Audit Report **Global Standard Food Safety Issue 9**

1. Audit Summary			
Company name	Vion Boxtel BV	Site code	1768974
Site name	Vion Boxtel BV		
Scope of audit	The slaughtering of pigs, the deboning, cutting to specification, slicing, packing in bulk, bag in box, consumer packaging of pork meat (fresh, vacuum packed, modified atmosphere, chilled). Production and packing in bulk of mechanically separated meat.		
Exclusions from scope	None		
Justification for exclusion	non-applicable		
Audit start date	2025-08-12	Audit finish date	2025-08-15
Re-audit due date	2026-11-13	Head office	Yes

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
Choose a module	Choose an item		
Choose a module	Choose an item		

2. Audit Results					
Audit result	Certificated	Audit grade	A+	Audit programme	Unannounced – mandatory 1 in 3 years
Previous audit grade	AA		Previous audit date	2024-11-05	
Certificate issue date	2025-09-25		Certificate expiry date	2026-12-25	
Number of non-conformities			Fundamental	0	
			Critical	0	

2. Audit Results

	Major	0
	Minor	7

3. Company Details

Site address	Boseind 10 5281 RM Boxtel		
Country	The Netherlands	Site telephone number	
Commercial representative name		Email	
Technical representative name		Email	

4. Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	>1500	No. of HACCP plans	1-3

Shift pattern	2 shifts Monday/Friday, five days a week	
Seasonal site	No	
Seasonal opening times (Start/end date)	Click or tap to enter a date.	Click or tap to enter a date.
Other certificates held	ISO 9001, IFS PIA, BLK, IKB, QS, SQMS,	
Outsourced processes	No	
Outsourced process description		

4. Company Profile	
Regions exported to	Europe Asia North America Oceania Africa Choose a region
Company registration number	NL61 EG
Major changes since last BRCGS audit	'No changes'

Company Description

Vion Boxtel BV is part of Vion Food Group and privately owned.

The production capacity is slaughtering to 95 000 pigs per week and a production of 98 tons of products. All pigs are bred by Dutch farmers and majority reared conform the Good Farming principles (IKB); a part of them is also reared regarding special Welfare demands (Good farming *).

The plant is equipped with two slaughter lines with a maximum capacity of 17000 pigs/day that operate in two shifts. The chilling of the carcasses is realized through spray tunnel (1,5 hour), mild chiller 2,2ºC and cooling cell 3ºC within 17 hours to a temperature below 7ºC. Organs are chilled in tunnels within 3 hours to a temperature below 3ºC. Around 15000 carcasses are processed daily in cutting (line speed 11000 p/h), deboning (11 lines) and middles (8 lines) departments. Conveyor lines for KJ crates with chip are used for the majority of Internal logistics of products from middles/deboning/cutting departments to areas with packaging machines. The packaging equipment is modern with the ability for metal detection of the product packaged in primary or secondary packaging.

The factory building is well maintained (old and new part 2020) with a covered area m2 on two floors. Second floor (changing rooms, canteen, packaging materials warehouse, carcass room, Wash crates area). In 2022 the reception area for pigs was renewed.

There's a 2-shift pattern in most departments. The total number of employees is (fixed and temporary employees). Most of them are temporary workers (hired via contracted agencies) from East European countries such as Poland, Romania and Bulgaria. There are interpreters and job coaches in the company for communication purposes.

Main customers are industrial meat processing companies in Europe, Asia, USA and Australia. Snit hams are particularly produced for Spain and Italy. Vion Boxtel is approved by authorities for export of pork meat to several third countries (e.g. Japan, Korea, Russia, Canada, Africa, China, Australia)

Produced products are chilled: carcasses, main parts (fore-end, middle, ham), refined parts, trimmings, organs and mechanically separated meat. Packed in bulk (dolavs, crates on pallet), bag in box, vacuum packed and flow packed in cardboard box, modified atmosphere (dolavs).

Centrally managed processes are: a) establishing strategy and mission; b) developing and maintenance of procedures for the main processes; c) create, review and update product specifications, customer specifications and packaging label specification; d) sales and customer contact; e) management of

4. Company Profile

suppliers and approval (farms, non-food goods, services); f) generic HACCP assessment, Food Defense and Food Fraud assessments. The HQ processes are not audited separately for BRC and integrated in the audit of the site Managing System.

The audit was performed unannounced on site.

The company has chosen for voluntary fully unannounced audits for the coming years.

5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category Category Category Category Category
Finished product safety rationale	Chilled red meat (up to 7 °C)/ up to 2 °C), short shelf life 5-8 days and chilled red meat vacuum / MAP packed, short shelf life 14-21 days, DMM <2 days. Intended use: further preservative treatment before it is fit for human consumption.

High care	No	High risk	No	Ambient high care	No

Justification for area	Slaughtering, evisceration, cooling, cutting, packaging areas of raw meat is low risk, products are not ready to eat, intended use: further preservative treatment before it is fit for human consumption. These hygiene zones are in place: 1. highly contaminated areas, where only one way of movement is possible from clean to dirty area; and 2. low risk zone – white/clean area where the processed meat is handled. It is ensured, that the air and water from contaminated zones do not stream to the clean areas.
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

5. Product Characteristics	
	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	GF=IKB; GB= Welfare Approved
Product recalls in last 12 months	No
Products in production at the time of the audit	Pork from carcasses and cut to the technical and customer specification (main parts: fore-end, middle, ham; refined parts; trimmings (70/30 and 80/20, spareribs), organs mechanically separated meat. Packed in bulk, bag in box, vacuum packed, foil packed (wrapped) in carton boxes, modified atmosphere bulk packed.

6. Audit Duration Details			
Total audit duration	32 man hours	Duration of production facility inspection	16 man hours
Reasons for deviation from typical or expected audit duration	None		
Combined audits	None		
Next audit type selected	Unannounced - Voluntary		

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 1.1.11)					
Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
	Plant manager	X			X
	Plant manager	X			X

	QA manager	X	X	X	X
	Assistant quality manager	X	X	X	X
	Human resource manager	X		X	X
	Production manager slaughter area	X	X	X	X
	Maintenance			X	X
	Production manager packing area	X	X	X	X
	Employee quality assurance		X	X	
	Cutting dep.		x	x	
	Empl. cutting		x		
	Verdedeling		x		
	Ass. voorman		x		
	Line Maintenance		x		
	Voorman		x		
And many more.. employees/	Teamleaders/employees.		X	X	

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2022-06-16	BRCGS Food Safety	Unannounced	Pass
2023-11-16	BRCGS Food Safety	Announced	Pass
2024-11-05	BRCGS Food Safety	Announced	Pass

Document control	
CB Report number	RQA9832737 / 7189840

Template name	F908 Food Safety Audit Report Template		
Standard issue	9	*Template issue date*	2022-12-16
Directory allocation	Food	*Version*	1.1

Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
Clause	Detail	Critical or Major	Re-audit date

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

f

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
4.4.10	Condensation was seen under the ventilation equipment in area where the organs are packed. The ventilation was not fully adequate at that moment of startup, no organs were on the line jet at that moment.	The condensation sweeper has finally removed all the condensation. ***Closed to be verified on site***	The condensation sweeper and the supervisors have been re-instructed, with the procedure and the instruction. **See attachment Condens**	The condensation sweeper did not pay proper attention to where the condensation was present and this was not noticed by the supervisors either.	*2025-09-12*	
4.7.2	The white protective plate on top of the bone press (DMM processing) was damaged which can cause contamination of the bones by foreign bodies arising from the plastic protective plate. No demonstrable specific interval was planned for inspection of this protective plate.	The loose parts were immediately removed from the damaged plate. ***Fully Closed***	A periodic maintenance is performed in to check whether any damages are caused. This plate will also receive extra attention at the Pre-SSOP. **See attachment Periodic maintenance in and Pre Ssop DMM.**	We were not aware that this plate could be damaged. At the Pre- Ssop this had not yet been noticed	*2025-09-12*	
4.7.3	Temporary fixes were seen at the lines on the position of the spinal saw in the	We will continue to	The settings in have been adjusted so	When we started using different saws, we	*2025-09-12*	

Minor						
	middle (deboning) uitbeenhal. To prevent contamination of the environment with saw spatters, empty meat crates, blue plastic foil and stickers were used.	use these temporary fixes until a technical adjustment has been made. This modification request has been further processed, in . At the end of September the ordered shielding panels will be ready and installed ***Closed to be verified on site***	that the modification request remains visible after an inquiry has been made. **See attachment Shielding**	immediately noticed that they spread more sawdust. A modification request was submitted for this in . However, when we inquired about this change, it was no longer visible in .		
4.9.2.1	The procedure on managing lost knives was not fully clear implemented: e.g. the	We have further	The grinders have been re-instructed using the	The employee in question indicated that there wasn't	*2025-09-12*	

Minor						
	rack number of lost knifes was not always recorded, and not fully clear recorded was which corrective actions have been taken.	clarified the procedure and the form and created more space so that grinders know better how to register and report this. As indicated in the procedure and on the form, a correct report must be made by the grinders to the relevant department management, who will then take further action and record it in the SSOP	updated procedure and form. This ensures that registration and reporting are processed correctly. **See attachment Messenregieme and Controle messen en handschoen**	enough space to record all the rack numbers, so he hadn't recorded them all. But he directly alerted department management to the missing knives.		

Minor						
		Closed to be verified on site				
4.11.3	Cleaning performance of a crochet cart near the cutting table on the cutting department was not well: Old blood rests and other dirt was seen. (no direct food contact).	The cart has not been used and has been returned to Internal Logistics for cleaning. ***Fully closed***	The corvees have been instructed again that only clean carts may be taken. **See attachment Carts**	It appears one of the corvée workers took the cart from storage before it was cleaned. Perhaps because there wasn't a clean one available.	*2025-09-12*	
6.1.3	Temperature of the livers is manual monitored every hour (Product temperature is defined as a CP) before packing to assure the temperature T<=3°C. However during the onsite audit was seen that this was not fully controlled: the employee was not fully aware of the procedure to follow (as well for the way of temp measurement as the actions to be taken in case the temperature was not within limits. Detail: before dispatch the temperature is again measured at the expedition department as Temperature of the	The procedure and form have been re-distributed to the department so that they can re-instruct the relevant employees and foreman. ***Closed to be verified on site***	The employees and foremen concerned have been re-instructed.	As indicated in the comment, the employee in question was not fully aware of the measurement methods and the measures to be taken.	*2025-09-12*	

Minor						
	product before dispatch (loading) is defined as a CCP.					
6.3.3	The procedure on testing the online checkweigher of the spare rib line was not fully clear. The test results were recorded, but not clear was which deviation of the test weight of 20 kgs. would be acceptable. No clear corrective actions were defined in case deviations were seen during these daily tests. Beside this daily test by the company, the scales are calibrated by a specialized company on yearly basis.	The 20kg test weight has been replaced with a 10kg test weight. ***Fully closed.***	Department management checks daily whether the weighing test has been performed and whether there are any deviations. The procedure has been shared with the responsible person, and everyone is aware of the acceptable deviation. **See attachment training Weegschaal**	Because a 10kg weight was missing, the department thought a 20kg weight would be sufficient. If there was a significant deviation, the scale was blocked and ICT was contacted. Unfortunately, not everyone was aware of the permitted deviation.	*2025-09-12*	

Comments on non-conformities
Click or tap here to enter text.

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

Major						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Audit team

Lead auditor		
Auditor number	**First name**	**Second name**
20287	Martine	Loeters

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
			Lead Auditor	2025-08-12	07.30	16.30	physical	
			Lead Auditor	2025-08-13	08.30	17.00	physical	
			Lead Auditor	2025-08-14	08.30	17.00	physical	
			Lead Auditor	2025-08-15	08.30	15.30	physical	

1. Senior management commitment

Policy
The site policy is documented in: **P-BXT-NL-10126 date 2025-01-10 signed by MT**
It is signed by the person with overall responsibility for the site.
Commitment to continuously improve the site's food safety and quality culture is included.
Communication to staff: Displayed in key areas on notice boards and part of induction program new employees.

Product safety and quality culture plan
The level of culture at the site is identified by: introducing and implementing a plan for the development and continuing improvement of a food safety & quality culture. Culture aspects are clearly communicated through various channels (policy, induction program, annual newsletter).
The culture improvement plan is documented by HQ of Vion in: P -Food-NL-10017, seen updated plan with steps/goals to achieve in F-NL-Food 10085 V2 2024-10-07.

The procedure includes an action plan for the site, indicating and measuring how and which activities will be undertaken within a defined timeframe (SMART).

During the audit the implementation of this plan was also verified on the factory floor and all other departments that were audited. Seen was, that employees are stimulated in their behaviour by team leaders and buddies. Clear individual and group values, attitudes competencies and patterns of behaviour were visible also during the Huddle meeting on the floor (several times per shift) and Tier 1 meeting (daily with all team leaders, managers e.g., implemented whistle blowing system, training, implementation of 5S system, production start-up meetings like VOS and Tier) which are included in the quarterly reviews.

Last review of the plan was performed by a VOS Audit as input for the MR: scores per elements were included in the MR over FY 2024-2025 (July 2024-June2025). These elements are 1. Food safety, 2. Integrity, food fraud and food defence, 3. Animal welfare, 4.Work attitude, feedback employees, 5. Communication / meeting structure and KPI monitoring, 6.standard workflows and methods, 7. Training employees.

Date of last review of plan: **13/08/2025**
Frequency of reviews: quarterly
Senior management were able to discuss the plan during this audit (spoken to Operational Manager).

Food safety and legality objectives
Notable food safety and quality objectives include:

- Product quality (like cutting/ performance mass balance etc.)
- Results of audits (internal audits, external audits, NVWA inspections
- Complaints specified (FS <0,02 per 1000 kg finished product, Integrity <0.02 per 1000 kg) and specific complaints on e.g. FB control
- Food safety culture objects (see above, monitoring of the 7 elements)

Objectives are monitored 4 x by MT

Beside the quarterly review, the goals (KPI's) are also part of the Tier meetings, so actually they are monitored on daily basis.
Key results or significant trends: the site is meeting established objectives / effectively progressing through its objectives.

Management review
Frequency of management review meetings: 4x. All required items are discussed min 4 x year (quarter review).
Who typically attends the meeting: Present during the management review meeting are two site managers, production manager, maintenance manager, QA manager, planning department, finance manager, HR manager
Date of last management review meeting: **13/08/2025**
How minutes and actions are communicated to staff and recorded:
The company is working with the VOS (VION Operating System/Lean management) systematic of communication, measuring results and management of improvement. VOS (Vion Operating System) is based at the lean management principles.

Regular meetings
The communication levels are described in P-BXT-10028 and is based at a cascading model, based at 2-4/day team huddles, daily tier 1 meeting and weekly tier 2 meetings. Objectives are documented in the X-matrix and are demonstrably linked to the vision and mission of the Vion group. There are non-negotiable objectives set for 2025: e.g., training (improve intake, yearly refresh training, HACCP training for leaders and managers, digital SSOP and PRE-SSOP, data integrity. Other objectives are related to the food safety culture (training) and product flow management at shop floor / Digital checklists. Also training goals were set on training executives (management on the floor) on Integrity, FS culture, IFS PIA and how to involve employees in this. Progress of the objectives is reported at a 4-weekly base during the tier 2 meeting.
Minute meetings reviewed: **13/08/2025**,
Huddles on the floor reviewed, communication seen on daily basis documented on the publication board on every department and in the Tier meeting room.

Previous nonconformities
All non-conformities have been closed out suitably (also of last audit), root causes for previous non-conformities were identified and preventive actions were implemented. RCA based on discussions within the QA team incl. involved employees/ management but depending on the risk and impact of a deviation/non-conformance. Where necessary an improvement plan was be written. Seen overall action plan (Excel) which is updated after every meeting.

Organisational structure, responsibilities, and management authority
The site organization structure is documented in: P-BXT-NL-10028 date 2025-04-01 incl. meeting structure.
Management structure:
The senior management has appointed qualified employees for key functions. Responsibilities and competences are laid down in job descriptions. Employees in key functions and the members of the Incident Management Team are announced in the production site. Also, Members of the Food Safety Team are announced. The organizational structure (P-BXT-NL-10028 is up to date) reflects the current structure and reporting is up to date. The responsibilities for the management of activities are defined which ensure food safety, integrity, legality and quality and are clearly allocated and understood by the managers responsible, which was verified during the audit. Clearly documented were who deputies in the absence of the responsible persons. Job descriptions are reviewed, which were in line with the responsibilities. Performance is reviewed by day-to-day management and yearly during the planned reviews.

Relevant documents of QMS are available via the network within the organization and embedded in the quality and food safety objectives. Site managers and QA managers are highly involved driving food safety and quality culture improvement based on VOS system. Performance management (white boards / TVs and daily performance meetings are implemented (Tier meetings)). In the chart all levels are defined for the departments. Site management team includes Food Safety Manager. The QA department responsible for food safety, legality and quality items is reporting within the management team meetings. Clear responsibilities/competences have been documented in QMS including arrangements in case of absence

of the responsible staff. All staff are aware of their responsibilities and have access to relevant procedures. The site uses the knowledge and expertise of the Head Quarter VION Quality department with specialist supporting them. Internal audits are performed by QA key employees from other Vion sites (intercompany).
Overall responsibility for the day-to-day management of the food safety system is with the two Operations Managers

Clear Food safety and legality objectives are set for production in through optimizing of the organization concerning food safety and growth. These are discussed in the management review and are applicable for the coming year. Reviewed aspects in the Q-report are animal welfare, complaints, food safety, suppliers, training and food safety culture. The progress of realization of objectives is monitored via the Management Review called Q-report. Yearly management review process covering the period July – Aug. Results or significant trends that confirm how well the company was doing against the targets of last year are outlined in the MR (verified last MR 2024-July 2025). This management review report is seen which was confirmed and signed by the site manager and quality manager. Corrective actions are defined and added to Q report for coming months. Present during the management review meeting are two site managers, production manager, maintenance manager, QA manager, planning department, finance manager, HR manager

Several routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. Verified last HACCP/Food Safety (4 times per year) meeting date: 2025-08-13. Last senior leadership management (TIER 2, 1 x week every Tuesday).

Reporting food safety issues
How food safety risks, concerns or non-conforming issues are reported by staff and resolved:
Feedback from personnel on factory floor demonstrates that staff is aware when, how, and to who report food safety issues to. The company keeps up to date with emerging issues, legislation, and good practice through branch organization and consultant.

A whistle blowing system is in place, where a box is placed within the rest room and employees are free to leave anonymous concerns. The Operations Manager is responsible for monitoring and cascading this to the relevant stakeholders across the site.

The following supporting evidence was reviewed:

- See also above.
- Tier boards with up to date minutes/actions defined
- MR 2024-2025
- Last HACCP and MT meeting 2025-08-13
- P-BXT-10028
- F-NL-Food 10085
- P-NL-Food 10126
- Local site plan P Food 10059

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

2. The Food Safety Plan – HACCP

There is one HACCP manual described as the: **P-VION-10000 v19 2025-01-09**

Additional assessments are performed for food defence (**P-FOOD-10051 2023-11-22**) and food fraud (product and process integrity control plan **P-NL-FOOD-10049 2024-11-21**).
The local process control plan is documented as P-BXT-NL-100116. The site has 8 CCP's and 40 control points (CP's).

The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical (including radiological risks, allergens) and physical risks for all steps in the production process, packaging material and general elements.
The generic HACCP analyses of Vion are documented as P-FOOD-10000. The HACCP analysis is carried out by the group QA department of the Vion Group and the results are locally translated to the process control plan for the plant Vion Boxtel BV. In this way the site is informed and updated with legal, product & technology information

HACCP Team
The food safety team (local team) is detailed in: P-BXT-NL-10183 2022-06-23
The team leader is well qualified and experienced. The team is multidisciplinary, experienced, and knowledgeable in their fields with required level of food safety training. The HACCP Team is led by the 'Chair' Technical Manager who has more than 20 years' experience in the food industry and trained in Level 3 HACCP. The other members all had appropriate training and experience. Training records were sampled.
HACCP team members are demonstrably trained and have good knowledge (>10 years in the food industry.) of the QMS. Team leader is Q Manager. The company has introduced a special HACCP training (also because of FS Culture improvements) for shift leaders/manager of shifts and departments. These were followed in 2023 and 2024.

2025-07-29 HACCP meeting (tier 2) 2-25-08-12 (min. 4 x year, 4 meetings have taken place in 2025 already, but next meeting planned for Q4 2025, actions defined in Q review document.

Scope of HACCP
The HACCP system scope is documented in: **P-VION-10000 2025-01-09)**. It covers relevant processes and all products on site.
Scope also defined in Export canalisation procedure EKS P BXT-NL-20217 2025-07-29.
Vulnerable groups have been identified. Product is suitable for regular consumer groups.
Product descriptions are detailed in: P-PBX-NL-101702025-04-29. Relevant information is described and information on food safety is included.
The scope accurately reflects all products on site.

Product is suitable for regular consumer groups. Different product groups are applicable (also in P-BXT-NL-10170) and relevant information is described (product description/range, general food safety risks, packaging types, composition, ingredient groups, microbiological, chemical, radiological and physical properties that impact food safety, maximum safe shelf life under prescribed storage and usage conditions

and also information on Food safety is included: the product groups: Food / Fresh pork meat (Dutch origin).
The intended use of the product by the customer has been clearly defined. The intended use does not exclude any consumers, further preservative treatment before it is fit for human consumption.

Process flow diagram
Record key process steps/operations to manufacture products within the scope of certification:
Stroo schema's P-BXT-NL-10026 2025-04-29.

Record date and reason of last verification: **29/04/2025**
Flow-diagrams are maintained and signed as verified by members of the HACCP team; all were reviewed during the HACCP review.

Key process steps / operations to manufacture products within the scope of certification were verified for all processes during the audit and steps were shown. The several stages can be recognised: e.g. purchase/ receipt of pigs, control /check at the stable, slaughtering, chilling, deboning, positioning, packing, processing and storage and dispatch.

Hazard analysis

The HQ Vion organisation has made a general HACCP assessment, for raw material and all process steps and has identified all PRP's, CP's and possible CCP's. In the local HACCP assessment, this is in P-BXT-NL-100116. The hazards and associated risks against the steps and raw materials including packing materials. In the system of risk assessment, a decision tree is taken in the document incl. method of risk analyses and list of literature (included in the general assessment P-FOOD-10000). It is clearly described how to choose to come to PRP, CP or CCP.

Clear instructions on control procedures, critical limits and corrective measurements are present. The quarterly HACCP review by the HACCP team is spoken with all managers and team leaders, in general good control was seen.
Changes in HACCP plans are also a point of attention when including new machinery.
The prerequisite programme is part of the QMS system and is based at EG 853 and EG 854 requirements. Verification by the daily pre-SSOP and SSOP checks, corrective actions are addressed directly, and corrections are demonstrably recorded and verified (all documented in a digital system). CCP records are verified as part of the vertical traceability test, and during the audit on site, no deviations found.

HARA is based on comprehensive information sources**.**
P-BXT_NL-10116 R 38 2024-012-02 HACCP plan site Boxtel.
Severity vs likelihood is considered.
Outline hazards considered specific to each process step:

- foreign bodies, pesticides, chemical risks (including lubricants, cleaning and disinfectants and bacteriological risks, radiological,amongs others.

CCPs, limits and controls
Provide CCPs / PRPs details:

CCP number	CCP	Control measure	Critical limit	Monitoring frequency
1	Faecal contamination of carcasses	Visible detection faecal contamination	zero tolerance for visible faecal contamination just before the carcass cooling step	25 carcasses at least 4 times per day.

2	product temperatures at dispatch for organs	Thermometer	<=3°C, vacuum <=2°C	Every load of 5 measurements
3	product temperatures at dispatch for fresh meat	Thermometer	<= 7ºC vacuum <=6 ºC Separator meat <= 2°C Client specific temperatures of fresh meat , 7°C.	Every load of 5 measurements
4 and 5	product temperatures at dispatch for fresh meat, partly chilled (6 and 30 hours)	Thermometer	<= 7ºC surface temperature and I case of 30h also core temperature max. 15°C	Every load of 5 measurements
6	Incoming meat delivered by external companies	Thermometer	<=7°C	Every load of 5 measurements
7	Incoming/returned organs	Thermometer	<=3°C	Every load of 5 measurements
8	Incoming/returned meat	Thermometer	<=7°C	Every load of 5 measurements

Central a PRP document /plan has been defined **P-FOOD-10000 v19 2025-01-09 CCP/OPRP** plan central.

PRPs have been identified in: **41 in total**. Control measures have been defined. This includes e.g.:
Cleaning and disinfection
- Pest management
- Maintenance and equipment
- Personnel and hygiene
- Training
- Supplier approval and purchasing (customer requirements)
- Transportation
- Cross-contamination as defilement of meat (including manure contamination risks) / fallen meat
- Water and air
- Cold chain
- Waste
- Traceability
- Integrity
- Product information

Examples of corrective actions:
Actions when monitoring levels exceed acceptable limits are documented within the HACCP plan, recorded and investigated. Based on live demonstrations and records checked during this audit, all CCPs are in control conform the work instructions.

Validation, verification and review:
The company has effectively validated and verified the HACCP/Food Safety Plan, including the critical limits, control measures and PRPs specific for controlling food safety hazards. Procedures for verification have been established.

Procedures include performing internal audits, review of records where acceptable limits have been exceeded, review of complaints (by enforcement authorities or customers), review of incidents (of product withdrawal or recall). Validation of the new stunning equipment CO2 is the last validation observed. Documentation and record keeping is verified.

Results of verification/validation are recorded and communicated to the HACCP food safety team.
Validation was sampled for the CCPs.

The following supporting evidence was reviewed:
P-BXT-NL-10028 date 2025-04-01 HACCP team incl. meeting structure. Tier 1 5x wk., Tier 2 1 x wk.
Frequency of planned HACCP system review (at least annually): annually
Date of last review: 13/08/2025
Completed by: QA manager and plant manager
Daily verification on CCP's is valid incl. documental control checks examples seen:
P BXT NL 100258 29-04-20254 partly chilled surface temp <= 7 C and core <= 15 C safe results of 12-08-2025: route therm. 116 and 118 (client #), verification with 113 and 112 thermometers (max. difference = 0,4 C, all ok MS performed the verifications (qualified|).
DMM thermometer 130 rit Den Bosch Coldstore: <2C
Seen of CCP 2&3 P BXT NL 100258 29-04-2025 / (3c is DMM) Fresh meat and organs.

Proces beheersplan P-BXT-NL 1-0116 2024-12-02
Process flow diagrams P-BXT-NL-10026 2025-04-29.
HACCP Verification over FY 2024/2024 process Boxtel 2025-08-13
MT/ Hccp meeting minutes 2025-08-13

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual, 3.2 Document control, 3.3 Record completion and maintenance

Food safety and quality manual
The Food Safety & Quality Manual) **P-NL-Food- 10028 2024-10-18** with department specific work instructions are available on the network ( ) and at point of use as demonstrated throughout the audit. All procedures and work instructions are in Dutch, German and English; all staff are expected to have appropriate levels of one of these Language skills. Documentation seen is up to date. Only QA can make the changes into the system. Changes are indicated in the procedures in a yellow color.

All documents seen during the audit were complying.

Record completion and maintenance.
Records are in good condition and retrievable electronically or on site. Records retained based on best before date plus 1 years as a minimum as common in the food industry (details in procedure ver. **P-NL-Food- 10028 2024-10-18**).

The following evidence was reviewed:
- QAOnline
- Didtal and records on paper

3.4 Internal audits

The following document(s) define the process: **P-VION-10011 2024-11-19**
The audits generally follow ISO9001 and BRCGS guidelines and clause structures.

Internal audits are conducted: quarterly. The program includes at least four different audit dates spread throughout the year and is risk-based, considering any previous audit findings.

Internal audits are performed by the QA managers of affiliating sites and group QA managers to maintain independency.

Auditor competency has been demonstrated through training records, sufficient knowledge of the products and processes and experience.

Internal audits are reported in fixed formats with annexes per scheme. BRC is annex 3 to the audit report. Objective evidence of compliance and non-compliance are reported. The audit criteria are clearly referenced. Findings are included in a central log, monitored for follow-up, and evaluated in management meetings. Follow-up actions include immediate correction, root cause analyses and corrective action. Responsibilities and timescales for verification/closure of findings have been defined.

The reports reviewed detailed conformity as well as non-conformity. A few minor nonconformities have been raised with no trends identified. Root cause is performed (results of discussions). All actions were closed within the due date. Audits contained a good amount of detail.

A separate program of internal inspections of the factory environment and processing equipment is undertaken daily by pre-SSOP and SSOP control and also factory environment and processing equipment inspections are included in the quarterly glass inspections.

Inspections are performed by using a digital checklist which includes a clear action list. Performance is measured based on a scoring system and link to a KPI. Actions in response to deviations are recorded, cascaded to team leaders for follow-up, and discussed in HACCP meetings. Completion of actions is

verified upon the next inspection by responsible person. The effectiveness of the system is discussed in the Management Review.

Inspection report reviewed during this audit: **2025-08-2025**. Besides this report, more reports assessed (see below) A few minor issues had been observed. Follow-up of actions is demonstrable with records.

The following evidence was reviewed:

- Procedure P-VION-10011 Internal audits including the planning
- Results of internal audits and inspections in the management review
- Internal audits are reported in: . P-VION-10011 2024-11-19. RCA only for major NC;s
  Internal audit reports following planning Plan mail 2025-01-5:
  6 Internal audits in total of past 12 months (2 Hygiene/ system audits, 2 x 3rd countries/ client specific items and 2 annimal welfair including also hygiene aspects and behaviour.
- 0802924 announced 9 minors: BY (14 jun 2023) 8 05-2025 refreshed IA training
- Pre SSOP and SSOP's of 28-30 May 2025 (tracetest) and during the on site audit days
- Verification list of all PRE-SSOP and SSOP inspections 1x month.
- Action list of findings in all audit reports and included in Q report / MR
- 26/27 August 2024 9 minors, (IA) all closed
- 2024-09-11 (IA , Internal auditor trainig 2025-05-08 (refresh training) 3 minors all closed
- 2024-10-08 (IA) 3rd countries audit 8 minors, also included in scope integrity/ HACCP/ PRP/ ISo9001 and 3rd countries alpplication requirements
- 2025-01-20 Animal welfare /hygiene and behaviour (IA by) all ok
- 27-2-2025 unannounced internal audit, 8 minors, 2 slill open but not overdue
- Beside these internal audits > 10 client audits take place per year (most of them including trace test/mass & balance).

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The company's raw material risk assessment, including primary packaging, is documented in: **P-NLFOOD-10055 Management of suppliers of raw material, services and packaging.**
All potential risks have been appropriately considered.
Significant risks include: **status of the pigs on diseases or physical wellbeing.**

The risk assessment forms the basis for the raw materials acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.

The supplier approval procedure is documented in: **P-NLFOOD-10055** and responsibility and initiation are with HQ.
Procedure is found to be suitable and effective.
List examples of suppliers reviewed during this audit:

Name/Initials supplier	Supplier of:	Method of assessment	Evidence seen
VIO Farming	Pigs and sows	VKI status of farms	VKI's
	Foil	GFSI certificate	BRC packing
	Foil	GFSI cert/ BRC iop	FSSC packing
	Carton	FSC	FSC cert

All suppliers are evaluated: annual.
Suppliers are rated on quality, service, delivery, and complaints. All suppliers graded satisfactory in the past year.

Suppliers, that are not audited or certificated, have been traceability tested on first approval and then at least every three years: **Yes**

For raw materials purchased from an agent, broker or wholesaler, is the identity of the last manufacturer, packer or consolidator of the material known:

Traceability system is verified through: GFSI certification of the manufacturer.

Handling exceptions and absence of information is considered in the supplier approval procedure. Exceptions can be made on supplier status and when information is not available straight away. But this should be fixed within 3 days otherwise the supplier is taken off the approved supplier list and blacklist.

The following supporting evidence was reviewed:
- Supplier evaluation Form latest update dd 2025-03-27 F-Food-10000 on template EN-01-2023.
- Overview review F-Food-10032 2024-12-19 nonnon-food and sevices

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Procedures for the acceptance of raw materials and primary packaging on receipt are in place and based on risk assessment (see 3.5.1).

Deliveries are visually checked for product integrity, labelling and cleanliness. Based on risk assessment, food safety hazards are controlled through COAs, internal analysis etc. Samples have been taken (see below).

The requirements to be met for acceptance is identified for all raw materials (including primary packaging). Parameters for acceptance and frequency of testing have been clearly defined, implemented, and reviewed.

The following evidence was reviewed:
- Livestock delivery procedure P- BXT-NL-10022VKI's of several farmers/UBN's (see also traceability)
- Overview review F-Food-10032 2024-12-19 non food and sevices
- Vion Boxtel BV is also processing pork middles, delivered by other Vion plants intercompany. The temperature of incoming meat is controlled as CCP6.
- On location Boxtel, there is an internal warehouse managing the packing materials on site. The departments order on their turn packing material at this internal warehouse. Good control was seen also during the vertical trace test.

3.5.3 Management of suppliers of services

The following services are used:
- Pest control
- Maintenance
- Laundry services
- Contracted cleaning
- Transport
- Off-site storage
- Temporary employees

Approval and monitoring for ongoing performance are described in the company's supplier approval procedure (referenced under 3.5.1). Service suppliers (based on risk assessment) are evaluated annually.

Contracts are in place that clearly defines service expectations. Food safety aspects are appropriately addressed.

Company	Service
	Clothing
	Cleaning
	Pest management

Many suppliers of services are long standing with a good history of supply and contained on the approved supplier list from initial approvals.

Management reviews include performance of suppliers of services.

The following evidence was reviewed:

- P-FOOD-10026 2023-11-29 on Product and service requirements Management of suppliers of services
- Overview review F-Food-10032 2024-12-19 non food and sevices

3.5.4 Management of Outsourced processing

Not applicable – no outsourced processing in place.

3.6 Specifications

Specifications include limits for relevant attributes (relevant chemical, microbiological, physical and allergens). Key data is included to meet customer and legal requirements and to assist the user in the safe usage of the product.

During the audit, several specifications were reviewed:

- Finished product: art Trimmings 95/5 dd 2022-10-10
- Packaging: produced by BV 2024-05-17
- Packaging: produced by folia 2024-05-17
- Cleaning agent: Kenosan Lactic cleaning detergent by , SDS and TDS online available
- Lubricant: greases by , SDS and TDS online available

All were seen to be clear and accurate.

Formal agreement of customer branded products is verified through the system of the retailers (for instance SIM, Trace one, or GS1). Verified customer approval during the vertical traceability exercise.

Frequency of review of specifications: at least every 3 years or if changes occur.

The following evidence was reviewed:

- Application MDM with all finished product specifications
- List of all chemicals onsite: seen specifications
- wash 2019-06-19, DM foam 2016-03-17, Profile spec 2019-06-19, wash 2019-06-19

3.7 Corrective and preventive actions

Procedures are in place for handling and correcting issues identified in the food safety and quality management system. This is documented in: P-Food-10171 2008-06-30 and the VOS system.

Several systems on correction and preventive actions in place. For operations the process of corrective and preventive actions is related to VOS for the operational processes.

Corrective actions related to complaints are communicated via the tier 1 structure.

Corrective actions related to pest control, pre SSOP, SSOP are recorded and demonstrable. In case of unfavourable trends an A3 improvement process is starting to investigate the root cause and identify measurements to improve. Used methods for improvement is based at go-look-see approach.

Corrective actions on sampled Internal audits were also checked for, good follow up and corrective /preventive actions were demonstrably taken. Some open actions were seen, but no overdue deadlines.

Managing corrective actions, defining root cause and actions for follow up and effectivity check is described /managed by several procedures and methods of follow up.

The following evidence was reviewed:

-
- VOS system (results of Tier overviews)
- Internal audits corrective action overviews
- Excel overview complaint handling

3.8 Control of non-conforming product

Control of non-conforming product is detailed in: **P BXT ML 10031 2015-11-23**

There are categories for customer complaints, internal NCs and incidents, non-conforming materials and suppliers used.
Most internal non-conforming products are caused by temperature issues: Form F BXT 10064 2022-09-02

Semi) finished products are checked regularly during the process stages. (the pigs (raw materials) are checked during regular processes.

Clear procedures for control of non-conforming products (e.g. fallen meat, blockades) are in place: Products on hold are physically identified as such (red label/tape). Process is seen in practise during the site audit for fallen meat in the middle cutting area; no deviations seen. The procedure for non-conforming product defines how non-conforming product is identified, quarantined and disposed of.
Non-conforming products are physically labelled with a red form.

Returned goods are managed by P-Food-100181. Only authorised personnel (QA officers or department manager) are allowed to release products.
Raw materials and (semi) finished products are checked on a regular base during the process stages. Products are released by production team leaders. Corrective and preventive actions are described in several work instructions. Clear process well understood by staff that was interviewed during the audit.
Manual hold by labelling pallets of recipients with label covering the required information. Release of products on hold by production manager or QA-staff. Segregated sections in the final product warehouses for non-conforming products, returned goods (none seen during the audit). Corrective and preventive actions system is up to date. The handling of non-conforming products is according to requirements. No blocked products seen during audit round.

Corrective and preventive actions are described in several work instructions (see previous section). Clear process which is well understood by staff that was interviewed during the audit.

Responsibilities regarding release of products on hold lies with department responsible.

Records are kept of decisions made and where product is destroyed for food safety reasons.
These are recorded and kept by each department.

Example seen of non-conforming product incident: livers too warm on 2025-08-14: collected in crates to be chilled to T<3°C before bulk packing, clearly marked.

The following evidence was reviewed:
See above

3.9 Traceability

The traceability process is documented in: **P-BXT-NL-10120 2023-01-06, packing P-BXT-NL-100125 2026-07-19**

Traceability through the process:
Traceability system operates through computer system and paperwork enables trace of raw materials and packaging from supplier through processes to packing and dispatch. Incoming pigs are entered into the ERP system and classified. After cutting carcasses is transported from the warehouses to the production facilities and further on. Recording batch information packaging materials, rework batches or pallets to be re-used on the production record sheets (as reviewed for vertical audit).

Traceability marking on products:
Traceability system is well developed and mass balance also induced by the IFS PIA requirements on food fraud. It covers raw materials through work in progress to finished product including packaging materials and distribution according to (P-Food-10015 2022-02-23). Procedure includes the required documents to complete the traceability and the mass balance. The traceability is according to requirements country of sales e.g. China, USA, tested during the specific annual China/ USA audits. This system is fully based on digital applications as SIS (Stable Information System), and other applications written documents, batch codes and bar codes. System continuously in development.

- Porks bear an earmark (+ accompanied by track record and VKI)
- Information earmark is linked to the chip in the slaughter hook and recorded in .
- Half carcasses get an EG-mark + serial number (together with date of slaughter + slaughter line number + origin)
- Technical parts (own production + additional purchase) get a batch code (EG-mark + date of production + origin)
- By-products get a batch code (date of slaughter / production)
- Finished product is traced depending on the date of production + calculation number (weighing label is scanned at dispatch)
- Primary packaging materials and dry ice are traced on the date of receipt / breaking into new batches
- Returned product + NAR (destination form), Reworked product.
- Crates in the Cutting departments and in the new section Middles have chips and are given info per line. Readers on several places.

Traceability test details company:
Frequency: min. 1 up and 1x downstream per year, however, during most client audits, also a trace tests must be performed, so real frequency is > 10 trace tests per year.
Last test conducted: **18/03/2025**
Product **Back 170-190 t.b.v. and towards UBN's**
Lot code: **slaughter date 2025-02-25**
Results are retained as documented information and reports include all relevant information and data (including mass balance information). Traceability is achieved within 2h and 40 minutes.

Vertical audit details:
Finished product: **GF Belly sheet restless to be frozen in boxes for export (Japan).**
Raw materials: **slaughter date 2025-05-27 (checked for UBN's)**
Printed packaging and labels: **order number , rit number**
Production/packing date: **30/05/2025**
Quantities reconciled: **kg**

Key documentation reviewed including process control and quality control documentation:
Of slaughtering date and production date all Pre-SSOP's and SSOP, VKI's of 3 out of all deliveries of that day were checked, quantity records checked, the mass balance of the slaughter day was checked and also of deboning and cutting/portioning steps in digital applications. This, as well as tracing of the (primary) packing material (plastic film) and carton boxes as the products are wrapped in film before packing in carton boxes. Al was traceable.

Summary traceability and vertical audit:
Fast tracing (forwards/backwards) including packaging was possible in the records/system. Rework is not used. No product in stock, all sold. Seen product specifications of all raw materials and finished product, receipt records, food compliance certificate is verified. Fully traceable one-step-up and one-step-down the system, including packaging. Verified records of CCPs and PRP's, delivery control checks, production checks, calibration and analyses were verified too. Time to perform the test was respected (<3h). There were no issues found during the product traceability and all documents showed control over the system for

food safety by the organisation. Food contact materials legalization is fully implemented. The company's traceability system is found to be effective.

3.10 Complaint-handling

Complaint-handling is documented in: **Procedure P NLFOOD 100054 2024-10-31, Form F-NLFood-10007 2025-02-19, P-BXT-NL-10096 2021-12-27.**

Follow-up of complaints is managed through usage of the standard form to be filled out by QA and sent back asap to the head office where the complaints are received and from where (customer) communication takes place.

Complaints are received by the sales organisation and send to the complaint inbox email address of Vion Boxtel. Complaint handling is performed at a daily base within the prescribed timelines. Process is verified for some examples; the complaint handling is demonstrable organised. Organised process with in-depth analyses for food safety complaints and link to the VOS system. There's a weekly complaint analysis report, which is discussed in the tier 1 meetings. No serious quality / Food safety complaints were recorded.

QA also keeps an excel file to keep an overview. Complaints are handled centrally using the forms and investigations are completed by the site QA and returned to the central function for responses. Corrective actions are carried out promptly and effectively.

Product complaints:
Q3 2023-Q2 2024 : complaints
Q3 2024-Q2 2025 2023 YTD : complaints
Far most of the complaints are about claims on prod. quality like cutting size etc.
Example wk. 31: complaints on FS related issues and complaints mentioned as claims.

Top 3 of complaints (claims):
1. Too light
2. Too heavy
3. Broken bones

Top 3 of complaints (FS related):
1. Product too old
2. Product was fallen on the floor (of the trailer during transport)
3. Orther

A trend analysis is maintained and documented and discussed in management meetings (including data was discussed during the quarterly management review).

There has been a significant increase in complaints against previous FY (see above).

No recalls/ withdrawals, no serious FS related complaints received.

The following complaint samples were taken:

Complaint No. on freshness of the meat, not fully info received, no RC could be made 17th complaint was received, 19th feedback was given, more info needed. To be continued or when no info is provided, this investigation stops.

Complaint No. 16-06-2025 received on grease on product sent to client # pd 11-12-2024 grease of the trim knife. RC, answer and corrective actions were demonstrably defined.

Complaint No. On cheeks, Listeria was found by the client. Product specification declares no Listeria free product. However, Vion wants to know, so this is investigated incl. RC: samples are checked, other samples all ok, no listeria around that prod. date were found. Feedback was sent to the client.

3.11 Management of incidents, product withdrawal and product recall

The company has procedures in place to report and effectively manage incidents and potential emergency situations that impact food safety, authenticity, legality, or quality.

Contingency plans have been considered, including the need to withdraw or recall products.

There is a documented product withdrawal and product recall procedure incl.how to handle in case of serious other incidents: **P-Vion-10015 2025-05-08**

The recall procedure is tested 1x / year.

There is a Vion overall crisis and recall management procedure managing incidents and potential emergency situations that impact food safety, authenticity, legality or quality issues and is applicable for recalls and withdrawals. Information on informing certification body was included. This procedure covers the process which is applicable in site and is managed by HQ, Vion. 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 local procedure Product recall P-BXT-NL-10024 date 2025-04-04 defines the recall team and complies with these requirements.
LRQA is referenced as contact, indicating that incidents/withdrawal/recalls shall be reported via the website within 3 days of the event.

No withdrawals/recalls occurred since the previous BRCGS audit.

Date of last incident management procedures test: **31/10/2024**
Type of test completed: check phone numbers and availability of recall team members outside normal working hours (at night)

Date of last incident management procedures test: **14/08/2024**
Type of test completed: recall/test was completed as in a previous test (2024-07-29) an action was defined as the general recall procedure of Vion central was not compliant for site Boxtel: so, this new test was done and new procedure was approved.

Mass balance information is included in the report. Traceability is achieved within 3 hours. Successful test conducted. From test of 2025-08-14 as well as the test of 2024-10-31 no improvements have been required as result of the outcome.

The following evidence was seen:
Reports of the performed tests (see dates above)

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.1.5	No purchasing of Agents or Brokers
3.5.4	No Outsourced processing

4. Site standards

4.1 External standards

Plant located in an industrial area in a rural environment.

Site boundaries are clearly identified. Premises is fenced off with security gate access to the facility.

Types of buildings include stables and life animal truck cleaning facilities, production facilities, storage buildings, offices, crate and dolavs cleaning building also used for storage of packing material, and maintenance workshop.

Site security:
Unauthorized access is prevented by use of badges access. Visitors/contractors must register at the security building. Several CCTV cameras are installed.

Supervision by maintenance staff. Truck drivers need to register before they can enter. The company is always guiding the visitors while visiting the production areas.

External tanks are in place and locked when not in use. This was checked during the audit outside tour. Access to these tanks is controlled through the site key plan.

Good condition of construction noted. No risks have been identified related to the external environment. The site area is properly maintained.

The following evidence was reviewed:
- Stables were rebuilt currently, project is almost finished.
- All gates are closed and access only on audthorisation by porter

4.2 Site security and food defence

The individuals or team completing threat assessments and food defence plans have the appropriate knowledge**.** The Team is also the site HACCP team. Awareness training was seen for team members.

There is no legal requirement for specific training.

Food defence risk assessment is documented and based on TACCP: P BXT NL 20272 procedure 2024-11-30-2024 / daily check and included in internal audit scope.

Risk score calculation based on impact and likelihood of occurrence. The threat assessment includes both internal and external threats. The site has established a documented food defence plan covering assess points and controls. Camera's porter 24/7 view and control.

Examples of threats that have been determined **unauthorized visitors.**

Appropriate control measures are developed and implemented: **gate control and visitor registration**

Access is via key coded doors and combination locks. There is an electric gate that can be used outside of normal operating hours. Security training is included for all staff as part of the HACCP introduction to site.

Raw material storage areas are controlled and internal. No external intake points.

The following evidence was reviewed:
2025-06-30 last verification BY QM/ MT SSOP per department.
Procedure P BXT NL 20271 2024-11-26 risk analyses Food defiance Latest review of threat assessment during security assessment 2024-11-26 as input for the MR.

4.3 Layout, product flow and segregation

A lay out map with flow of processes and movement of personnel is present, including zoning. This is documented in **VION Boxtel map last update 2025-01-28.**: risk zones are included and contains the flows in conformity. (Production risk zones (based on BRCGS Annex 2)).

No high risk or high care production assigned on site. In the low-risk areas, effective procedures are in place to minimise the risk of the contamination

Contractors and visitors, including drivers are informed of the requirements for the areas they are visiting through hygiene rules, placed on walls and to be signed in contract or during visit (visitors and contractors).

Premises allows sufficient working space and capacity to work in a proper way. There were are temporary constructions noticed during this audit. ***(see Minor NC).***
Also, there was no modernisation work in progress during this audit. There is a site plan for the plant. The routing for the removal of waste products is also demonstrably stated.

The slaughtering, processing and packaging areas of the production are well designed and maintained to prevent risk of contamination. Premises are suitable for the intended purpose. Process flow is designed to minimise/prevent contamination and agreed with the Food and Consumer Product Safety Authority. Personnel-, material-, air-, water, waste-, services flows are designed, and equipment placed in such a manner as to minimise the risk of product contamination.

The following evidence was reviewed:
Actual site map dated 2025-01-28 is seen
Verification performed during on site audit.

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

Building materials were in good condition. Smooth cement floors, walls, and ceilings from metal cladding.

Condition of building was suitable and satisfactory for the process. The cutting and deboning site is a modern building fabric, well maintained. Good facilities.

No elevated walkways, mezzanine floors that are adjacent or above open product.

Walls, doors, ceilings and floors were suitable in general. Drainage system and ventilation are according to requirements. Well maintained ceilings/constructions with a good access to suspended ceilings, which are full closed. Protected glass, no windows can be opened in the processing areas.

Floors are coated or granite and in good condition. Continuous attention is given to the condition of the floors.

There's a technical area above the production area of the middles and packaging area for technical parts like the ventilation system.

Suitable ventilation and cooling throughout the factory. Daily check of the condition by the SSOP checks and in depth by the quarterly inspection of fabrication and hygiene aspects. Permanent swipers available to remove condensation (risk based) from walls, pipework, ceilings, evaporators, etc.
However, condensation was seen under the ventilation equipment in area where the organs are packed. The ventilation was not fully adequate at that moment of startup, no organs were on the line jet at that moment. ***Minor NC on 4.4.10***

Doors in good condition, external doors are well fitted and kept closed when not in use.

There is a dedicated washing area present. The washing of equipment is done separated from production. Plastic strip curtains present, no deviations seen.

The following evidence was reviewed:
All above was verified during the onsite audit days.

4.5 Utilities – water, ice, air and other gases

Water is used for: **cleaning purposes, in the slaughter process used to rinse meat parts, for scalding and to spray on the carcasses during cooling.**

Source(s) of water supply:
- Municipal/city
- In-house treated (Yes. Descaler system installed to prevent equipment damage)
- Storage in holding tanks

Only potable water is used.

Microbiological or chemical testing is undertaken: **quarterly** (last test results dated 2025-06-03).
Water (incl. Ice) testing is completed to ensure the requirements of ' Drinkwaterbesluit' are met. Analysis reports for chemistry and microbiology are completed checks via an accredited external laboratory.

A water system distribution schematic diagram is available, including soft water and holding tanks for cold water, 60°C and 80°C water. Although building activity not yet new plan available

Sampling points include: ice machine and canteen water

Gas used in packaging: **Yes**
Compressed air used: **No**

Purpose of compressed air use: machine steering
In direct product contact: **No**
Filtered at point of use (when in direct contact): **Na**

Checks are done on filter replacement as part of the preventive maintenance program. But no specific micro filters needed as no food/ packing contact is applicable.

Steam is used in the slaughter department to “clean” parts of the carcasses.

CO2 is used in MAP packing (bulk packing fresh chilled) meat.

The following evidence was reviewed:
- Dry ice is used for cooling purposes (taken up in microbiology testing program), CO2 gas is used for packaging purposes and stunning of pigs, Food grade specifications were seen up to date. ( )

-4x4 samples year risk based (s.a. spray cool tunnel 2025-03-19 and 2025-06-03 Turbidity smell/ taste, E coli, TPC 22, Enterococcus analysed by

- Steam boilers maintained by service supplier. Ventilation system with use of Air socks, managed well. Regular cleaning (changing and washing) of air socks is implemented (report date 2024-04-30).

4.6 Equipment

Key production and product-handling equipment include: **Equipment installed is typical for usage in the meat industry, most made from stainless steel and food contact surfaces are suitable for intended use. Equipment is good to clean, typically on daily basis with usage of water and cleaning chemicals.**

Equipment is suitable and designed for the intended purpose; mostly stainless-steel construction.

Line equipment is sourced through: procurement, specified, tested, and commissioned before use.

Equipment which is in direct contact with food is suitable for food contact and meets legal requirements where applicable.

Purchase specifications are in place to ensure new equipment meet legislative requirements and is suitable for food contact where appropriate.

Equipment is made of: stainless steel. Belts in contact with food are food grade. Hose used for product transfer is registered as FDA compliant for food contact.

There is a procedure for moving static equipment detailing preventing potential risks to food safety and equipment integrity (MOC).

Equipment that is not in use is always taken into the cleaning schedule.

Mobile equipment and battery-charging equipment is in use, potential risk to the product is prevented by means of separate storage and up to date maintenance.

The following evidence was reviewed:
During on site audit this was assessed.

4.7 Maintenance

Preventative maintenance
Maintenance management system: system.
Frequency of main checks: daily (startup), weekly, monthly, all depends on the type of maintenance or inspections required per item in (> 3000 equipment indicated, all spit up again in specific parts of equipment) This managed by engineers on site.
Maintenance people (>40 persons) are trained on hygiene and contamination prevention. Main Maintenance Department is located in a separated building from the production. Per department there are production employees appointed for operator functions and small maintenance and repair activities. Recognisable by black clothes as maintenance employees wear green clothes

Notable equipment include: mobile equipment included in , procedures on cleaning are applicable for re use.

Preventative maintenance covers all plant, processing equipment and mobile equipment.
Contractor services are used for: several companies like managing the cooling installations, Backsaver ( ), .

However: The white protective plate on top of the bone press (DMM processing) was damaged which can cause contamination of the bones by foreign bodies arising from the plastic protective plate.
No demonstrable specific interval was planned for inspection of this protective plate.
Plans are downloaded along with relevant job sheets. Once completed they are put into the system. ***Minor NC on 4.7.2***

Samples seen and completed to schedule:

- Project number 00254 ceiling slaughter department planned from 22-05-2025- Q4 2025.
- 293913 repair near washing location because of pest prevention
- 259436 SF 10-03-2025
- And more

Inspection of equipment condition
Inspections for damage and wear are completed for: daily inspections/ lubrication jobs, seen for slaughter and cutting / packing departments.

Temporary maintenance
Temporary repairs are controlled via: control check via SSOP for each department/ area on daily basis performed.
Temporary fixes were seen at the lines on the position of the spinal saw in the middle deboning area (uitbeenhal). To prevent contamination of the environment with saw spatters, empty meat crates, blue plastic foil and stickers were used. ***Minor NC on 4.7.3***

Handover
Suitable handover processes were in place after maintenance work to eliminate foreign matter risks generated. Maintenance is performed after regular working activities and before cleaning activities (after working hours by (external company). Maintenance engineers are responsible to take care of their own equipment and removing spare parts/ materials/cleaning up. When maintenance activities must be formed in between, in case of corrective maintenance in between, in such cases, always a handover takes place between engineer and production management (documented on SSOP) who is responsible for cleaning activities. The prod. management manage the cleaning: a special dedicated cleaning team, trained to perform cleaning activities (red clothing) will take care of safe and good cleaning.

Lubricants

Range of food grade lubricants used|: All used lubricants are food grade with an FDA H1 status (food grade), verified for lubricant H1 and available to greasers during the weekend; MSDS sheet were seen, and lubricant is food approved free from allergens. Automatic lubricant system in use for the main process like transport chains.

Overall cleanliness engineering workshop
The workshop was well maintained with a swarf mat present on exit of the workshop. The workshop is fully segregated from production areas. Entry of the site by regular hygiene sluice.
There is also a dedicated rest room, changing room and wand wash present.

The following supporting evidence was seen:
system
Planning jobs/ work preparation/ personal planning
Jobs in : dashboard with status of jobs/ open jobs etc.
Process equipment and main process steps are monitored by the maintenance department via a system in combination with camera surveillance at critical technical points of the installation. Systems are generating SMS messages to mechanics in case of failures and deviations.
Communication with : There's a continuous dialog system with the external company about the performance of their (mostly slaughtering) equipment.
Eternal companies enter the site via the porter: sign for hygiene rules etc.
Workshop/ storages

4.8 Staff facilities

Changing facilities
Several designated changing facilities for staff in place that are appropriately sited. Partly sloped lockers observed for storage of outdoor clothing, and a separate area for protective clothing.

Workwear is laundered by external service supplier to a defined process and brought to site in a closed container. Captive site shoes are stored in the work-wear locker when not in use.

Handwashing
Hands-free operable handwash facilities located in several areas at entrance to production, equipped with an adequate supply of water delivered at a suitable temperature, soap and drying facilities. Advisory signs for prompt handwashing are displayed above the sinks. Shoe washing brushes on entrances to cold open product areas.

Toilets
Toilets provided do not open directly into production or packing areas. Adequate hand-washing facilities are provided within toilets conform 4.8.5.

Catering facilities
Several rest room areas for food storage and eating; catering facility in place. There are also vendors for food and drink. Staff storage for food were seen to be clean and maintained.
No working clothes are allowed in the rest room areas, only hairnets are obligated to wear.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

An approved list of chemicals is available and documented in: **(greasing and technical) and cleaning chemicals provided by (list facility service).**

Chemical containers including cleaning chemicals are clearly labelled and separately stored in secured compounds.

Safety Data Sheets / specifications are available, and samples have been taken: online and online for greases.

All chemicals as sampled are suitable for the intended application.

Waste handling and spillage control is effectively managed.

4.9.2 Metal control

The following type of sharp metal equipment is used: blades, saws, knives. No snap-off blades used. A knife handling policy is in place. However, the procedure on managing lost knives was not fully clear implemented: e.g. the rack number of lost knifes was not always recorded, and not fully clear recorded was which corrective actions have been taken. ***Minor NC on 4.9.2.1***

Several examples were seen on the factory inspection and observed to be in a satisfactory condition.

Condition and integrity are monitored: by PRE-SSOP on daily hygiene audits; see section 3.4.4 for details.

Staples, paper clips and drawing pins are not used in open production areas.

Daily review of amount of knifes and technical status, all ok

4.9.3 Glass, brittle plastic, ceramics and similar materials

Monitoring of glass/brittle, plastic and ceramic items is done through: SSOP/PRE-SSOP checks.

Records were seen. A glass / hard plastic register is in place and records the location and condition of glass / hard plastic on **F-BXT-NL-10057 2025-04-11** Glass / hard plastic audits are regularly (4x per year) carried out by QA and daily by production department on Pre-SSOP and SSOP.

Besides daily check, 1x /3 months audits are executed by the verification of the building inspection by the maintenance department, which is documented as a map of the specific department. Verified within the traceability test and seen internal audit reports. Follow up of action points is demonstrable.

No glass incidents to date took place since the last audit. Staff is well trained in process and mock incidents which were part of the training (training is repeated at least once per two years).

Windows are protected against breakage with foil.

The following supporting evidence was seen:
Glass and hard plastic on mobile equipment like forklift trucks are included on the glass and hard plastic register.
4x glass incl. inventory (building) inspection List 100057 2025-04-11
Inspection seen of 2025-05-07

4.9.4 Products packed into glass or other brittle containers

No glass packaging activities in place – not applicable.

4.9.5 Wood

Wood is not allowed (and not present) near open product areas.

4.9.6 Other physical contaminants

Describe any other specific controls on physical contamination such as packaging:
De-boxing and debagging procedures include controls for physical contamination and is executed in separate areas.

Management of portable handheld equipment:
Metal detection is used. Single piece detectable biros are used with no small parts evident.

Special crates are used to store small equipment to be used during deboning.

No specific issues seen – there is a protection of the equipment for packaging falling into the product. Blue metal detectable pens and plasters are used, and paperclips / staples are not allowed (verified during audit on production floor).

Other types of control for contamination not covered in section 4.9 are not required.

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

Detection equipment (metal detection) is installed as result of the risk analysis and is controlled as a CP.

The sensitivity of control measures is appropriate as determined through validation study.

No other types of foreign body contamination removal are used.

Escalation procedure in place in case of breakdown incidents. Detected foreign materials are evaluated and analysed by QA.

No foreign bodies detected recently.

The following evidence was reviewed
The HACCP study determined the metal detection steps as a CP. Only BtoB products, the sensitivity of the control measures is appropriate, the sensitivity of the metal detections is listed for all metal detectors on site.
This includes the combination with used test rods size, type of FP to test, volume size of boxes and type of product to detect (density).
Annual verification performance checks are implemented ( ) of all metal detectors (f.e.) (incl. justification of locations and sensitivity).

Good attention was seen on usage of (blue) plastic used as covers or packing material, inner liners to avoid contamination as plastic is listed in the top 3 of complaints.

4.10.2 Filters and sieves

No filters or sieves used.

4.10.3 Metal detectors and X-ray equipment
Metal detection equipment installed as result of the risk analysis and are controlled as a CP. Monitoring frequency: depends on type and location of the metal detector, described on the list used for documentation of the checks. All checked at start/end of the day, check in between. After breaks depends on type of product/ line. Metal detector. Metal detection verification is performed through test sticks. The testing procedure is found to be suitable. No history of failed (metal) tests. Metal detection; test bar with bullets: Flex fresh: Fe 5.0 mm - non-Fe 6.0 mm - SS 7.0 mm Bacon / shoulders: Fe 4.0 mm - non-Fe 5.0 mm - SS 8.0 mm Vacuum: Fe 3.5 mm – non-Fe 4.0 mm - SS 6.0 mm Tongue: Fe 2,0 mm – non-Fe 2.5 mm - SS 4.0 mm Corrective actions are clearly defined in the CP control plan. Data of the metal detectors is available in the documentation. E.g. the sensibility of most of the detectors is clear. An automatic rejecting and/ or belt stop and or alarming system is in place. Metal detection CP was tested during this audit. Correct operation was observed in line with the work instruction. During vertical test metal detection was checked including check on maintenance and calibration, ok In case of detection of foreign body contamination, the material is analysed by QA/QC, al listed per location/ metal detection. Very less findings of FB metal by metal detection. **The following evidence was reviewed** Metal detection on technical meat parts (B to B products) is more often performed to protect equipment. Checks are performed every one or two hours. Employees for monitoring are trained by instructions. Verified metal detection CP control checks during on site audit and vert. test.
4.10.4 Magnets
Magnets are not used.
4.10.5 Optical sorting equipment
Optical sorting equipment is not used.
4.10.6 Container cleanliness – glass jars, cans and other rigid containers
No glass jars and no rigid containers.
4.10.7 Other foreign-body detection and removal equipment
No other foreign-body detection and removal equipment is used.
4.11 Housekeeping and hygiene
Cleaning is performed by: CSU and own employees.

Documented cleaning and disinfection procedures are in place and maintained for the building, plant and all equipment. Examples cleaning procedures seen included: with frequencies and applied agents and procedures and cleaning schedules.

Cleaning methods described are found to be suitable, Seen plan of 2025.

Cleaning is done as common in the branch: rinsing, foaming, rinsing, disinfection, rinsing. This is done on a daily base. Four of five days alkali cleaning and on Wednesday acid cleaning.

Cleaning records were reviewed in both the traceability exercise and on the factory inspection with no issues noted. Cleaning records detail the cleaning requirements stipulated in clause 4.11.2.

Examples records seen: Seen pre-SSOP's for all areas from reception of pigs until dispatch (expedition). Daily start-up checks with visual inspections are carried out. Actions are followed up correctly direct by own employees or communicated with to be followed up during the next cleaning moment by .

Cleaning is monitored through: visual inspection, residue checks, agar samples and list swaps.
Minor NC on 4.11.3 as the cleaning performance of a crochet cart near the cutting table on the cutting department was not well: Old blood rests and other dirt was seen. (no direct food contact).

Limits of acceptable and unacceptable cleaning performance is defined for food contact surfaces and processing equipment: Listeria absent and agar scores must be ok, in case of higher scores (3 or 4) / own cleaners are informed and resampling is requested.

Limits are set for rinsing water residues for the washing of KJ-crates and other crates. Corrective action is defined on measured pH 8.6 and pH 8.8 on the SSOP.

Areas visited on the factory inspection were observed to be clean and tidy.
Specific cleaning operations seen during the audit: cleaning/ swapping of condense, cleaning in between in slaughter department, which was carried out in most situations conform work instruction and cleaning agent manufacturers instruction.

The following evidence was reviewed:
8-2-2025 1x month 5 samples evaporators and drains, also via pre ssops daily visual check.
Year planning of samples including results of agar /swaps/residue and resampling.
Hand wash agar 4x year, seen results of 12-2-2025 and 14-5-2025 incl. samples of clothing and air pistol spareribs (compressed air) and pistol cutting dep. 4 x, all ok.
List swaps 1 x month, 2025 until June ok, resampling when result is positive.
Cleaning training 2023-02-08 and AT 2023-03-17

4.11.7 Cleaning in place (CIP)

A cleaning in place system is used for the cleaning of the blood vessels and tank (by product outside of scope of certification). Temperature is monitored in ; CIP process blood vessels is verified with agar sampling. Results are all good

4.11.8 Environmental monitoring

The environmental monitoring programme is detailed in: **P-NL-Food-10016 and local file, risk-based sampling plan**
The programme is risk-based and includes frequency of testing, organisms to be included, typical sampling areas and procedures for out of specification results.

The programme monitors for: Listeria, TPC, Enterobacteriaceae
Comment on the results of environmental monitoring programme:
Frequency of testing, procedures for out of specification results are identified and verified. The environmental monitoring verified results 2024-2025 YTD: weekly sampling of parts of the processing areas (40 samples). In generally every department is sampled 1 x 8 weeks. Examples seen of results not ok (3, 4 score), (cleaning company) was demonstrably informed, re-sampling is done and if still not effective, extra measures applied.

A clear review and trend analysis is in place, discussed during morning meetings (huddle) and Tier meetings, recorded in quarter review. Key data and performance are provided as input to the management review (no issues).

The programme is found to be suitable and effective.

The level of environmental monitoring performed is commensurate with the final product risk.

The following evidence was reviewed

- Environmental monitoring programme is in place, part of the micro analyses plan (both for environment as well as the products), risk based and includes the sampling protocol on agar including Listeria in different departments of the factory on identified locations including gutters and coolers.
- Listeria is analysed during environment checks as a CP and monitored every quarter. Q1/2/3YTD 2025.
- Excell file planning / related procedures
- Overview results/ monitoring results /Quarter reviews and management review

4.12 Waste and waste disposal

Waste is categorized in: **meat related and grey waste in production areas.**
All waste containers were identified with contents.

The factory was seen to be clean and tidy with waste well controlled, and no evidence of spillages were observed.

Waste removal is contracted to: Cat 2/3 is removed by Sonac / Rendac (Darling) stored separate and chilled
Trademarked waste materials are not present.
Records of destruction are being retained.
.

The following evidence was reviewed
Other types of waste are paper, carton, plastic, metal, wood, chemicals and residual waste. Company is contracted for the removal of these types of waste.
Waste is identified, collected, and removed from the production areas regularly.
Waste is stored in marked containers in the production and on the premises before it is being disposed of.
No accumulation of waste seen during site tour.
Wastewater is after treatment disposed in the municipal sewage canal. Wastewater treatment is managed by an external company next to the site. Company has a clear policy to minimize the amount of waste.

4.13 Management of surplus food and products for animal feed

N/A

4.14 Pest management

Pest control is contracted to .
The scope is detailed as: rodents, flying and crawling insects.

Presence of infestation during the last certificated period caused by massive building activities. None observed during the BRCGS audit. Infestations are not inside the building and correctly identified and treated.

Routine visits per year: weekly, several areas visited, last visit 2025-08-05
Content of routine inspection: Rats outside, mice inside, crawling insects and EFK devices.
In-depth inspections performed: **2025-02-25 PRI**
Frequency is suitable.

Documentation was well maintained and visit reports fully completed with actions closed in a timely fashion.

The following evidence was reviewed
Pest scan / / dashboard overview results
EVM license valid until 2030-01-27

4.15 Storage facilities

Storage spaces are maintained in hygienic conditions. Waste materials and chemicals are stored separately.

Temperature controlled storage is required, and this is monitored continuously through a central system with alarms when out of set limits.

No products contain allergens, so segregation is not required for allergens.

Chemicals and (packing) materials are stored separately from (finished) products. Electric powdered fork-lift trucks are operated.

Only small stocks of packaging materials are kept on site and stock rotation is via and manual system identifying FIFO usage.

Delivery/Storage record sheets are in place for each raw material & packaging item and are kept at their storage location; seen within the traceability exercise with no issues noted.

No outside storage of goods, only dolavs to be cleaned stored outside. Several silos for slaughtering by-products outside.

No controlled atmosphere storage.

The following evidence was reviewed:
Storage facilities which are temperature controlled by external service supplier and monitored by maintenance
Storage temperatures are controlled automatically via the system.

4.16 Dispatch and transport

The transport of finished goods is all outsourced to external service providers managed by HQ. There are no company vehicles.

Temperature checks and hygiene monitoring controls are in place for: unloading returns (very limited amount) and loading finished product (T loading FP = CCP). This is daily using pre-use check sheets.

Records of evidence were reviewed during the factory inspection and through the auditor vertical audit (see details below)

Vehicles back directly onto loading bays, which are closed with shutter doors when not in use.

The following evidence was reviewed:

- Temperature checks is a CCP and executed 5x per load by competent personnel.
- Seen report 2025-06-19: Vion internal transport audit rit 264753 Set T =2°C temp trailer T=3.7°C, 8 agar checks: temp control recording was checked of whole travell: all ok. 27 of this transport audits are planned for this site:137 audits in total for Vion in 2025.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.4.6	No elevated walkways, access steps or mezzanine floors that are adjacent to or pass over production lines
4.9.1.2	No use of strongly scented or taint forming materials.
4.9.2.2	No uses staples, clips and drawing pins
4.9.4	No product packed in glass of brittle containers.
4.10.2	No sieves or filters in use
4.10.3.5	No X-ray in use
4.10.4	No magnets applied.
4.10.5	No optical sorting equipment installed.

4.10.6	No packing in glass jars or other rigid containers.

5. Product control

5.1 Product design/development

The product design/development procedures are clearly detailed in: **Master Data Management application (MDM)**

There is a process of defining the product brief and agreeing the brief with external customers. HACCP review and sign off, sample agreement, trail review and customer sign off.
Product is mostly minor product adjustments rather than new developments or new materials and allergens. Developments are mostly for customers who provide guidance in each instance.

HACCP team involvement and agreement on customer requirements:
HQ is responsible for product and process alterations, and CAPEX system applies.
HACCP reviews are held and include HACCP assessments made by the HACCP team leader for each new cut. The HACCP team also considers any amendments to standard processes.

HQ reviews process specifications and agrees/discusses information areas with customers before final agreements are made.

Trials:
Trials are agreed between the production manager and customers and regular meetings with customers are in place. Seen validation (not finished jet) of new product /process for China: packing cleaned and washed stomachs on same day as slaughter day, to be stored frozen. This process is planned to be introduced within one month. Approvals of China are finished.

Shelf-life validation:
Shelf-life trials follow documented protocols that reflect appropriate conditions. The process is the same for existing products. Results are recorded and most used is the microbiological sampling plan.

The following evidence was reviewed:
- Microbiologiscal sampling plan
- Micro results of product in the tracetest of same product group by lab

5.2 Product labelling

The following documentation describes the process: P-BXT-NL-10002.

Legislation in countries of sale:
Labels are provided for customers but not consumers. Labels are created and printed on site at the point of application and are basic labels with relevant information only and no artwork; seen on the factory inspection. Country of origin, sequential number, slaughter- and/or production date, Licensed authority number, plus any customer requested information.

The following evidence was reviewed:

- Labelling is according to legal aspects as required by the company; several checks done during production tour and within traceability trial. Bulk products are delivered with product specifications based on customer requirements and legislation aspects. Labelling text is based at product description B-to-B, production date, shelf-life term, country of origin and storage conditions. The system is the ''cloud'', all used label printers are linked to . In the client specifications are taken up the lay-out and content of all labels (for boxes and product). Seen for Article nr. Fresh Pork shoulder.
- Labels seen created all complied with dates and autorithy numbers
- art Trimmings 8020 belly
- Haasjes 2300

5.3 Management of allergens

The following documents form the controls in this area: **P-VION-10000 v19 2025-01-09 and P-BXT-NL-100116**

Allergens handled on site are sow milk and sulphatic in the offal production department. No risk of contamination with allergens as concluded in HACCP analyses.

The risk assessment covers all potential sources, including cross contamination. Measures implemented include: cleaning and segregation.

Claims for individuals:
No allergen claims are made.

The following evidence was reviewed:
The risk of allergens via employee / food stuff is part of the risk assessment. This is controlled with the following measurements: it's not allowed to wear the work coat in the canteen, and all employees need to wash and disinfect their hands before they are entering the production facilities and the wearing of gloves. Allergen management is part of the refresher training for employees and introduction training for new starters.
No claims were made e.g. "free of".

5.4 Product authenticity, claims and chain of custody

Product authenticity is detailed in: **P-NL-FOOD-10049 2024-11-21).**
P-BXT- N-10248 3 Jan 2025 daily verification by exclusive employee specific trained for this Beside this the site is IFS PIA certified.

Knowledge of the Team
The food defence and fraud team are also the site HACCP team. The team has completed relevant training. The use of raw material and supplier risk assessments demonstrated knowledge of the principle of vulnerability assessment.

A food fraud assessment is managed by HQ, using the criteria probability of occurrence vs probability of non-detection. This covers all mandatory requirements of BRC. The vulnerability assessment is documented as Process integrity control plan/assessment date 08.10.2021

Examples raw materials, risk level and mitigating controls:
Significant vulnerabilities have been determined. Examples include:
VKI checks on pigs: FSA, FSA+, FS, IKB (and Standard) QS and SQMS pork meat.
Appropriate mitigation measures are developed and implemented, which include:

Chain of custody audits are done (IFS PIA) by an external certification body (LRQA.

Rasf check and daily check NVWA on site.
Product integrity officer ( ) is coordinating the EKS inspectors
Daily mass balance is performed of GF and GF, Balanced.

A review of the vulnerability plan is programmed to be completed annually.
Date of the last review: **01/07/2025** included in MR

Claims:
A claim is made the Chain of Custody, the chain is communicated, and clear devaluating procedures apply following the IFS PIA audits

The following evidence was reviewed
- IFS PIA audit by LRQA 10.10.2024
- Process integrity control plan/assessment date 08.10.2021

5.5 Product packaging

The packaging materials for finished products are: **naked hanging on oks, naked in crates, in foil, wrapped in foil, in foil vacuumed, in crates, in dolavs in solid board boxes.**

Suitable packing procedures and materials are in place with relevant (food contact suitability/migration) specifications. The packing suppliers are GFSI certified.

Specification and declarations of conformity seen for the packaging used in the traceability test.

The following evidence was reviewed
See traceability/ packing material of trace test / onsite verification during the audit
Packing material specification/ client approval process and management is performed by Head office.

5.6 Product inspection, on-site product testing and laboratory analysis

The testing program is outlined in: P-NLFOOD-10016, Reference procedure: P-BXT-NL-10009 2021-01-14 Product sampling planning
Livestock/pigs are controlled by a veterinarian during the arrival at the slaughter department and during the process in the clean slaughter line (control for diseases intestinal check).

A plan of analysis is available and systematically followed. Product samples are taken from production at the slaughter line (legal compliance) and inline after cutting.
All analyses (hygiene grams, microbiology, pathogens, blood samples, shelf-life water, etc.) are subcontracted to an accredited laboratory operating in accordance with ISO 17025:). A microbiological monitoring program ‘procedure planning monster name 2023 P-BXT-NL-10009 and shelf-life testing programs (P-FOOD-10010 and P-NLFOOD-10165) are in place and were assessed.

Types of tests and frequency:
Samples are analysed on a scheduled basis by an external accredited lab on Salmonella, Listeria, STEC, Staphylococcus aureus, TPC, E. coli and others.

Results of TPC and pathogens (every thousand carcass, so 17 per day) are analysed and reported monthly (KPI reporting). Trend graphs are applied. Results are analysed at trends at a monthly base (Q report). Results of the monitoring programme are part of the quarterly based review of the food safety and quality system. Results are verified: stable trend for TPC; Salmonella, Listeria and Staphylococcus have some positive results, investigated with applied corrective actions regarding re-assessment, personnel hygiene and hygiene of contact surfaces, no need for further action, because of intended use: further preservative treatment before it is fit for human consumption. Application used to find trends and incidents.

The frequency of monitoring depends on the risk:
Carcasses own production: daily microbiological analysis of TPC, Entero's, (pool) Salmonella (process hygiene), Trichinellosis.
Trimmings: daily microbiological analysis of TPC, Entero's, (pool) Salmonella and listeria.
Deboned meat: 1 x / week microbiological analysis of TPC, Enteron's, Salmonella and Listeria.
Technical cuts, by-products and organs: 1 x / 2 weeks microbiological analysis of TPC, Entero's, Salmonella and Listeria.
Sampling process is verified for randomly selected for traceability product lot.

Monitoring for contaminants as heavy metals, dioxins and PCB's, OXTA, PFAS, pesticides and veterinary drug residues is carried out in accredited laboratories up to 4 times a year (and) – results verified no deviations from the limits for the past 12 months.

The following evidence was reviewed:
Trend analyses in Quality Trends of swabs from carcasses do show good results within the limits (regarding to EU 2073/2005) and third countries requirements. Seen Jan-August 2025.

No onsite laboratories

The following evidence was reviewed
Quality trends: seen in digital environment of results analyses.
Document THT shelf-life analyses p food 10165 14-2-2025
Document P Food 10008 2025-04-08 normen voor snit micro HQ
Analyses seen: Nek met been 10 days dry iced TPC/ Ent 17-03-2025 ok
Shelf life 16-12-2024 Bivenbil 13 days slaughterday plus 14,ok (vacuum)

5.7 Product release

The site has ensured that finished product is not released unless all agreed procedures have been followed. Hold and quarantine procedures in place in event of non-conformance. Order wise stock control system is used for release of finished product stock. There is no positive release requirement unless specifically requested by customer.

The following evidence was reviewed
Products are released after the pre-shipment controls (e.g. packing/ temperature/batches), which are carried out by the expedition department. The verification of CCP controls is part of the pre-shipment process. Verification procedure and checklists were assessed during the audit at dispatch and during the vertical audit (F-BXT-NL-10084). Weight checks per lorry with the weighbridge, categories defined for approval of deviating weights.

5.8 Pet food and animal feed

No pet food is produced.

5.9 Animal primary conversion

The vet. certificate is applied for each supplied batch of pigs/farm, which was checked for during the on-site audit and during the vertical trace test. All supervised by the Dutch government NVWA who is on site during working hours. Carcasses are chilled within 24 hours to < 7 ºC and when chilled in fast chiller < 16/17 hours, which was verified on daily basis as temperature before cutting is measured.
Traceability is maintained by scanning / use of ERP system , which was verified during on site audit and the vertical trace test.

Purchasing processes of raw materials (ingredients) and packaging materials are managed by the HQ via approval procedures (incl. GFSI / chain certification status and questionnaires) and contracts. A risk assessment was drawn up by HQ for potential prohibited substances. The Vion plants are only authorised to order products or services from approved suppliers:

- Procedure supplier's audit (P-FOOD-10023) 2024-04-09
- Procedure food supplier assessment' (P-FOOD-10025) 2024-11-19
- P Food 10032 19 dec 2024 supplier assessment Non Food and services.

There's an audit plan for external suppliers, based on risk management. Site Vion Boxtel BV has no external suppliers of pork meat, except the middles from the Vion site in Apeldoorn (also BRC certificated). Product integrity procedure P-Food 10049, supplier risk assessment is a continuous ongoing process. All suppliers are evaluated yearly; parameters are e.g. certification status and quality of deliveries (e.g. illnesses). See also clause 3.5.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
5.2.3	No claims in use to satisfy a consumer group
5.3	No allergens on location as ingredient
5.6.2.2	No testing laboratory on site
5.8	The site does not produce pet food and animal feed.

6. Process control

6.1 Control of operations

The processes covered on the site include:
Pigs receipt preparation (offloading and resting), slaughtering, cooling, cutting, packing, dispatch and waste disposal.

During this audit all processes were in operation and were reviewed as part of the auditor traceability exercise.

Documented procedures and work instructions are in place to ensure consistent product is produced and packed.

There are dedicated logs for each process which include traceability, process steps, process parameters such as times, temperatures and volumes, set up approval (release) and packing.

The product is subject to CCP and CP checks and these were seen (see details below at evidence).

Minor NC on 6.1.3: Temperature of the livers is manual monitored every hour (Product temperature is defined as a CP) before packing to assure the temperature T<=3°C.

No products outside of the scope are handled.

The following evidence was reviewed:
Receiving pigs, slaughtering, cutting, packing and storage before dispatch
Slaughtering process including chilling and cutting to specification. Several cutting handling from carcass to technical parts and to 3rd, 4th and 5 cutting specification. Cooling operation is the most critical process and capacity is in place.
QA monitors aspects of the controls that might affect food safety, legal and quality characteristics.
The control of operations is partly at visual inspection during the process by operators and supervisors. Checks are made at the SSOP forms for process controls, such as temperatures, cutting specifications, pack control.
Via a camera system and the system there's a real time overview at the control of operations.
Daily meetings between management of the slaughtering department and maintenance department.

6.2 Labelling and pack control

There is a clear process and line clearance check for labelling and removal of labelling from the line at a product change over (most labels are printed during packing, so no preprinted labels available on the line.

Records of checks were sampled from previous days and from the vertical audit trail.

At the time of the audit there was no change over on the lines so this could not be witnessed but the process was discussed with the line responsible employee.

There is no online verification equipment for the correct label. (Only B to B labelling)

Label checks take place at the start and end of production batch. During the site audit in several cutting departments the product change is monitored. Eg from backs without bone to backs with bone. The line was stopped, equipment modified and started. No removal of products needed. Labels were changed via the system . Label check of 1st label was seen. No need for change of packaging. .

The following evidence was reviewed
This was checked during the onsite audit and vertical trace test.

6.3 Quantity, weight, volume and number control

Weight control is on weight (kg) as seen on the factory inspection and within the trace exercise and satisfactory. Daily checks of scales with weights. Bulk quantities are sold

The procedure on testing the online checkweigher of the spare rib line was not fully clear. The test results were recorded, but not clear was which deviation of the test weight of 20 kgs. would be acceptable. No clear corrective actions were defined in case deviations were seen during these daily tests.
Beside this daily test by the company, the scales are calibrated by a specialized company on yearly basis.
Minor NC on 6.3.3

The following evidence was reviewed:

- PRE-SSOP daily scale check

Detail: All products are sold by weight, fixed weight or net weight. Multiple weighing scales are in place and subjected to calibration and maintenance programme. Calibration reports of balances were seen. This product is checked for weight and actions are taken accordingly (e.g. repack or dispose). If bulk products are made, then products are weighed at a predefined frequency, and records are kept. Interviews indicate a correct knowledge of actions to take and of legislative requirements. B-to-B product are labelled with real weight, but all weight before loading/dispatch, recorded in the ERP system. Four weighing bridges to weigh all lorries leaving the plot. Weight control for country of sale is organised by HQ for all Vion sites.

6.4 Calibration and control of measuring and monitoring devices

There is a clear schedule of calibration for all equipment. The records of calibration were checked for:

- **Metal detectors, x-ray, scales, thermometers, chemical dosing equipment, CO2 detection devices**

Critical measuring equipment are listed: thermometers (CCP related), weighing scales, fat analyser and metal detection equipment, CO2 stunning. These are calibrated. Records are available.
The equipment used to measure on CCP's is identified. List of measuring devices in place. Calibration due date on equipment. Thermometers 102, 104, 116, 124 seen with valid calibration dates (6x/year internal calibration with calibrated reference device and 1x/year external calibration.

The following evidence was reviewed:
Clear records of calibration were seen within defined limits for all the equipment sampled.
Samples seen and completed to schedule in :
Clear records of calibration we seen within defined limits for all the equipment sampled
1x 2 Months 2025-08-06 , referention 2024-11-05
2025-08-06

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.2.4	No on-line label verification.

7. Personnel

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

Induction training is required for all new employees and includes the company hygiene rules, (incl. HACCP, food defence, allergens and general hygiene rules). There is a yearly refresher training for inductions in place (1x per calendar year refreshment training is scheduled).

Training needs for personnel engaged in activities related to product safety, quality and legality are further defined in a competence matrix.
Employee training is defined in a documented procedure. For operators there are records of sign off against key tasks.

At this visit, the recording of the trainings was seen, performed in the App “Beekeeper”, samples taken of several employees/functions, no deviations seen. Clear competency records were kept in an overview (excel) and refresher training records were seen. End-of-year meetings are scheduled with employees.

There’s an introduction training (incl. HACCP, food defence, allergens and general hygiene rules) for all new and re-entering employees including temporary workers by HR department. Every day new workers are trained, and everyday training capacity is available.
Employees engaged in the control of CCP’s are trained regularly by QA. Employees working in the blue part of the slaughtering department and stable get a dedicated training about animal welfare aspects.
Labelling is trained on the job (no consumer products), labels are generated by the ERP system and scanned, no label, no identification, this was managed well.
For several employees training records are verified, if they fit to their function, incl. the test results of the training followed finishing the training sessions.

Every day new workers are trained, and everyday training capacity is available. Translators are available to help.
Employees engaged in the control of CCP’s are trained once and tested on the job by QA on regular basis (verification of performance of CCP’s control checks are on daily basis performed). Employees working in the blue part of the slaughtering department and stable get a dedicated training about animal welfare aspects. Employees working on packing export products are trained for EKS (once trained and verified regular).
Labelling is trained on the job (no consumer products), labels are generated by the ERP system and scanned, no label, no identification, this was managed well.
For several employees training records are verified, if they fit to their function, incl. the test results of the training followed finishing the training sessions.

The following evidence was reviewed:

- Shiftplan shift schedules
- Training performance/ documentation incl. test results verified for:
- # 2024-01-09 HACCP
- 2024-09-06 HACCP
- # 2023-5-03 HACCP plus CCP ‘s
- # 2024-12-10 HACCP
- 2025-03-25 HACCP plus CCP’s
- 2023-08-22 Animal welfare officer(1x 3 y)
- 2020-02-03 EKS control check /canalisation

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

Hygiene policy is clearly communicated as part of induction programme and displayed on the wall in key areas. All requirements of the Standard are addressed. No deviations from the policy were observed during the audit. Blue, metal detectable plasters are provided in the first aid box.

Visitors are required to complete a questionnaire prior to entrance at the porter office.

Adequate facilities in place. Handwashing takes place at entry of the production area and warehouse area. No issues observed regarding handwashing stations. Staff canteens and consumption areas are segregated from production areas. Hygienic conditions are maintained. No issues observed during the audit.

Changing rooms are located close to production facilities and found to be clean and tidy. Personal items stored in lockers. Company clothing handed out every new working day and on request if dirty. Staff change into workwear on site. Toilets are accessible from the locker rooms, segregated from production. Designated smoking areas are available outside of the main buildings.
No company clothing is worn during coffee/lunch breaks, only hear nets are prohibited.

The following evidence was reviewed

- Visitor registration including questionnaire
- hygiene rules (handed out at the porter to all visitors) P-FOOD-10017
- Effectiveness of the hygiene procedures for personnel is part of the SSOP systematic.
- Samples of each batch metal detectable plasters is demonstrable tested.

7.3 Medical screening

Staff medical screening is limited under national privacy law but executed as enforced by some third countries for export licenses. Reporting illnesses and injuries which might cause a risk to product safety must be reported according to the company hygiene rules.

Visitors need to sign the visitor's logo and therewith declare adherence to the company rules.

The following evidence was reviewed:
Medical screening of employees is arranged if employees do want this
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 during the intake by the porter before entering the site, signature is required. In case of a disease the company is consulting a specialized company doctor. Persons (incl. visitors) who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

7.4 Protective clothing: employees or visitors to production areas

Work wear of personnel includes suitable, protective clothing (including hair/beard nets) that provides adequate coverage. Clothing has no external pockets above waste or sewn-on buttons. Gloves and aprons used in production processes. White and blue clothing is available for visitors.

Laundering of clothing is done by external service provider (professional laundry service). No in-house washing of clothing is done.

Segregation of clean and dirty clothing is effectively managed; there are dedicated closed bins for dirty clothing. Clean clothing is provided in dedicated areas by the laundry service provider.

The following evidence was reviewed:

Acceptance of clean clothing observed an entrance of cutting area.
These hygiene rules are effectively enforced and daily inspected as a part of the SSOP control.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
7.4.6	No items of personal protective clothing that are not suitable for laundering are provided.

8. Production risk zones – high risk, high care and ambient high care production risk zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Equipment and maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification

9. Requirements for traded products
9.1 The food safety plan - HACCP
Not applicable
9.2 Approval and performance monitoring of manufacturers/packers of traded food products
Not applicable
9.3 Specifications
Examples of traded products: <list some examples of traded products> All traded products within the scope are included: Yes/No Specifications are reviewed every three years: Yes/No The following evidence was reviewed:
9.4 Product inspection and laboratory testing
Not applicable
9.5 Product legality
Not applicable
9.6 Traceability
Not applicable

Module 11: Meat Supply Chain Assurance	
Scope	Click or tap here to enter text.
11.1 Traceability	
Click or tap here to enter text.	

11.2 Approval of meat supply chain
Click or tap here to enter text.
11.3 Raw material receipt and inspection
Click or tap here to enter text.
11.4 Management of cross-contamination between species
Click or tap here to enter text.
11.5 Product testing
Click or tap here to enter text.
11.6 Training
Click or tap here to enter text.

Module 13: Meeting FSMA Requirements for Food – July 2022
Preventive Controls for Human Food: 21 CFR Part 117 (Clauses 13.1.1 – 13.1.33)
Click or tap here to enter text.
Preventive Controls for Animal Food: 21 CFR Part 507 (Clause 13.2.1)
Click or tap here to enter text.
Food Defence: 21 Part 121 (Clauses 13.3.1 – 13.3.11)
Click or tap here to enter text.
Sanitary Transportation: 21 CFR Part 1 Subpart 0 (Clauses 13.4.1 – 13.4.9)
Click or tap here to enter text.
Produce Safety: 21 Part 112 (Clauses 13.5.1 – 13.5.18)

Click or tap here to enter text.

14.1 Additional Specifier Requirements
14.1 Traceability
Click or tap here to enter text.
14.2 Environmental Monitoring
Click or tap here to enter text.
14.3 Product inspection and laboratory testing
Click or tap here to enter text.
14.4 Protective clothing: Employees or visitors to production areas
Click or tap here to enter text.