



Lloyd's Register
LRQA

SD 016 Global Standard for Storage and
Distribution Issue 2: September 2010

BRC GLOBAL STANDARDS
THE WORLDWIDE STANDARDS OF CHOICE

Audit Report

Standard - Global Standard for Storage and Distribution Issue 2: September 2010

Audit Result: CERTIFICATED

Audit Frequency 12 months

Company Details	
BRC Site Code : 9884029	
Company Name : Distrifresh B.V.	
Site Name : Distrifresh B.V.	
Address: van Salmstraat 64, Boxtel	
Country : The Netherlands	Postcode : 5281 RS
Telephone : +31(0)411617617	Fax : +31(0)411617600
Company Representative Name :	
Email : info@distrifresh.com	

Additional locations included
Address : None

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

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Audit Report

Certification Body Details	
Name of Certification Body : LRQA Ltd	
Auditor Number (only one - team leader)	Auditor Names (lead assessor)

Audit Start Date: 2016-04-13

Audit Finish Date: 2016-04-14

Re-audit Due Date : 2017-04-17

Previous Audit Date: 2015-03-31

Scope Details	
Activities :	01 - Storage 02 - Distribution 06 - Contracted Services Contract Packing 07 - Contracted Services Quantity Control Inspection 09 - Contracted Services Contract Containers Select an activity Select an activity Select an activity
Product Categories	Storage/Distribution
	01 - Chilled and Frozen Food
	Select a product category
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Scope of Audit: Reception, storage, labeling, order picking and distribution of pre-packed meat and other foods, under chilled or deep frozen conditions. Storage and cleaning of food containers and pallets.

Exclusions from Scope None

Key Personnel

Name/Job Title	Present at Audit (x)			
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.8)				
- Site Manager	x		x	x
- (central) QA Manager	x	x	x	x
controller)	x			
(Facilities manager)	x	x	x	x
- Head TD	x	x	x	X
- Human resource officer			x	X
- Supervisor emballage	x	x	x	X
- ass supervisor labeling line		x		
reception) supervisor (packed food)	x	x	x	X

Company Profile

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Distrifresh B.V. in Boxtel belongs to the Vion Food Group and is member of the multisite ISO9001:2008 certification of the group in The Netherlands.

Distrifresh B.V. is situated since 2007 on this site en is specialized in storage, weighing and labeling, order picking and distribution of pre packed meat and food products, all temperature controlled (mainly chilled or deep frozen). Activities are executed as a service to their clients. Modules 1, 2, 6, 7 and 9 are relevant. There is a local MT with 6 members (is also the HACCP-team). Most jobs comes from Vion Retail Nederland. Routes of transport are planned intercompany and/or to the contracted retailers. Raw meat is packed in bins (e.g. packed pork parts). Also some wholesale packaging and small consumer units for raw meat, meat products or other food products in retail packaging are on site.

An extra service is done for washing of plastic bins (dolavs) and (plastic) pallets and is facilitated in a separate building.

All trailers (about) are managed under own responsibility, are hired from . The road trucks are subcontracted from 4 transport companies. All the Distribution activities are managed by Distrifresh BV, in cooperation with the Vion Food Group.

There are (FTE) employees working in 1-3 shifts. This includes (FTE) of temporary workers.

Storage/operations facilities are about 13.000m2 and the building for storage and cleaning of crates is about 1600m2.

Site was built about 40 years ago, suitably finished, no re-building in recent years. A modern digital order picking system is implemented and if needed labeling of final packed consumer products is executed over 6 weighing and labeling lines. Equipment is installed 8 years ago. Extra camera's and fences were installed in 2012 for site security; also secured entrance with batch logging.

The company is certificated for organic (Skal) and ISO 9001:2008 in a multisite certification by Vion Food Nederland. Beside NVWA legal veterinary registration (NL607EG), there are no other recognitions or certificates relevant for this standard.

More information see: www.distrifresh.com

Audit Duration Details

Total site a audit duration 12 man hours

Time auditing the site and vehicles 6 man hours

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Reasons for deviation from typical or expected total audit duration
none

Audit Duration per day		
	Start time	Finish time
Day 1	9:00	17:00
Day 2	9:00	13:00

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Audit Report NON-CONFORMITY SUMMARY SHEET

List of Non Conformities

Critical

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Revisit date

Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Evidence provided Document Photograph Visit/Other	Reviewed by

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Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Evidence provided Document Photograph Visit/Other	Reviewed on 2015-4-18 by
1	4.2.2	On the left side of the building, where emballage is stored and cleaned, an outside door (emergency door) was not secured/locked. Risk for unallowed entrance was not minimized.	<p>Root cause: the door is only to be used as an emergency door. The emergency doors are locked on the inside of the building and can't be opened from the outside. This particularly door was already opened from the inside during the day of the audit.</p> <p>The emergency doors are connected to the central alarm system, but this is only applicable for the doors in the production area.</p> <p>Proposed action plan: Reinstruction to the staff, not to open the emergency doors. The technical department will investigate the possibilities to connect the emergency doors in the emballage hall also to the alarm system. Until this is realized, the closing of the doors is weekly checked during the SSOP check.</p>	F-DFS-NL-10037 Monitoring CP's.	2016-05-09. Fully closed.

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2	4.4.11	<p>The method to guide the labelled products at the end of several labelling lines needs more attention. Some roles to press the last action stickers were not in good condition. Old damaged stickers were seen on these roles. No inspection check is implemented for this.</p>	<p>Root cause: The department made the rollers smoother with blank labels, to press the product labels better on the consumer package. These blank labels where not in a good condition during the audit. At the end of the labeling line an employee checks all the packages. No packages with damaged labels are send to the customer.</p> <p>Proposed action plan: The technical department is investigating the possibilities to replace the current rollers with smoother rollers. A sample is received and tested at this moment. The labeling line is weekly checked for old labels during the SSOP check.</p>	F-DFS-NL-10037 Monitoring CP's Pictures of Rollers.	2016-05-09. Fully closed.
3	6.5.1	<p>Several plastic containers (200 l) to collect waste from paper and plastic were not sufficient clean. In and outside some containers was grey dirt visible. These containers were missing in the documented cleaning plan.</p>	<p>Root cause: Containers are only used to collect waste (plastic, paper and labels), no contact to products or packages is possible. Therefore not part of the cleaning plan.</p>	Waste containers F-DSF-NL-10021 Jaarplanning schoonmaak	2016-05-09. Fully closed.

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4	7.2.3.	<p>One of the activities is cross docking for the transport trolley cars (with packed final products) of the client). It was noticed that the trolleys were not cleaned in a sufficient way. Several old stickers (also with the name of De Groene Weg) were not removed in full. A GHP/GMP aspect.</p>	<p>Proposed action plan: Containers are cleaned directly after the audit. Cleaning plan is modified, containers will be cleaned every month.</p> <p>Root cause: The trolleys are used to transport crates with pre-packed meat and food. There is no risk for product contamination. The transport trolleys are used by different suppliers, for different customers. Everyone has their own way of labeling and cleaning the trolleys.</p>	Trolleys checks.	2016-05-09. Fully closed.
5	7.5.3.	<p>On site there is a small storage room for deep frozen products. Incidentally some frozen product (porc loin rib 7 in a 10 kg box;) is distributed as a chilled product as agreed with one client. It was not demonstrable what the shelflife is after defrosting. Label information ("shelf life is limited after defrosting!") was not sufficient and no</p>	<p>Proposed action plan: We will check the trolleys we receive from supermarkets and suppliers and remove old, readable labels.</p> <p>Root cause: This product is mostly wanted in the weekends, but then not enough available. Vion Retail Nederland has agreed with the customer to store the product deep frozen, till delivery to the customer. This way there is a bigger stock by the end of the week. The product is delivered to the</p>	Frozen products labeling.	2016-05-09. Closed.

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	<p>productspecification was demonstrable (because during the audit it was not possible to have contact with the responsible person of VION).</p>	<p>customer as a chilled product, at a temperature below 7°C.</p> <p>Proposed action plan: At the day of delivering to the customer, the box is labeled with the shelf life of a fresh product (7 days).</p>	
6	16.7	<p>Root cause: The weekly check for the absence of disinfectant was changed from a pH check to a check with indicator paper. And so instead of a value (number), the employee responsible for monitoring had to fill in an observation (correct of not correct). This was not clear.</p> <p>Proposed action plan: Directly after the audit is this non-conformity discussed with the employee responsible for monitoring the CP's. After modifying the registration form, she is instructed again on 2th May.</p> <p>The CP checks the last weeks are added to this action plan (see 'CP checks of last weeks.pdf'). The result of the test is <u>always</u> filled in at the</p>	<p>CP checks of last weeks.</p> <p>Reinstructon monitoring CP's</p> <p>2016-05-09.</p> <p>Fully closed.</p>

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Storage and Distribution

1. Senior Management Commitment

Summary

In the opening meeting the Site Manager told about the new developments and showed commitment to the implementation of BRC S&D.
 In the written policy there is evidence that human and financial resources are budgeted. Several indicators about process or f.i. delivery performance have been monitored. The objectives are clear, measurable and documented.
 The management review was carried out annually till july 2015. Now the review is performed every 3 months. Also every 3 month an evaluation of the (HACCP) plan and system is demonstrable.
 Communication lines are described in a overview, related to all relevant departments, including Management. In HACCP-team (MT-team, members) meetings results from f.i. hygiene and internal audits are communicated to the staff. Seen minutes of March 2016, action list included. There is an English original copy of the Standard present.
 The Site Manager Operations was present at the opening and closing meeting during this re-certification.
 The updated organisation chart was seen: March 2016.

No nonconformities were identified for this chapter.

1.1	Y	1.1.3	Y	Y	1.1.6	Y	1.1.9	Y	1.2.2	Y
1.1.1	Y	1.1.4	Y	Y	1.1.7	Y	1.2.0	Y	1.2.3	Y
1.1.2	Y	1.1.5	Y	Y	1.1.8	Y	1.2.1	Y	1.2.4	Y

N/A Clauses

No.	Justification

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2. Hazard and Risk Analysis

Summary

A fully implemented HACCP-system, committed by senior management, carried out by a multi-disciplinary team, lead by the Plant Manager, is documented, as a result of the risk analysis, based on the principles of the Codex Alimentarius. Used was legislation, hygiene codes and branch information.

A pre-requisite programme has been defined as part of the hazard analysis, corresponding to the pre-requisites in practice.

Further a hazard analyses (based on the central Vion system) per process step, from intake, storage till dispatch; for physical, chemical, microbiological and allergens were mentioned and judged. Control by several prerequisites (f.i. cleaning, maintenance, pest control).

One CCP was determined for the control of product temperature when received, as a result of the carried out risk analysis, controlled in practice according to limits according to legislation.

CCP; temperature products at intake (limits depending on the kind of product; 2 , till 7°C)

Part of validation is a review of the hazard and risk analysis in case of new product types.

The system has been reviewed annually according to schedule and part of the Management Review.

2.0	Y	2.3	Y	2.6	Y	2.9	Y	2.12	Y
2.1	Y	2.4	Y	2.7	Y	2.10	Y	2.13	Y
2.2	Y	2.5	Y	2.8	Y	2.11	Y		

N/A Clauses

No.	Justification

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3. Quality Management System

Summary

The complete management system has been documented, available for the staff by intranet. Central organized procedures, in addition with local procedures/working instructions. All documented in the system. Documents are effectively controlled. Reasons for changes are adequately recorded. Documents are evaluated on a yearly bases resulting in a new document version.

Internal audits are performed once a year and carried out by trained auditors. Records are kept about conformity; actions for non-conformity are carried out. In addition inspections were carried out for hygiene/premises. Non conformities were raised and adequately rated. Monitoring was seen in action lists. NC's are verified.

Customer requirements (mainly labelling/logistic items) are defined under responsibility of Business Development and implemented in working practices and the system, under responsibility of the supervisor. Delivery performance/just in time/complaints is monitored related to customer satisfaction.

Purchase; the methods and frequency of assessment of supplied services has been defined and carried out. Approvals were carried out for f.i. pest control, house keeping of offices, washing clothes and maintenance.

A tracing system is in place to trace products from intake, storage till dispatch. The system is based on bar codes at intake and own bar codes of the Distrifresh system till best before date or lot number at labelling. A recall and traceability test was carried out.

During the audit was tested; " ; received on 14/03/2016 crates with packed organic bacon tht 27/5/2016. All were delivered in orders to clients in 4 days. A fast tracing forwards/backwards was demonstrated in the system/records.)

Incident management/business continuity; several procedures are in place related to management of crisis situations.

Non conforming product/damages/returns are stored according to a documented procedure, in a separated marked room.

The complaint procedure was explained. A good analysis is made. Last 3 months 40 incoming complaints were registered (based on 230.000 outgoing articles per week!). 1 x wrong label , 1 x damaged pack and all others were about manco's. No food safety items were registered.

Complaints are actively used in discussions in meetings for improvement.

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3.1.1	Y	3.2.3	Y	3.5.1.1	Y	3.7	Y	3.9.2	Y
3.1.2	Y	3.2.4	Y	3.5.1.2	Y	3.7.1	Y	3.9.3	Y
3.1.2.1	Y	3.3	Y	3.5.2	Y	3.7.2	Y	3.9.4	Y
3.1.2.2	Y	3.3.1	Y	3.5.2.1	Y	3.7.3	Y	3.9.5	Y
3.1.2.3	Y	3.3.2	Y	3.5.2.2	Y	3.8	Y	3.10	Y
3.1.2.4	Y	3.4	Y	3.5.2.3	Y	3.8.1	Y	3.10.1	Y
3.1.3	Y	3.4.1	Y	3.5.2.4	Y	3.8.2	Y	3.10.2	Y
3.1.3.1	Y	3.4.2	Y	3.6	Y	3.8.3	Y	3.10.3	Y
3.1.3.2	Y	3.4.3	Y	3.6.1	Y	3.8.4	Y		
3.2	Y	3.4.4	Y	3.6.2	Y	3.8.5	Y		
3.2.1	Y	3.5	Y	3.6.3	Y	3.9	Y		
3.2.2	Y	3.5.1	Y	3.6.4	Y	3.9.1	Y		

N/A Clauses

No.	Justification

4. Site and Building Standards

Summary

Suitably located, rather large building and adequately equipped; making a logical and safe way of processing possible. No influence from the industrial surroundings. Site security: risks are identified; a system for reporting is available. Site security is mentioned in the company rules, training of staff regarding to site security was explained. Facilities for site security are installed; barriers, closed doors, reception and batch logging. Security not in full control (NC for one unsecured door in emballage department)

Suitable design and lay out in the process from intake, storage, labelling, order picking and transfer/dispatch. No items regarding to (possible) contamination also due to the pre packed products.

Suitable battery charging room, storage of chemicals. Closed dock levellers are present.

Well designed, constructed and maintained areas/storage facilities; walls, floors, ceilings. Tap water for cleaning, adequate protected lightning and protected glass.

A minor NC was raised for the hygiene of the label line.

Monitoring carried out by QA/Operations, followed by actions discussed in meetings.

Sufficient suitable staff facilities are present. Suitable hand washing facilities, although no loose food has been handled. Water to be used for crate washing is analysed for potability.

Separated, suitable catering facilities are present.

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4.1	Y	4.2.2	N	4.3.6	Y	4.4.6	Y	4.5.2	Y
4.1.1	Y	4.2.3	Y	4.3.7	Y	4.4.7	Y	4.5.3	Y
4.1.2	Y	4.3	Y	4.4	Y	4.4.8	Y	4.5.4	Y
4.1.3	Y	4.3.1	Y	4.4.1	Y	4.4.9	Y	4.5.5	Y
4.1.4	Y	4.3.2	Y	4.4.2	Y	4.4.10	Y		
4.1.5	Y	4.3.3	Y	4.4.3	Y	4.4.11	N		
4.2	Y	4.3.4	Y	4.4.4	Y	4.5	Y		
4.2.1	Y	4.3.5	Y	4.4.5	Y	4.5.1	Y		

N/A Clauses

No.	Justification

5. Vehicle Operating Standards

Summary

Company manage the trailers under own responsibility. All have facilities to control temperature (chilled and/or frozen). Trailers are not bought (not own property) but subcontracted/hired, some with the company Logo.

Dispatch by own personnel and/or drivers. Also possible for intercompany jobs "transport only."

Drivers for the trucks in front of the trailers are subcontracted (4 professional companies) and trained conform the rules of Vion, Distrifresh and clients. So H 5 requirements are relevant for the activity of Distrifresh by the trailers.

5.1	Y	5.1.5	Y	5.2.2	Y	5.3.3	Y	5.4.4	Y
5.1.1	Y	5.1.6	NA	5.2.3	Y	5.4	Y	5.4.5	Y
5.1.2	Y	5.1.7	Y	5.3	Y	5.4.1	Y	5.4.6	Y
5.1.3	Y	5.2	Y	5.3.1	Y	5.4.2	Y		
5.1.4	Y	5.2.1	Y	5.3.2	Y	5.4.3	Y		

N/A Clauses

No.	Justification
5.1.6.	No vehicles operated with hoses and pumps.

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6. Facility Management

Summary

Adequate maintenance for electrical internal transporters and cooling installations are planned demonstrable. Inspections are carried out by Maintenance department and contractors. Advised repairs are carried out and recorded. Calibration is mainly subcontracted, carried out, according to a planning. E.g. for the balances in line to weight.

Carried out calibration by Distrifresh was demonstrable for 4 thermometer devices (CCP-monitoring).

Cleaning carried out according to schedules, carried out well, with suitable chemicals and monitored. Recording is appropriate, but for the CP5 some registrations were missing. See minor NC. Not recorded daily inspections are carried out.

Adequate systems for collection, collation and disposal of waste, including destruction of category 3 materials. (meat waste).

Pest control has been contracted since 2 weeks to . A record system was shown, according to a contract for at least 8 visits a year. Trends are analysed. There is no pest problem.

One minor NC is raised for cleaning the internal waste containers for collection of paper and plastic.

6.1	Y	6.2.3	Y	6.3.5	Y	6.4.6	Y	6.6.2	Y
6.1.1	Y	6.2.4	Y	6.3.6	Y	6.4.7	Y	6.6.3	Y
6.1.2	Y	6.2.5	Y	6.3.7	Y	6.5	Y	6.6.4	Y
6.1.3	Y	6.2.6	Y	6.4	Y	6.5.1	N	6.6.5	Y
6.1.4	Y	6.3	Y	6.4.1	Y	6.5.2	Y	6.6.6	Y
6.1.5	Y	6.3.1	Y	6.4.2	Y	6.5.3	Y	6.6.7	Y
6.2	Y	6.3.2	Y	6.4.3	NA	6.5.4	Y		
6.2.1	Y	6.3.3	Y	6.4.4	Y	6.6	Y		
6.2.2	Y	6.3.4	Y	6.4.5	Y	6.6.1	Y		

N/A Clauses

No.	Justification
6.4.3	No CIPI

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7. Good Operating Practices

Summary

Goods are received from Vion Retail or external customers and inspected at reception; f.i. visual (damaged packaging), inspection of the loading compartment and product temperature (CCP). During the audit this CCP was well explained including corrective actions, if needed. Additional requirements of customers about temperature are adequately fulfilled.

Six temperature controlled areas are present for the products, monitored with proper alarm settings, including the freezer (assessed at the maintenance department). Very good temperature control assessed.

Suitable facilities to avoid contamination of products were seen. Glass/brittle procedures (PDSFNL10014) are present. Check rounds are carried out. There are some allergen containing products handled/stored; all pre-packed. Extra attention was made in case of damaged packaging; categorized waste and cleaning.

Stock rotation according procedures, based on FiFo and best before date, including the system for product release.

One Minor NC was raised for the hygiene of the transport trolleys of the
And one NC for stock rotation in case of defrosting.

7.1	Y	7.2.2	Y	7.3.3	NA	7.4	Y	7.5.2	Y
7.1.1	Y	7.2.3	N	7.3.4	Y	7.4.1	Y	7.5.3	N
7.1.2	Y	7.2.4	Y	7.3.5	Y	7.4.2	Y	7.6	Y
7.1.3	Y	7.3	Y	7.3.6	Y	7.4.3	NA	7.6.1	Y
7.2	Y	7.3.1	Y	7.3.7	Y	7.5	Y	7.6.2	Y
7.2.1	Y	7.3.2	Y	7.3.8	Y	7.5.1	Y		

N/A Clauses

No.	Justification
7.3.3	No controlled atmosphere other than in packages
7.3.4	No potential risks identified

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8. Personnel

Summary

Employees (including temporary employees) are trained, instructed and supervised under the responsibility of Supervisors, with extra attention to personnel who are engaged in activities to the CCP. A training matrix was seen. Training is on the job.

Trainings performed for handling CCP's.

CCP registrations seen for training of ' ' and for

Part of the general training are read working instructions. (signed for acceptance and understanding).

A yearly review was carried out about the competences in relation to carried out activities per function/employee. (job description was assessed for assistant supervisor.

No handling with open food.

8.1	Y	8.1.4	Y	8.2.3	Y	8.2.7	NA
8.1.1	Y	8.2	Y	8.2.4	Y	8.2.8	NA
8.1.2	Y	8.2.1	Y	8.2.5	NA	8.2.9	NA
8.1.3	Y	8.2.2	Y	8.2.6	NA	8.2.10	NA

N/A Clauses

No.	Justification
8.2.5- 8.2.10	No additional requirement since no open food is present.

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Wholesale Module

9. Purchasing – Branded Products

Summary

No wholesale activities.

9	NA	9.1.2	NA
9.1	NA	9.1.3	
9.1.1	NA		

10. Requirements for the purchasing and management of wholesaler own brand products and Wholesaler exclusive brands.

Summary

No wholesale activities.

10.1	NA	10.2.1	NA	10.2.5	NA	10.3.2	NA	10.4.3	NA
10.1.1	NA	10.2.2	NA	10.2.6	NA	10.4	NA		
10.1.2	NA	10.2.3	NA	10.3	NA	10.4.1	NA		
10.2	NA	10.2.4	NA	10.3.1	NA	10.4.2	NA		

Contracted Services Module

11. Contractual Arrangements

Summary

Contracted services for Vion and external customers () are demonstrable. Details were communicated to QA (for risk assessment per process step) and Operations. (Assistant) Supervisors are trained in details, under responsibility of the supervisors. Details about f.i. labelling products available for Employees by photos on their monitors. Control of the stock of some articles from (e.g.) was assessed (location). Tracing test for Organic spekblokjes : tht 27/05/20016.

11	Y	11.3	Y	11.6	Y
11.1	Y	11.4	Y		
11.2	Y	11.5	Y		

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12. Product Inspection

Summary

No contracted services regarding to product inspection.

12	NA	12.3	NA	12.6	NA
12.1	NA	12.4	NA		
12.2	NA	12.5	NA		

13. Contract Packing (Repacking, Assembly Packing)

Summary

Contract packing exists of weighing and labelling meat products. Risk assessment has been carried out for this process step. Products are delivered to the labelling department with bar coded crate labelling and printed with the required information on labels supplied by the customer. Information to be printed on the labels, f.i. weight, ingredients, organic, best before date conform the original best before date from the bar code. The tested traceability system is based on the bar codes and internal labelling.

Details about f.i. labelling products available for Employees by photos on their monitors.

13	Y	13.3	Y	13.6	Y	13.9	Y
13.1	Y	13.4	Y	13.7	Y	13.10	Y
13.2	Y	13.5	Y	13.8	Y		

14. Quantity Control Inspection

Summary

There are some contracted services regarding to quantity control inspection. Weight is/can be printed on the labels. No "e"-sign.

14	Y	14.3	Y	14.6	Y
14.1	Y	14.4	Y		
14.2	Y	14.5	Y		

15. Contract Chilling/Freezing/Tempering and Defrost Operations

Summary

No contracted services regarding to Chilling/Freezing/Tempering and Defrost Operations. Only incidental a very little chilled transport of a (recent) deep frozen article, conform wish of the client.

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15	NA	15.3	NA		
15.1	NA	15.4	NA		
15.2	NA				

16. Contract Cleaning of baskets, roll cages and other distribution containers

Summary

The organisation execute the facility for cleaning and disinfection of bins (dolavs) and pallets. The operation facility was visited and found adequate. Except for the registration of the check of absent chemicals (CP5). See minor NC.

16	Y	16.3	Y	16.6	NA
16.1	Y	16.4	Y	16.7	N
16.2	Y	16.5	Y		

N/A Clauses

No.	Justification
16.6	No operation of automated devices.

17. Waste recovery and recycling

Summary

No contracted services regarding to Waste recovery and recycling.

17	NA	17.3	NA	17.6	NA
17.1	NA	17.4	NA	17.7	NA
17.2	NA	17.5	NA		

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