/ year on a 4 pageform and records the inspection of P-VIV-NL-10023. Also the containers for product storage are checked and failure is recorded. Wooden pallets are not allowed in production area only at department receipt/dispatch.
No product is packed into glass and the upper and lower parts of the fat, the trimmings are packed into crates.

4.9.1 Chemical control

Approved chemicals are divided in chemicals for maintenance and chemicals for cleaning. Both are listed and approved and on form "Overzicht smeermiddelen" updated on 11-2016, 6 lubricants are listed. Seen (Food grade).

4.9.2 Metal control

Several procedures apply to control metal, as the tool box of production is in place, counting of knifes and hygiene clearance after maintenance. But in processing seen that a "aanzetstaal" and knife where to lie on process equipment (Minor NC).

4.9.3 Glass, brittle plastic, ceramics and similar materials

Product is not packed into final consumer pack.

All glass windows are protected with foil, and a procedure is in place to exclude containers with damages or broken. A glass reister is in place to record all places were glass or brittle plastic and similar materials can be found. But :a windowglass in production is broken / this is not seen during the Pre SSOP SSOP and glass control inspection. (Minor NC)

Seen glass control list 29-11-2016

4.9.4 Products packed into glass or other brittle containers

na

4.9.5 Wood

na

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

The company uses a metal detector on request of customers; it is a CP (not CCP). Two adjustment are possible depending on the examined product. The metal detector is tested with sticks of 7,0 mm Fe, 10 mm non-Fe and 10 mm SS 304. Records are shown no incidents past year was recorded on F-VIV-NL-10027

4.10.2 Filters and sieves

na

4.10.3 Metal detectors and X-ray equipment

On dispatch all frozen, in crate packed material is unpacked and undergoes metal detection. All other finished product is no tested, as approved by customer.

4.10.4 Magnets

na

4.10.5 Optical sorting equipment

na

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

na

4.11 Housekeeping and hygiene

Records are available of daily cleaning and housekeeping (SSOP: F-VIV-NL-10020 and pre-SSOP F-VIV-NI-10030). An external company performs daily cleaning and communication, records and methods are available. The plan is dated aug 13 and specifications of all used chemicals are available.

Each week agar test are done by production employees and reported on F-VIV-NL-10044. The temperature of the water in the tank for cleaning purposes is set to 40°C.

4.11.7 Cleaning in place (CIP)

na

4.12 Waste / waste disposal

There are several waste categories and each is treated separately. Cat3 material (08-12-2016): Fat: ; Plastic and other waste is removed by . No obsolete waste or violations seen. All product fallen is treated as waste.

4.13 Management of surplus food and products for animal feed

Cat3 material in disposed of to which can become animal feed.

4.14 Pest Control

VION Food Group has an overall agreement with VIV was included in 2016 (from april 2016). The online monitoring system is adequate and gives a plan on toxic/non toxic baits and also reports activity per bait and actions instigated by the pest controller. Once a year 22-04-2016 verifies the system with the maintenance manager and 8x a year there is a regular monitoring on mice and other rodents. 4x a year the fly killing devices are monitored and results are trended. Seen reports in 2016 of: 09-09-2016 / 21-09-2016. The in-depth surveys are yearly (last reported on 22-04-2016 and this year there was a quality assessment done ass well. This timeframe is confirmed as in the quality assessment the risk category is set to low. One infests inside last year (a rat (drops) is seen and several actions are done (Prevention and extra traps are placed). At the moment of the audit it is under control. And no tox is used anymore.

4.15 Storage facilities

Storage facilities are for empty containers, for frozen and cooled products. Temperature is controlled by a digital system with logical critical temperatures and delay times for alarm. History of detected alarms is

present and history of recorded temperatures is also present. P-VIV-NL-10046.

4.16 Dispatch and transport

All transport is arranged by customer or transport is organised by VION Food Group centrally for supply from and dispatch to cold storage in . Vehicles are monitored on arrival and dispatch. Traceability is kept on goods by labelling information converted to CMR/Vrachtbrief. All goods are weight, temperature controlled. Gezien (03-10-2016).

Details of non-applicable clauses with justification

Clause reference	Justification
4.2.3	No external storage
4.3.5	Only low risk areas
4.3.6	Only low risk areas
4.3.7	Only low risk areas
4.3.9	No temporary structures
4.4.4	Only low risk areas
4.4.13	Only low risk areas
4.5.3	No non-potable water
4.8.4	Only low risk areas
4.8.5	Only low risk areas
4.9.4	Products packed in flexible plastic
4.9.5	Products packed in flexible plastic
4.10.2	No filters and sieves applied

4.10.4	No magnets applied
4.10.5	No optical sorting equipment applied
4.10.6	No rigid containers are applied
4.11.7	No CIP applied

5. Product control

5.1 Product design/development

Product development is executed centrally in Boxtel at headquarters. At present there is a test on the production of fat emulsion, a development on which production manager is participating. This new process is in development for several years now and managed by the R&D manager in Boxtel.

If customer require different cuttingsizes or alterations in packaging, this is not seen as product development. Each new or altered article becomes a new article number.

5.2 Product labelling

A new procedure is made to control labelling: P-VIV-NL-10054. All lard is labelled conform specification closing the package. Each new label is glued on form F-VIV-NL-10032 and each consequitive label wit another date is glued on F-VIV-NL-10035.

5.3 Management of allergens

NA

5.4 Product authenticity, claims and chain of custody

Several chain flows are in place (FS, QS, IKB). Chains are canalised and colour coded (FS) as described in F-VIV-NL-10016.

5.5 Product packaging

Plastic foil between and around the product is used in direct contact. Labelling is done with EG labels, product labels and pallet labels. There is no consumer packaging. Crates are monitored and packaging material is stored in two places both on the first floor. Traceability of packaging material is recorded on F-VIV-NL-10041.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

There is no laboratory present on the premises only a small stove is available in the office. Products are weight, measured (thickness) and microbiological tested according a plan. There is a microbiological planning available for 2016 meeting the procedures of VION Food Group and legal demands of ' of 2016 is executed and reviewed in the reassessment of managementreview. Also quarterly reports in QA report. There are made 6 product groups to make better trends. (with and without rind).

5.6.2 Laboratory testing

All laboratory testing is arranged by headquarters and is outsourced to he web based system in was not available during the audit due to technical problems. Result up and including Q4 were available in printed form.

5.7 Product release

No positive release is in place.

Details of non-applicable clauses with justification

Clause reference	Justification
5.3	No allergens identified on site
5.7.1	No positive release applied

6. Process control

6.1 Control of operations

Control of operation is done according the food safety plan. Documented procedures and instructions are in place and monitored and verified. Weighing and measuring devices are monitored and calibrated periodically according procedures. P-NLFOOD-10135.

Back fat is accepted and sorted to size and thickness by colour coding and then transported to the next department. There toplayer is separated from rind and larding fat. Larding fat is transported to the cutting department were is placed, packed and labelled as required. Toplayers and rind is also packed and crates are labelled. All is weight before leaving the production area.

6.2 Labelling and pack control

Labelling on crates is on date, article and size. Labelling on lard is on packed product according new labelling procedure P-VIV-NL-10054. All lard bcomes three labels: EG-label, tracelabel and production employee label.

6.3 Quantity, weight, volume and number control

All product leaving the production department is weight on the floor scale. Tarra weight is calculated so production efficiency can be measures. The employee responsible for the weighing has a designated task and cannot leave the shift until all issues are solved.

6.4 Calibration and control of measuring and monitoring devices

Three weighing scales are calibrated each year by [illegible] ([illegible]). Seen certificate 1609262739 (vloerweegschaal serienr. [illegible] en hangweegschaal serdienr. [illegible] (kalibration done on 2-09-2016). [illegible] thermometers [illegible] serial number [illegible] is calibrated once a year, other thermometers are measured 6x per year on F-VIV-NL-10038 by maintenance manager. Serial number [illegible] and [illegible] (CCP monitoring) calibration doen on 7-9-2016 are in use in production and prove of calibration is presented. Seen calibration on [illegible] of the cooling equipment done on 4-1-2016 (once a year) All equipment is present in the maintenance software schedule.

Details of non-applicable clauses with justification

Clause reference	Justification

7. Personnel

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

Training plan made for 2016 is recently presented including external courses. (because of financial constraints and mature workforce, low training effort is seen).
New workers are educated before commencing activity in production. Many records of training and instruction were presented. Seen records of one of the production employees audited during production audit. Competence matrix "Functiematrix" does not include yet the latest training on labelling on which 9 persons were trained on the new labelling procedure on 30-6-2016. Attendance records are available (F-VIV-NL-10040)
Yearly a HACCP in-depth training for key personnel is conducted (with Dutch-Polish translators), on 30-11-2016 including pest control measures.

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

Hygiene procedures and instructions are clear, executed, monitored and verified. P-FOOD-10017 is revised on 12-1-12 and all records were past that date. They are available in several languages and communicated throughout the company. There is no misunderstanding on the rules and the regime is strict and suitable. In P-VIV-NL-10042 bezoekersreglement P-VIV-NL-10044 opleidingsplan, details can be found.

7.3 Medical screening
Medical screening is monitored at every new worker and every 5 years due to international trade rules (export to Japan, Korea, Singapore). A physician is updating records on request. Timescales are kept by Human resource manager.
7.4 Protective clothing: employees or visitors to production areas
Protective clothing is worn by everyone entering production facilities. Hair caps for everyone and beard caps for persons with beards. Several gloves are available depending on which work to perform (blue, white, fabric, plastic). Shoes or shoe caps are available. All jckets trousers are packed in plastic to keep clean until usage. Clothing is changed regularly and before entering the canteen the jacket is to be taken off. Washing of clothes is done by

Details of non-applicable clauses with justification

Clause reference	Justification
7.4.4	Only low risk areas
7.4.5	Only low risk areas

Module 8 - Traded Goods
Scope
8.1 Approval and performance monitoring of manufacturers/packers of traded food products
8.2 Specifications
8.3 Product inspection and laboratory testing
8.4 Product legality

8.5 Traceability

Module 9: Management of Food Materials for Animal Feed

Scope
9.1 Management Commitment
9.2 HACCP
9.3 Outsourced Production
9.4 Specifications

9.5 Traceability
9.6 Chemical and Physical Product Contamination Control
9.7 Labelling
9.8 Training

Module 11: Meat supply chain assurance

Scope
11.1 Traceability

11.2 Approval of meat supply chain

11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training