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

1. Audit Summary			
Company name	Distrifresh Coldstore Den Bosch	Site code	10007268
Site name	Distrifresh Coldstore Den Bosch		
Scope of audit	Plate, crate and box freezing of unpacked and packed red meat. Packing of red meat in crates, carton boxes and foils. Tempering of packed red meat.		
Exclusions from scope	No		
Justification for exclusion	Na		
Audit start date	2024-08-12	Audit finish date	2024-08-14
Re-audit due date	2025-08-09	Head office	No

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	B	Choose an item	Audit programme	Announced
Previous audit grade	A+		Previous audit date	2023-04-24	
Certificate issue date	2023-05-30		Certificate expiry date	2024-09-20	
Number of non-conformities			Fundamental	Click or tap here to enter text.	
			Critical	Click or tap here to enter text.	
			Major	Click or tap here to enter text.	

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2. Audit Results

	Minor	13

3. Company Details

Site address	Goudenheuvel 51 5234 GA ‘s Hertogenbosch		
Country	Netherlands	Site telephone number	[redacted]
Commercial representative name	[redacted]	Email	[redacted]@distrifresh.com
Technical representative name	[redacted]	Email	[redacted]@distrifresh.com

4. Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	1-50	No. of HACCP plans	1-3

Shift pattern	24/7 open, 1 shift and 2 shifts (sometimes extended working hours per shift)	
Seasonal site	No	
Seasonal opening times (Start/end date)	-	-
Other certificates held	Beter Leven (BLK), Organic (SKAL), IFS PIA	
Outsourced processes	No	
Outsourced process description	NA	
Regions exported to	Europe	

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4. Company Profile	
	Asia Africa South America North America Oceania
Company registration number	NL543 EG
Major changes since last BRCGS audit	This was a takeover audit from SGS

Company Description

Distrifresh Coldstore Den Bosch is situated in ‘s Hertogenbosch (the Netherlands) and belongs to the Vion Food Group since 2022.

The company is specialized in plate, crate and box freezing of unpacked and packed meat and tempering of red meat. There are 3 plate freeze lines connected to one conveyor belt equipped with a metal detector and a robot palettized at the end of this line. One variable cell used for tempering, one area for packing fresh or frozen meat products with one-line conveyor belt and multiple weigh units. One automated robot pack-line with metal detection of frozen products in use. Four segregated units of shock freeze cells – mainly in use for pallet/ crate freezing.

One HACCP-study according to scope. Building is from year 1986 and extended in 1994. Building is hired from the formal owner.

Main processes are.

1. Plate freezing of raw red meat products (parts of pork meat, organs and separator meat, frozen blocks are metal detected and a palettized at the end of this line palettized by a robot and pallets are covered with foil on pallets covered with foil.
2. Packing parts of meat in carton boxes (with foil inner liners), meat is fresh, chilled delivered in bulk boxes (dolav’s). Boxes are shock frozen, metal detected and at the end of this line palettized by a robot and pallets are covered with foil.
3. Shock freezing of red meat deliverd packed in carton boxes, and after freezing boxes, boxes are metal detected and a palettized by a robot and pallets are covered with foil.
4. Tempering of packed red meat under special conditions in a special freezing area / cell, all planned in time on request of the customers

All frozen products are metal detected. After freezing and palletising, products are stored frozen, (min -18C) and loaded in trucks or containers (conditioned temperature) before dispatch.

Only B to B products is handled.

The company works 24/7 on the plate freezing department. Other departments are working in 1 and 2 shifts, shifted shifts, sometimes shifts of 10 h., also depending on workload and availability of employees.

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4. Company Profile

Employees working of which in night shift. (all incl. temporary staff). Plant size is about m2. Calculation was 24 h but because of working on shifts, performing same processes, reduction of 4 h, in total 20 h audit on site. No high care/ high risk zones.

The company is IKB, Organic and IFS PIA and EKS certified. NVWA legal veterinary registration number is: NL543EG. Last visit by Dutch Food Safety Authority NVWA. Regular, almost weekly visits to confirm export certificates. EKS program in place to allow for sampling based on history instead of 100% control. The emergency number +31 88 99 53 555

Al products are owned by Vion Food Group Boxtel, transport is also arranged by Vion Food group Boxtel, no own transport. Request for tempering products is also managed by Vion Food group Boxtel.

There is a local BT team with 5 members which is also the HACCP-team.

Annual production volume / turnover is not specific shared. No outsourced processing and packing.

This was a takeover audit as previous CI was SGS. Company is no longer BRSGS S&D certified. The audit was performed announced conform BRCGS requirements v9, next audit also to perform announced.

The audit was completed after the due date within the automatic concession period of 7 days and as a result no Major NC needs to be raised.

5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category
Finished product safety rationale	Chilled red meat products (<=3°C, <=4°C or 7°C, short shelf life), tempered red meat (-8°C until -12°C) and frozen red meat products (<-18°C, long term shelf life)

High care	No	High risk	No	Ambient high care	No

Justification for area	Appendix 2 applied. All products must undergo full cooking step prior to consumption

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5. Product Characteristics	
Allergens handled on site	None Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	Organic and BLK
Product recalls in last 12 months	No
Products in production at the time of the audit	Plate freezing of pork meat, palletized, packing pork meat into carton boxes, palletizing of plate frozen pork meat, palletizing and de palletizing boxes (process for shock freezing) Tempered meat seen in the storage under controlled conditions.

6. Audit Duration Details			
Total audit duration	20 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	Same work performed in shifts (1/2/3) 24/7		
Combined audits	None		
Next audit type selected	Announced		

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
[redacted]	Operation manager	x		x	
[redacted]	Site manager	x		x	x

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	QA manager I/O	x	x		x
	Group QA manager	x		x	x
	Planning	x		x	
	Maintenance engineer	x	x	x	x
	Maintenance manager	x		x	
	Ops. manager	x			
Employees e.g.	Expedition, operations/cleaning/dispatch		x		
	HR			x	
	Warehouse supervisor		x	x	
	Warehouse supervirsor		x	x	
	Order picken		x	x	
	CCP temperature, employee exp.		x	x	
	Fac service		x	x	

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2023-04-24	BRCGS Food issue 9	Unannounced	Pass
2022-07-12	BRCGS Food issue 8	Announced	Pass
2021-08-09	BRCGS Food issue 8	Announced	Pass

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Document control				
CB Report number	6250442			
Template name	F908 Food Safety Audit Report Template			
Standard issue	9	*Template issue date*	2022-12-16	
Directory allocation	Food	*Version*	1.1	

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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

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Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
2.5.1	Flow diagrams are drawn up and checked demonstrably annually. However, these flows were found not fully complete as the process on plate freezing and shock freezing were found not fully complete.	The flow chart for plate freezing and shock freezing have been adjusted. P-DDB-NL-10013 Flowcharts Distrifresh Den Bosch See 2.5.1 for the recently updated flowcharts. *Fully closed*	Transferring the handbook to Quality online will ensure that an annual audit is conducted, not only by local QA, but also by an external reviewer. All flowcharts will be revised to establish a renewed quality system. *This will be ready by week 40.* In addition to this, Distrifresh Den Bosch will go through the process diagram and process management plan for changes every week	Because Distrifresh Coldstore Den Bosch is in the process of transitioning from the old vay of working to the Vion method and they have not yet been able to adapt all facets of the manual, the flow charts are not yet completely up-to-date.	2024-09-12	

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Minor						
			during the BT. This will be noted in the HACCP meeting minutes. *This will be done at the next HACCP meeting on 18-09-2024.*			
2.7.2	The whole documented HACCP system is in transition now, as the company is working on implementation of the Vion food management system in [redacted] This transition causes that some items were not fully included in the risk analyses. For example, risk analyses on reception of packing material was not described fully and the description that metal detection is only used on client request but in real, all products are metal detected as this is	Using the flow diagrams to prepare the process management plan. Working according to P-VION-10000 'Procedure Hazard analysis' and P-VION-10001 'HACCP manual' which means missing pos. risks are included now. Proc. Metal detection is valid: See 2.7.2 for procedure metal detection. *Closed to be verified on site*	Transferring the manual to [redacted] will ensure that an annual audit is conducted, not only by local QA, but also by an external reviewer. In addition to this, Distrifresh Den Bosch will briefly go over the process diagram and process management plan for changes every week during the BT. This will be noted in the minutes of the HACCP meeting. Complex procedure P-VION-10000 'Procedure Hazard analysis' and P-	Because Distrifresh Coldstore Den Bosch is in the process of transitioning from the old [redacted] way of working to the Vion method and has not yet been able to adapt all facets of the manual, the process management plan is not yet fully up to date.	2024-09-12	

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Minor						
	following the Vion procedures.		VION-10001 'HACCP manual' will be reviewed and made easier to read before 1 Jan 2025. *This will be done at the next HACCP meeting on 18-09-2024.*			
3.8.1	During check of reception of fresh meat, temperature of some dolav's was 8,3°C, too high target is max. 7°C. The 3 dolavs with pork meat pieces, were stored separate in the cooling storage cell 2, but were not handled as described in the blocking procedure. The dolavs were not demonstrably asked as Blocked.	Meat was set aside and blocked. Complaint sent towards the supplier. *Fully closed*	A label has been created ir. which employees can print and attach to each blocked pallet. (see Appendix 3.8.1) This has been instructed to employees. List 45_40 updated with blockage check and is checked daily during SSOP. The receipt check will be re-instructed to the staff, this will be done using the updated instruction, because the temperature check and operations	The receiving end of fresh dolavs lacks the knowledge and training of employees. This is also insufficiently verified by the department leadership.	2024-09-12	

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Minor						
			from week 38 will also be seen as CCP. *This will be realized in week 40*			
3.9.1	Packing material is delivered by other Vion sites (to entry check was performed at other sites). Material is used FIFO, based on delivery and supplied coded. The traceability procedure was not fully complete as the way how packing material could be traced internal at this site was not fully clear described.	Procedures have been established and implemented to ensure the traceability of the packaging material. P-DDB-NL-10011 Tracking of packaging material. P-DDB-NL-10012 Receipt control of packaging material. F-DDB-NL-10009 Receipt control packaging material. F-DDB-NL-10010 Traceability Packaging Materials *Closed to be verified on site*	A list has been created on which employees can sign off daily which batch is used of each packaging material. This allows traceability on a daily basis. In addition, mid-November they will start using SAP to map the entire non-food stock and book it off using scanners. This will make it possible to track exactly when which packaging material has been used. *This will be set up before January 1, 2025.*	In the past, the trace of the packaging material was in operation through the WMS Due to the employees not being properly instructed on how to act according to the correct procedure and the subsequent frustration of this, the decision was made not to continue this. A replacement solution is being considered after this decision, but no replacement option is demonstrable during the audit.	2024-09-12	

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Minor						
3.9.3	Traceability tests are performed annually bottom up and top down. However, during these trace tests, the tracing of packing materials was not performed (as this was not included in the procedure). During the trace test initiated by the auditor, the traceability could be proofed.	The traceability of packaging materials has been included immediately in procedure P-DDB-NL-10011 'Tracing packaging materials' and process has been checked. This proves will be evaluated and verified during the next trace test on September 30, 2024. Trace test will proceed according to Central traceability test procedure. *Closed to be verified on site*	By adjusting Distrifresh' s trace procedure, to the Vion standard and adjusting the ability to trace packaging material, it will prevent the failure to trace packaging material during a trace test.	Because the wrong procedure was followed and the packaging material was not correctly traceable, it was not included in during the trace test.	2024-09-12	
4.4.4	The overhead protection of the climate installation in the packing area and near reception door 10 were showing rusty parts, start flaking off paint.	Areas cordoned off and cleaned, to cleaning and repair of evaporators. Evaporators were repaired and repainted. See images 4.4.4 *Fully closed*	By introducing and thereby creating a clearer and more accurate preventive maintenance plan, deviations to the premises and equipment will be remedied in a timely manner. *will be integrated within Distrifresh*	Due to the lack of a clear preventive maintenance plan showing all Technical parts present within Distrifresh Coldstore Den Bosch, evaporators were not provided with a new coat of paint in a timely manner.	2024-09-12	

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Minor						
			Coldstore Den Bosch by January 1, 2025.			
4.4.7	In the forklift battery charging area, a ventilation opening in the wall / outside was not working, Not fully clear was if this opening was adequately screened to prevent the ingress of pests / flying insects.	Screens are installed between the fan and indoor environment. See Figure 4.4.7 *Fully closed*	During the next pest audits, QA & TD Distrifresh Den Bosch will be present in order to gain more insight into the shortcomings of the premises with regard to pest control.	There did appear to be a mesh in the fan. During the requested pest audit, 2024 was not walked along by QA. Also, this anomaly was not noticed during previous company hygiene and technical rounds.	2024-09-12	
4.4.10	Condensation was seen in the meat packing area (Underneath the protection of the belt) and in the reception area of fresh meat (on the ceiling/ pipework near the ceiling, near plate freezers)	The areas were cordoned off and immediately mopped, after which the areas were released in agreement with supervisors. Monitoring instructions communicated. *Closed to be verified during next on-site audit*	There is a Pre-SSOP for the plate freeze, it will be tested for operation and implemented. *Realized for week 39.* Condensation control procedure will be established, and employees will be trained using this procedure. *Realized before week 40.*	Because the procedure condensation control is not fully developed.	2024-09-12	

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Minor						
			The risk spots have been mapped, the procedure has been revised accordingly, the necessary tools have been inventoried and installed, employees have been trained. Structure of this can be seen in appendix 4.4.10. *Full realization before December 1, 2024.*			
4.7.6	The engineering shop is connected to the loading platform/ storage of packing material. No control measures were implemented to prevent transfer of engineering debris to this area.	A floor mat has been installed between the transition from technical room to the expedition. See appendix 4.7.6 *Fully closed*	The current space for storage and work TD will be adapted / arranged to comply with laws and regulations. A plan will be created for this space so that structured and recorded decisions can be made. Within this plan the frequency of the cleaning of the mat will be	Because the technical area has been moved from the battery charging room to a new location, Distrifresh has not yet had time to fully and properly set up this area.	2024-09-12	

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Minor						
			assessed and implemented Latest realization date 28-10-2024			
4.11.2	In the cleaning procedure/ plan the weekly cleaning of the plate freezing installation was missing. Verification of the cleaning performance was seen and was found suitable.	has updated the current cleaning plan and added cleaning of the plate freezer department. See appendix 4.11.2 *Fully closed.*	A new cleaning plan and schedule will be drawn up in consultation with In addition, a monthly meeting will be scheduled in which the current cleaning, procedures and points for improvement will be discussed. Minutes will be kept and discussed during the quarterly review. *The first consultation is scheduled for 13-09-2024.* Also, will be connected to the mailing regarding AGAR results.	During the acquisition of by Distrifresh, a general cleaning plan was drawn up. This plan was not complete, current and in place during and before the audit period.	2024-09-12	

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Minor						
			First Agar and residue results will be sent on 17-09-2024.			
4.15.3	Temperature control is required for raw materials which are received and are stored in 4 cooling cells before plate freezing. To remain the correct product temperature (as different kind of products are handled: (Temp max 3, max 4 or max 7 C), the storages connected to the production and reception areas) must be closed as much as possible as the "production area temperature was around 8-14°C. During the on-site audit, the doors were not closed during non-working hours.	Door was closed immediately after observation. A4 card on door with "Close door" visual instruction + instruction to employees were given. See 4.15.3 *Fully closed.*	Temp settings rechecked and set with lower alarm value and shorter alarm time of 60 minutes. SSOP check temp fresh storage + doors closed. Training employees *Completion Week 37*	Due to the hectic nature of the day, this was diluted during the tour with the auditor. This item was not described in the SSOP checklist.	2024-09-12	

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Minor						
5.6.1	Final products are not tested, no scheduled program for product testing was available, only a program for environmental checks as all products are frozen, are analyses intercompany (by the supplier /VION sites) and do have a long shelf life. Environmental checks show no issues. However, no substantiation of the absence of a sampling plan on the products handled on site could be shown.	Sampling plan is Risk based reviewed and implemented in preparation for the preventive measure. No high risks identified. This will be reviewed again after implementation of the preventive measure and adjusted as needed. See 5.6.1 for the reviewed procedure. *This will be done using the data in week 45.*	Product testing for microbiology and hygiene control by TPC and Entero's analyses. A schedule will be made for each department. Product samples for packing and plate freezing on production days, so that the trend can be determined, and one can validate the cleaning. In addition, a number of products will be sampled quarterly by department. These products will be separated into different groups. Trimmings, organ and cheeks. Beside product sampling/ analysing also environmental checks are reviewed: This will allow packing and plate freezing to be validated for cleanup.	Distrifresh Den Bosch conducts its own environmental research by means of water research, research into total KVE, and listeria, Distrifresh shows that the environment, after cleaning, meets the established specification. Because the products that are packaged and frozen are not the property of Distrifresh Coldstore Den Bosch, it was decided not to take additional product samples.	2024-09-12	

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Minor						
			This will be completed by week 45.			
7.4.1	In the areas where “naked product” is handled, the employees wearing white company clothes. During the on site audit, employees were seen in other areas” still wearing white clothes, as they did not follow the correct routing towards changing rooms.	A new floor plan has been prepared showing the walking routes in terms of personnel wearing white clothing. Furthermore, the procedure P-DSF-NL-10062 for this has also been rewritten. See appendix 4.3.4 *Fully closed*	Production workers will receive a repeat on basic hygiene training. This includes the walking route production clothing. *For week 40* Furthermore, markings will be placed on the floors behind which employees wearing white clothing are not allowed to go. This will also be instructed to production department employees. *Realized after the next 6 weekly maintenance. Deadline 04-11-2024*	Because the packing department is located in the middle of the building, employees will always have to walk through the shipping department in order to work in this department. There is a hygiene lock at the entrance to the department. However, there were a number of employees who were not fully instructed regarding the walking routes with white clothing.	2024-09-12	

Comments on non-conformities
-

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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

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Audit team

Lead auditor		
Auditor number	**First name**	**Second name**

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 assessor	2024-08-12	13.00	17.30	Physical	
			Lead assessor	2024-08-13	08.30	17.00	Physical	
			Lead assessor	2024-08-14	08.30	15.30	Physical	

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1. Senior management commitment

Policy
The site policy is documented in: **P-DDB- NL-10000 5 Jan 2024**
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 including:

1. Food safety
2. integriteit
3. work strategy/ feedback employees
4. communication
5. standardised working methods
6. training and eucation
7. Q4 2024 end goals actions defined incl. a roadmap and gaps to be filled

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 and training program, meetings)
The culture improvement plan is documented in: **FSC plan 2024-08-07.**
Activities undertaken, involving all sections of the site: personnel survey, workshops, year-end meetings with personnel, food safety training, whistleblowing policy, sign up to business code of conduct.
Success of the plan is measured through monitoring of actions taken during monthly management meetings, last meeting minutes seen 2024-07-31.
Plan is ongoing. During this audit, the implementation of this plan was also verified on the factory floor and all other departments that were audited.

Frequency of reviews: min. 1 x year
Senior management were able to discuss the plan during this audit (spoken to Operational Manager).

Food safety and legality objectives in QA matrix which will be updated the coming months as Vion start to manage KPI's trough a new system in QA -online.
Notable food safety and quality objectives include e.g.:
-Min BRC score A
-Complaints max 5, no FS related complaints
-Integrity 100% (Canalisation of meat)
-Food safety culture goals (see above)

Objectives are monitored monthly by QA and BT team
Key results or significant trends: the site is meeting established objectives / effectively progressing through its objectives.

Management review
Frequency of management review meetings: 4x year during Quarterly reviews following the Vion format.
All required items are discussed.
Who typically attends the meeting: Local business team is attending these meetings, e.g. local site manger, local Manager, supervisor warehouse.
Date of last management review meeting: **31/07/2024**

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How minutes and actions are communicated to staff and recorded: Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. Employees are informed via their supervisor, BT meeting 1 x week, seen minutes of 2024-07-31.

Regular meetings
Routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. As the company has a small team, short lines are resulting in beside 1 x BT meeting also informal meetings during the week when necessary.
How minutes and actions are communicated to staff and recorded: emerging actions are discussed in BT, weekly meetings and informal meetings within the small team. Management meetings are held min 1x month. Minute meetings reviewed, 31/07/2024

Previous nonconformities
All previous non-conformities have been closed out suitably, this was checked for although this was a take over from
Thorough root causes are identified through application of discussions and brainstorm sessions during management meetings. Preventive actions are effectively implemented to prevent re-occurrence. A CAPA excel list is maintained.

Organisational structure, responsibilities, and management authority
The site organization structure is documented in: **Organogram DF Coldstore Den Bosch V01 2024-07-22**

Management structure:
The senior management has appointed qualified employees for key functions. Responsibilities and competences are detailed 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. Substitutes have been clearly appointed in case of absence of the responsible person. Current structure and reporting are up to date.
External expertise is used, Vion group QA manager is supporting the local QA team. Vion is also supporting the internal audit programme which is conducted by trained internal auditors of other Vion locations.
Overall responsibility for the day-to-day management of the food safety system is with the Operations Manager.

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 support of head office Vion.

A whistle blowing system is in place, whistle-blower procedure d.d. 2020-Sept., code of conduct Vion P-Vion-10017 2022-03-21: 3; reporting issues via HQ or via an external contractor Navex.

The following supporting evidence was reviewed:
See above.

Details of non-applicable clauses with justification

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Clause/Section Ref	Justification

2. The Food Safety Plan – HACCP

There is one HACCP manual described as the: **P-Vion-10001 29 Dec 2014**

The company is in a transition now as the previous QMS was no longer fully compliant anymore, the consultant is no longer working for the company. As the company is taken over by Vion, the company is integrating the QMS to the VION system i ith help of the group QA manager of Vion Boxtel.

The food safety team is detailed in: **P-DDB-NL-10010 2024-08- 12** Members of the Food safety team are the site manager, operation manager, QA manager, Maintenance manager and the controller and facility manager attend meetings when applicable. 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 QA manager who is' working now for a few years in the food industry and is supported by Vion Group QA manager. The other members all had appropriate training and experience. Training records were sampled and found sufficient.

Scope of HACCP
The HACCP system scope is documented in: **P-DDB_NL-10001 29 Aug 2023 Procedure Bedrijfsinformatie (company information). The processes are defined all gathered in one HACCP analyse. The processes are conditioned storage, production of meat (including plate freezing and packing), freezing and storage**. It covers relevant processes and all products on site.
More vulnerable groups have been identified. Product is sold B to B.
Product descriptions are detailed in: P-VION-10000 29 Jan 2024 Procedure Hazard analyses. Relevant information is described and information on food safety is included.
The scope accurately reflects all products on site.

Process flow diagram.
Record key process steps/operations to manufacture products within the scope of certification:
For each part of the process, flows are established which are the basis for the HACCP Risk analyses.
Seen:
PROD_1000 v10 2021-11-29, Ontvangst - reception of goods.
PROD_1005 v02 2021-11-29, Opslag geconditioneer d-, storage conditioned
PROD_1020a v01 2018-12-20 Inpakken vleesproducten (met metaaldetectie)– Packing meat products *including metal detection*
PROD_1023 v02 2016-09-09 Algemeen, processen - general overview processes
PROD_1700 v08 2021-12-03 Laden - Loading
PROD_1750 v05 2016-09 Tempereren en reconditioneren – Tampering and reconditioning
Prod- 1120 22-05-2024 verpakken van vlees //packing of meat

The flow diagrams are drawn up and checked by the HACCP team demonstrably on annual basis.
Record date and reason of last verification: **1 July 2024**
Q review: parts are reviewed by MR which is managed also 1 July 2024

However, these flows were found not fully complete as the process on plate freezing and shock freezing were found not fully complete. ***Minor NC on 2.5.1.***

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Hazard analysis PBSD-1250 06-03-2024
HARA is based on comprehensive information sources**.** A VION central PRP and CCP plan is the basis for the local HACCP plan (P-FOOD-10000 PRP's and additional CCPs' and CP's is regularly updated). The hazards are part of this document (incl. microbiological (esp. pathogens, with Salmonella as higher risk (therefore temperature at receiving is a CCP), chemical, physical (incl. radioactivity/ radiological hazards) Severity vs likelihood is considered, all in basic managed and supported by QA of HQ Vion Boxtel.
No allergens on site.
The local HACCP plan (process beheersplan) is last updated **Hazard analysis PBSD-1250 06-03-2024.**
Severity vs likelihood is considered in a general document maintained by head office of Vion.
Each identified hazard was reviewed and given a risk rating 1 to 9 (severity and likeliness of a hazard occurring = 3 x 3 matrix). A decision tree is used. A set of flow diagrams is part of the HACCP documentation (see above). The processes are shown on flow diagrams for each process, all checked during this on site audit.

CCPs, limits and controls
At this moment one CCP is valid (this was before an OPRP): **PROD 1010 2024-02-26, CCP monitoring 2024-08-07.**

#	CCP	Control measure	Critical limit	Monitoring frequency
1	Temperature of meat at reception of meat packed in carton boxes	Temperature measurement at reception of packed meat in carton boxes to be (shock) frozen directly after reception.	• Fresh packed meat in carton boxes • T ≤ 7 °C core temp.	5 measures of each batch received (2 measurements at start 1 in middle and 2 at the end).

Several (o)PRPs have been identified in: **PBSD_1110**. Control measures have been defined. This includes e.g.

1. Reception temperature of fresh meat in dolav's
2. FIFO delivry of plate frozen meat and packed meat
3. Icross contaminition (cleaning& disinifection)
4. Foreign bodies
5. Peronal hygine
6. Fallen meat
7. Condence
8. Metal detection frozen meat
9. Contaminated meat products
10. Pest control

As mentioned, the whole documented HACCP system is in transition now, as the company is working on implementation of the Vion food management system ir . This transition causes that some items were not fully included in the risk analyses. For example, risk analyze on reception of packing material was not described fully and the description that metal detection is only used on client request but in real, all products are metal detected as this is following the Vion procedures. ***Minor Nc on 2.7.2***

Examples of corrective actions:
Verified on site on 2nd day of the on-site audit.
Actions when monitoring level exceed acceptable limits are documented within the HACCP plan, recorded and investigated. Based on live demonstrations and records checked during this audit, the CCP is in control conform the work instructions.

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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 of 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).
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 CCP.

Frequency of planned HACCP system review (at least annually): 1x year
Date of last review: **1 July 2024**
Completed by: QA manager local Distrifresh Coldstore
Reason for completion: **Company is in a transition of QA system, transition from own QA manual to integrated Vion QA manual in**

About integrity, this is in control, since Jan 2024 EKS qualified again, all controlled by the company together with the Dutch NVWA.

The following supporting evidence was reviewed:

Documents in Foods connected
PBSD-22000
PBSB 1290 HACCP RA,
PBSD 4000 canalisation (traceability)
Last HACCP meeting minutes 2024-07-31
Site plan List B-210 v05B
Validation reports new/adjusted packing line/ equipment/area 9 August 2024

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: Document seen ALG-1700 2024-07-02.

The Food Safety & Quality Manual 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 and when needed in English and Polish. Interpreters are available should they be

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required. Documentation seen is up to date. Only QA can make the changes into the system. Changes are indicated in (date of chage, name by whoom this document wasa changed and the topic/item which was changed) which contains only the last valid version the documents.

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 as a minimum for the shelf life of 2 years plus one year.

The following supporting evidence was reviewed:
This was checked for e.g. F_DDB-NL- 10007 16-5-2024 PRE-SSOP inpak changes and approval are documented automatically, yearly review of documents is atomised, remark together with HACCP team, this is included in the validation system to validate each document yearly.

3.4 Internal audits

The following document(s) define the process: **P-Vion-10011, no version date as document is in approval status as this document was changed recently, last up to date version was from 2023-11-27**
The audits generally follow BRCGS v9 guidelines and clause structures.

Internal audits are conducted: 4 x year of which 2 announced, one unannounced internal audit and 1 self assessment against BRC standard incl. internal policies. The programme of 2023/ 2024 was seen and 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 internal independent auditors, trained by Vion head office.
Auditor competency has been demonstrated through training records, sufficient knowledge of the products and processes and experience, which was verified for internal auditors

Internal audits are reported in: **central Word format, reviewed yearly and adapted to the schemes if changes occur**.

The reports reviewed detail conformity as well as non-conformity. An amount of minor nonconformities and 2 majors have been raised with no trends identified. Root cause conducted by brainstorm session is included where required. All actions were closed within the due date. Audits contained a basic amount of detail. Follow is demonstrable in the audit report forms. Verification is conducted by the next internal auditor (independent). Timescales have been drawn up for follow up and verification.

Internal audit reports reviewed during this audit:
2023-11-24 Unannounced internal audit (Q4 2023)
2024-01-16 NVWA system audit (external)
2024-01-17 IFS PIA audit (external)
2024-02-21 BLK audit (external)
2024-05-23 Internal audit self assessment (this audit was planned earlier in the year but because the consultant was no longer available, this audit was demonstrably postponed 2 months)
2024-06-24 Announced internal audit: report finished 2024-07-10, 8 minors, 2 majors. Seen Major of audit number AM-581-AUD-06-F01 (BRC 7): RCA was performed, follow up is performed ir : due date is 25 Aug. 2024 Major (max30 days). Majors followed up in , all other deviations / minors directly in the report documented to be followed up by the auditor and sent back with comments.

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2024-07-10 Announced internal audit, 2 majors (1 upgraded minors of previous IA which were not solved fully jet, but not over due) and 8 minors, of which condense on packing department which was solved.
In Q4 2024 following the audit plan an unannounced audit will be conducted.

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.

A separate program of internal inspections of factory environment and processing equipment is undertaken Daily checks are performed, started from Jan 2024 documented in SSOP's per department. Hygiene is checked on daily basis, each area/ department/process has its own form to document this:
This was verified for the dates on 9-8-2024,12-08-2024 and 13-08-2024 for
Expedition 5-6, reception of raw meat in dolavs, storage of meat before plate freezing or packaging boxes, robot line, tampering, plate freezing process, packing blocks plate frozen products, Exp 1-2, packing area, shock freezing, reception packed meat products.

This is reported in: **List checklist Productkwaliteit alle ruimtes 045-040 v30 24-06-2024** .
Actions directly communicated with team leaders and employees, re-check next day if deviations were seen, checked again after actions taken and follow up was recorded on the same list. If needed escalation towards HACCP team. Completion of actions is verified upon the next inspection by QA. Effectiveness of the system is discussed in the Management Review (X-matrix).

These checks (by paper form) will be digitalised, implemented ir ,urther this year, escalation is easier to manage by email notification in case verification was out of specification/target.

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: setup centrally by HQ in Boxtel.

Risk identification / risk assessment related to raw materials resulting in product specifications specifying relevant aspects to quality and food safety (CP). As the meat suppliers are all within the Vion company, all approved GFSI certified suppliers (intercompany). No additives are used.
No high-risk food suppliers identified for this organization. For packing material, Approval of suppliers based on GFSI-certification. All suppliers of packaging materials have to be approved by the central Vion office entered into the system) before they are allowed to deliver. Supplier questionnaires used too. Some additives from the brine delivered by trading companies.

The company's raw material risk assessment, including primary packaging is documented in: List suppliers' additives Vion Food NL (S-MMI-10190), List of approved transporters (S-MMI-10013) and 'List of approved cold stores in use by VION (S-MMI-10199), yearly demonstrably reviewed by Vion HQ

All potential risks have been appropriately considered.
No significant risks include for this site applicable.
The risk assessment forms the basis for the raw materials acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.

Reviewed during the audit according to the last updated evaluation included in the MR, packing suppliers are all GFSI certified:

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- ,packaging,GFSI cert performance ok
- GFSI certified, performance ok

Supplier approval 29 Nov 2023 P F00D 10026 is managed by VION central PNF
Supplier Evaluation process: P Food 10032 2024-04-19, last performed evaluation 2024-04-18.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The following evidence was reviewed:
On receipt the raw materials were assessed conform procedure ref. PROD-1010 issue 10-11-2022, verified receipt records and explanation by interviewed person gave enough evidence for a correct implementation. Seen record keeping on issues like temperature, correct labelling, BLK, best before, damaged packaging etc. In case there were deviating deliveries remark for personnel goods receipt was made.

Procedures for the acceptance of raw materials and primary packaging on receipt is in place and based on risk assessment (see 3.5.1). The meat is owed (delivered) by VION Head Quarter, al fresh provided by intercompany sites (GFSI certified).

Acceptance by receiving checks:
Deliveries are visually checked for product integrity, labelling and cleanliness, incl. temperature control and visual inspection on FB/s. This is all recorded per delivered Batch. Products receive per packed unit an SSCC code at reception. (traceability).

The requirements to be met for acceptance is identified for all raw materials (including primary packaging). Parameters for acceptance and frequency of testing has been clearly defined, implemented, and reviewed during day 2, reception by expedition.

3.5.3 Management of suppliers of services

The following services are used and assessed:

- Pest control
- Laundry services
- Contracted cleaning
- Transport
- Temporary employees

Supplier approval, monitoring and evaluation process documented (referenced under 3.5.1) in List of approved transporters (S-MMI-10013) and ‘List of approved cold stores in use by VION (S-MMI-10199). Seen the last updated evaluation 06.12.2023.

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

Quarterly management review Q2 -3 include performance of suppliers of services and feedback.

Supplier approval 29 Nov 2023 P F00D 10026 is managed by VION central PNF

Supplier Evaluation process: P Food 10032 2024-04-19, last performed evaluation 2024-04-18.

Contracts are manged by Head office that clearly define service expectations. Food safety aspects are appropriately addressed.

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Examples assessed during this audit: Approval was based on risk to the safety and quality of products, compliance with legal requirements and potential risks to the security of the product. Ongoing monitoring was based among other things on complaints / service delivered. Service suppliers' performance was ongoing and was part of the management review.
3.5.4 Management of Outsourced processing
No outsourced processing and packing.

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3.6 Specifications

Suitable specifications are maintained for all raw materials (including primary packaging) and finished products and were reviewed from the auditor traceability exercise.
Specifications are managed by Head office in the central

Suitable specifications are maintained for all raw materials (including primary packaging) and finished products and were reviewed from the auditor traceability exercise.

Specifications are held electronically (MDM), and access is restricted to the compliance team.

Specifications include limits for relevant attributes (relevant chemical, microbiological, physical and allergens (no allergen containing products on site)). 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:

- Ar Hampunt
- Art Separatorvlees GFarming
- Art. Pork Bellies Rindless vacuum packed lot
- Packaging: Foil , delivered from Vion Site Scherpenzeel as this foil was not used there anymore.
- Cat 3 material
- Cleaning agent:
- and allergen free

All were seen to be clear and accurate.

Only B to B products is handled, frozen and packed. No customer branded products.
Verified customer approval during the vertical traceability exercise.

Frequency of review of specifications: at least every 3 years or if changes occur, all documented in

During the audit. several specifications were verified: The safety and legal requirements were documented verified for Art . Separator lees GFarming (=IKB) 11-03-2023) type 4 Ca > 1000 ppm. Clients specification mechanical separated frozen pork meat Type 4 Good Farming FP: frozen 2024-08-14.

Packaging food safety declaration (blue foil) issue date 2023-03-29 including migration declaration. All were seen to be clear and accurate.

Supplier Evaluation process: P Food 10032 2024-04-19
Performed evaluation 2024-04-18
Supplier approval 2023-11-29 P F00D 10026 is managed by VION central PNF
Verified for
packaging pk GFSI cert performance

contract managed by VION Central

No deviations were seen.

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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-NL-10088 2024-04-25**

Identified issues are logged in: the site central action list, RCA is included for all PRPs (CP's) and CCP's.

During this audit, several samples were taken to verify effectiveness of corrective and preventive actions. Root cause analysis is performed by the HACCP team in case of trends or significant non-conformities effectiveness of root cause analysis was by checking reoccurrence. Action list was discussed in meetings of the BT and HACCP team.
Usually the team discusses the RCA, no specific method in use, to determine appropriate preventive actions.

This approach is applied for: internal audits findings (in case not directly to correct), nonconformities raised by external audit bodies, complaints and found to be suitable and effective. It meets the expectations of the BRCGS standard (i.e., section 3.7)

Timescales for completion are agreed upon and recorded. No issues noted regarding exceedance of due dates.

Actions and status of CAPA list are discussed during: BT team, during weekly meetings or HACCP meetings.

The following evidence was reviewed:
Corrective actions as result of IA, see also 3.4 Internal Audits.

3.8 Control of non-conforming product

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Control of non-conforming product is detailed in: **PBSD-6000 02022-01-07**

There are categories for customer complaints, internal NCs and incidents, non-conforming materials and suppliers used.

Raw materials and (semi)finished products are checked regularly during the process stages.

Corrective and preventive actions are described in several work instructions (see previous section). In general, a clear process was implemented which is well understood by staff that was interviewed during the audit. However, during check of reception of fresh meat, temperature of some dolavs was 8,3°C, too high target is max. 7°C. The 3 dolavs with pork meat pieces, were stored separate in the cooling storage cell 2, but were not handled as described in the blocking procedure. The dolavs were not demonstrably marked as Blocked (they were set aside and blocked in the system, in a way that employees did know that these pallets were blocked, however, it was not demonstrably marked this way. ***Minor NC on 3.8.1***

There is a segregated section in the warehouse for non-conforming products and returned goods.

Responsibilities regarding release of products on hold lies with QA and follows a clear decision-making process.

Records are kept of decisions made and where product is destroyed for food safety reasons.

The following evidence was reviewed:
Maintenance record system
Internal Audit actions listed
Complaint records
Example seen of non-conforming product incident: **Trimmings art , temp was 8.2C , meat received from Vion site Apeldoorn 13-08-2024**
Temperature of reception was recorded in digital system, pallets were set aside but not demonstrably blocked, see Minor NC 3.8.1.

3.9 Traceability

The traceability process is documented in: **PBSD 4000 2024-05-27 canalisation en traceerbaarheid Vion Procedure on tracetests P-NL-Food 10070 22 nov 2023**

Traceability through the process:
Traceability system operates through the ERP computer system and paperwork enables trace of raw materials and packaging from supplier through processes to packing and dispatch. Incoming goods are entered into the ERP system and labelled. Basically, full pallets are transported from the Vion sites towards this cold store to be packed and frozen and in general they do not return. Replacements recorded based on scanning. In case of distributing recipients from the pallets to the production facility this will be entered manually into the system. Recording of batch information raw materials, packaging materials.

Traceability marking on products:
SSCC labels are printed on all products and packing at reception and after packing. The SSCC code is generated by the ERP system, this way all required data can be generated and is traceable.

Traceability test details company:
Frequency: min 1x year
Last test conducted**:** 2024-05-21 BLK plate freezing schoulders 3D / 2024-01-29 received and top down 2023-11-08 Product schijfjes van Encebe to be delivered to a client #

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Results are retained as documented information and reports include all relevant information and data (including mass balance information). Traceability is achieved within 4 hours.

Packing material is delivered by other Vion sites (to entry check was performed at other sites). Material is used FIFO, based on delivery and supplied coded. The traceability procedure was not fully complete as the way how packing material could be traced internal at this site was not fully clear described. ***Minor NC on 3.9.1***

Vertical audit details:
Finished product: art. Separatorvlees GFarming (=IKB) Spec. 2023-03-11, type 4 Ca > 1000 ppm. Clients specification: mechanical separated frozen pork meat Type 4 Good Farming FP: frozen 2024-07-14. UBD 2026-07-14 (2 years frozen storage) # , Quantities were in accordance with the production order. Mass balance was compliant, product on stock in coldstore, losses were minimal, compliant by plate freezing is a normal performance, ok packaging food safety declaration (blue foil) issue date 2023-03-29 including migration declaration, delivered by packaging GFSI cert, supplier performance ok. All were seen to be clear and accurate.

Key documentation reviewed including process control and quality control documentation: Temp control during reception, freezing and storage.
With a vertical audit list, (the internal LRQA list based on Raw materials/Production/Distribution/Quality Assessments/Finished Product Weight Control/HACCP – OPRP temperature of bulk packed products/Other Food Safety Controls/Microbiological Controls/Product Specification/ Cleaning on Sunday of the plate freezer installation. Management Systems/ Maintenance/Calibration/Training records) during the audit was tested. Mirco: results were complaint incl. Ca %.

Summary traceability and vertical audit:
Tracing (forwards/backwards) was possible within 4 H in the records/system. Rework is not used. Mass balance was compliant No product in stock, all sold. Seen product specification of the raw material and finished product, receipt records, food compliance certificate is verified. Fully traceable one-step-up and one-step-down the system, including packaging. 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. However, the company's traceability system is found to be not completely effective as they did not test the traceability of the packing material during last test trace as this was not included in the procedure. It is included in he general Vion procedure but unfortunately this documented procedure was not implemented jet on this site: ***Minor NC on 3.9.2***

Traceability tests are performed annually bottom up and top down. However, during these trace tests, the tracing of packing materials was not performed (as this was not included in the procedure). During the trace test initiated by the auditor, the traceability could be proofed. ***Minor NC on 3.9.3***

Validation was seen of 2-8-2024 Packing line

3.10 Complaint-handling

Complaint-handling is documented in: **maintained in general by HQ. in**

PBSD-4100 issue 09-02-2021 for complaint handling was also seer : recorded complaints. (dispatch number) connected to the complaint. Prod max 6 months old: not obeyed client request. Retrain employees, product is not returned. 2024-08-02

Follow-up of complaints is managed through: Complaints are handled centrally and on the location. Investigations are completed by the site and returned to the central function for responses. Corrective

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actions are carried out promptly and effectively. As there are only B to B products handled, main complaints are about KG. s/ administrative complaints, damaged packing and Fb's.

Product complaints:
FY 2023-2024: **166** complaints
Jul-2024 YTD: **5** complaints

Top 3 complaint reasons:
1. Loading issues (quality of loading)
2. Damaged sec. packing
3. Foreighn body (most of them aare about plastic pieces)

No complaints about temperature or other Food safety related issues.
A trend analysis is maintained and documented and discussed in management meetings quarterly documented and analysed in Q review. (including the management review).

There has been a significant decrease in number of complaints against previous year.

The following complaint samples were taken:
Complaint trends were included in last management review July 2024. Also, ongoing complaint handling during operational meetings for making improvements.

3.11 Management of incidents, product withdrawal and product recall

Incident management process documented in Vion P10015, v07.11.2023 and P10009, v12.09.2023. The recall procedure identifies those who are to be notified (including CB, LRQA) in the event of an incident where product safety or legality is in question. There is a recall plan which is supported by a recall checklist. Mobile phone numbers for the senior management team are available for out of hour's emergencies.
Recalls are categorised as critical (food safety, allergens, FBs, health, pest, and legislation) and non-critical (quality, coding and packaging). NVWA will be informed directly and LRQA will be informed within 3 working days according to procedure. Further via central HQ, quarterly reporting to LRQA seen.
Contingency plans have been considered, including the need to withdraw or recall products.

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 visit / The following incident occurred since the previous visit.

Date of last incident management procedures test: **04/07/2024**
Traceability test details company: Type of test completed: Product to be delivered for
was traced within 45 min, procedure PBSD 4200 2022-07-14
Type of test completed: recall/withdrawal/incident.
Frequency: min 1x year

Mass balance information is included in the report. Traceability is achieved within 45 min. Successful test conducted. No improvements have been required as result of the outcome.

Report of conducted test was seen, ok.
The company has procedures in place to report and effectively manage incidents and potential emergency situations that impact food safety, authenticity, legality, or quality.

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

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.1.3	No questionnaire was used for approval suppliers' raw materials. No questionnaire approval A&B.
3.5.4.1 till 3.5.4.6	No outsourced processing and packing.
3.9.4	No rework was allowed no rework seen during the site tour.

4. Site standards

4.1 External standards

Plant located in an industrial area in a rural environment.

Site boundaries are clearly identified. Premises is partly fenced off with security gate access to the facility, outside day shifts the main port is locked, then the site fully fenced. Maintenance of the exterior was outsourced.

Types of buildings include production facility, storage building, offices, and maintenance workshop.

Site security:
Unauthorised access is prevented by use authorised entry and guidance during in site visit. Visitors/contractors must register at the office building. Several cameras are installed. Staff must use staff entrance which was locked during the site tour and visitors must report their presence seen visitor registrations. No significant bird roosting seen during this site tour. Legal requirement for site registration sees 4.2.

Sufficient condition of constructions noted. No risks have been identified related to the external environment. Site area is properly maintained.

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, but this is included in the regular food safety/ HACCP training.

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Food defence risk assessment is documented and based on TACCP: **32024-01-03 RAvDistrifresh Coldstore Den Bosch actualised 2024-01-04**

Last check 2024-08-08, 1x year performed 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.

Examples of threats that have been determined **staff that is no longer working for the organisation, external chauffeurs** :
Reception of food, external entry/ gates batches.
Appropriate control measures are developed and implemented: **site is fully fenced with gates opened for trucks all checked and controlled by employees and cameras, batches are used for employees, locked doors. No outside storage.**

Site registration by the legal Dutch authorities NVWA was demonstrable. Company had registration number NL-EG543 Last official authority inspection Jan 2024 (see audits 3.5) was reviewed no official remarks. No external storage tanks, silos or intake pipes with external opening.

Access is via key coded doors for employees. 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 induction to site.

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

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 **List 9001A 2024-05-22**:

Production risk zones (based on BRCGS Annex 2):

- Open product areas: Low risk production zone identified due to processing of the meat to be frozen.
- Enclosed product areas: warehouses and storerooms
- Non-product areas: canteens, laundries, offices
- No High care and no High risk areas

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 no temporary constructions noticed during this audit. 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 following evidence was reviewed:
Sitemap Location Distrifresh LijstTD-900A v02 22-05-2024

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

Building materials were in basic condition. Smooth cement floors, in some situations some cracks in the floors and wall surfaces show some damages. But in the areas where naked meat is handled, the area is

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in basic condition and is cleanable. No issues were detected during the environmental motoring in open product areas. Walls, and ceilings from metal cladding.

Condition of building was acceptable. No deteriorated doors or gaps evident. No suspended ceilings and internal drains. However, the building is old, Maintenance and facility working hard together to keep the facility suitable for the processes running. As the building is hired from the formal owner, this seems not always to be easy what can and will be done (maintenance). Despite of all the efforts, a few nonconformities were raised against the environmental situation.

Condensation was manged, however, ccondensation was seen in the meat packing area (Underneath the protection of the belt) and in the reception area of fresh meat (on the ceiling/ pipework near the ceiling, near plate freezers) ***Minor NC on 4.4.10.***

No elevated walkways, access steps or mezzanine floors that are adjacent or above open product. Ventilation controls in place to ensure a basic air flow.

Protected glass, no windows could be opened in the processing areas.

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

There is a dedicated washing area present. The washing of crates is done separated from production. Plastic strip curtains present and in good condition.

The overhead protection of the climate installation in the packing area and near reception door 10 were showing rusty parts, start flaking off paint. ***Minor NC on 4.4.4***

In the forklift battery charging area, a ventilation opening in the wall / outside was not working, not fully clear was if this opening was adequately screened to prevent the ingress of pests / flying insects. ***Minor NC on 4.4.7***

4.5 Utilities – water, ice, air and other gases

Water is used only for: **cleaning**

Source(s) of water supply:
- Municipal/city (cleaning, handwashing)

Only potable water is used.

Microbiological or chemical testing is undertaken: 4 x year
Water testing is completed to ensure the requirements of The Private Water Supply Regulations 2016 are met. Analysis reports for chemistry are completed internally via compliance checks and microbiology via an accredited external laboratory.

A water system distribution schematic diagram is available, issue date 2021-10-14.
Sampling points include: in the water plan.

Gas used in packaging: **no**
Compressed air used: **no**
Purpose of compressed air use: activating machines only
In direct product contact: **no**

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Filtered at point of use (when in direct contact): **no product or primary packaging contact with compressed air.**

Checks are done on filter replacement as part of the preventive maintenance program, also to protect the machines against rust etc. However, compressed air is activating equipment only.

No air, steam or other gases are in contact with products.

4.6 Equipment

Key production and product-handling equipment include: **FTR checklist of Vion is used ,** maintenance recorded and monitored with help of Some sample taken, equipment was included and maintained. Most is maintained by own engineers.

Equipment is suitable and designed for the intended purpose, mostly stainless-steel construction. Conveyor belts are food grade. Hose used for product transfer is registered as FDA compliant for food contact.

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. Equipment is suitable and designed for the intended purpose, mostly stainless-steel construction. Seen in validation report relevant information on Impact (packing line) in use now, report d.d. 2024-04-06.

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

There is a procedure for moving static equipment detailing preventing potential risks to food safety and equipment integrity. Equipment that is not in use is always taken into the cleaning schedule when stays at the department.

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.

4.7 Maintenance

Preventative maintenance
Maintenance management system:
Notable equipment include: metal detection, plate freezer, robot line.

This clearance was recorded on the product quality record list **LIJSTD-160.** Preventative maintenance covers all plant, processing equipment and mobile equipment. Frequency of main checks is on daily basis; control rounds are performed. In the maintenance planning, 4 x year preventive maintenance of main equipment is planned (e.g. plate freezers and packing robots). Performed maintenance is documented. A maintenance pan was risk based set up. The building (environment) needs maintenance, but the building is hired and there are meetings ongoing to discuss what maintenance needs to be done an who is responsible for this maintenance. Communication is improving.

Samples seen and completed to schedule:

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- Maintenance list seen d.d 2024-04-15, sevral frequencies are included, daily inspections, 4x year maintenance, also a 6-weeks planning with inspections to be performed
- cooling installation 2024-02-19, including calibration / checks of the PT100 (checked x year)
- Plate freezer maintenance demonstrably performed 4x year: mechanic maintenace perfomed by own engineers, maintenace work with CO2 is outsourced Jul. 2024
- Maintenance top foil machine (hoezen machine) 2024-6-26
- Daily checks on cold store installations, if setpoits are reached, defrosting schedule is normal and temperatures are ok.

Inspection of equipment condition
Inspections for damage and wear are completed for: robot packer, cooling installations and ventilation equipment. Samples see above.

Temporary maintenance
Temporary repairs are controlled via photo in app of the engineers and contact by phone, Example was seen during the audit as the drain of the condense water of the cooling installation in one of the cooling cells was damaged. Product were replaced, and drain water was lead towards a sink. So the area was made free from raw material (prevent possible contamination risk). Next day it was fixed by maintenance, no water leakage anymore. Products could be stored again on their places.

Handover
Suitable handover processes were in place after maintenance work to eliminate foreign matter risks generated. Rule is that food contact material is always cleaned before use after maintenance activities. Other areas depending on the maintenance performed and an oral hand over towards production is performed.

Lubricants
Range of food grade lubricants used, DOC's and MSDS were on site available. Checked for lubricant

Overall cleanliness engineering workshop
The workshop area was basic maintained. However, the engineering shop is connected to the loading platform/ storage of packing material. No control measures were implemented to prevent transfer of engineering debris to this area. ***Minor Nc on 4.7.6***

4.8 Staff facilities

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

Workwear is laundered is outsourced. Captive site shoes are stored in the work-wear locker when not in use. Enough sets of working clothes are available for the employees.

Handwashing
Hands-free operable handwash facilities located in lobby area 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.

Toilets

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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
Two rest room areas for food storage and eating; no catering facility in place. There are vendors for food and drink (no nut products allowed or seen), a kettle and a microwave. There is a sink available for use also. Special areas for employees to store their own brought food. The checked smokers' facilities and waste handling were sufficient. No (white) working jackets are allowed to prevent contamination risks. Good controlled

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: Hazard analysis ref. PBSD-1200 and PBSD-1250 and contamination risks are handled in .

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. and

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: knives (Stanley and fish). No snap-off blades used.

An example was seen on the factory inspection and observed to be in a satisfactory condition.

Knife check performed by operation management, were documented on LIJST-700.02 and LIJST-701 andare included in the SSOP's to be used.

Condition and integrity are monitored: by QA/QC on monthly hygiene audits; see section 3.4.4 for details.

Staples, paper clips and drawing pins are not used in open production areas. Observed bags and boxes were glued or stitched.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Monitoring of glass/brittle, plastic and ceramic items is done through 2 x year.
Records were seen for: 2024-05-16, most recently performed glass inspection.

Besides 2x year checks, issues are documented on the daily lists of the sites.

Last round performed and recorded on record: 2024-05-16

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.

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Windows are protected against breakage with foil.

4.9.4 Products packed into glass or other brittle containers

Products are not packed into glass/brittle containers.

4.9.5 Wood

The use of wood had been eliminated as far as possible near open product areas.

No significant risks off the use of wood were seen during the site tour. Wooden pallets are allowed for packed raw material storage and packed end product.

Wooden pallets in and out were checked if they were fit for purpose. Wooden pallets used in storage areas were observed to be in good condition. .

4.9.6 Other physical contaminants

Describe any other specific controls on physical contamination such as packaging:
Observed freezing and packing of fresh meat staff was sufficiently aware to prevent physical contamination risks. To minimise the risk of physical contamination. blue unbreakable pens were used. In the hygiene rules non, approved items were included e.g., mobile phones, tablets etc.

Management of portable handheld equipment:
Metal detection is used for frozen products. Single piece biros are used with no small parts evident. The process is a largely enclosed tank and pipe system.

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 OPRP.

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, documented on the SSOP's.

No foreign bodies detected recently.

The following evidence was reviewed:
SSOP''s of the departments during the on-site audit and vert trace test.

4.10.2 Filters and sieves

No filters or sieves used.

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4.10.3 Metal detectors and X-ray equipment

Metal detection was used for frozen meat only:

2 metal detectors on site:

1. After plate freezing / before the robot stacks the frozen blocks on pallets. Example seen of metal detector of the carton boxes used test rods only check of frozen meat FE5,0, NFE 4,5 and SS 6,5mm, Checked at start, middle 2 times and end of packing.recorded on LIJSTD-0425.
2. After shock freezing of carton boxes with frozen meat.: Critical limits with marked test pieces were StS: 7,0 mm, N-Fe: 7,0 mm, Fe: 7,0 mm. Minimal test frequency was at start-up and at the end of the production period and two times in between checks recorded on LIJSTD-0425.

Metal detection equipment installed as result of the risk analysis and are not controlled as CCP, as only B tot B product is packed and transported.

Monitoring frequency: Checked at start, middle and end of packing.

Metal detection verification is performed through test sticks. The testing procedure is found to be suitable. No history of failed (metal) tests.

Corrective actions are clearly defined in the CCP control plan. Data is maintained in documentation. The sensibility of the detector is justified. An automatic belt stops with an alarm in place.

Metal detection was tested during this audit. Correct operation was observed in line with the work instruction.

In case of detection of foreign body contamination, the material is analysed by QA/QC
Date of last records seen of metal detection: **09/08/2024**

No x-ray was used.

Based on risk assessment ref. PBSD-1200 and PBSD-1250 issue 21-11-22 the company installed metal detector on request of some customers. The detection equipment was placed after plate freezer and before stacking. Sensitivity of removal method was appropriate. Procedures were in place in case of failure, including re-inspection of the products since last successful test. In case of detected foreign bodies these were investigated to find source and to prevent reoccurrence no significant incidents reported. Since a few months the metal detection is used for all products conform Vion policy.

4.10.4 Magnets

Magnets are not used.

4.10.5 Optical sorting equipment

Optical sorting equipment is not used.

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

No containers are in use. No products packed into glass/brittle containers.

4.10.7 Other foreign-body detection and removal equipment

Other types of control for foreign-body detection equipment not covered in section 4.10 are not required.

4.11 Housekeeping and hygiene

Cleaning is performed by.

Documented cleaning and disinfection procedures are in place and maintained for the building, plant and all equipment. Example seen of outsourced cleaning set up risk based: **2022-11-29 plan v92**

Cleaning methods described are found to be suitable. Plate freezer is cleaned every week on Sunday, the packing area 1 x day and other departments and areas once a week.

Cleaning agents' concentration is calibrated by themselves.

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 cleaning performance check after cleaning of March-August 2024 Good communication was seen by App, email and on the control forms. Dedicated contact person o , good contact and regular meetings, Checks on the effectiveness of the cleaning on daily basis, minimum visual checks. ATP swaps and Listeria Swaps are taken following the planning. Residue check 1 x 2 weeks performed and documented.

Cleaning records were reviewed in both the traceability exercise and on the factory inspection with no issues noted. Cleaning instructions verified D.Ed. 2024-05-16. Cleaning records detail the cleaning requirements stipulated in clause 4.11.2.

Examples records seen: records verified for Jan-Feb-March YTD 2024. Forms (like Pre-SSOP's to be) are verified by QA.

Microbiological and chemical parameters were investigated for cleaning following the sampling plan PROD_3131v03 Micriobiologisch onderzoek (ATP swaps and Listeria) see also 4.11.8. Trends were used for improvements. Overall hygiene status of the inspected walls, floors, ceiling and overheads was sufficient.

The level of cleaning methods described, and environmental monitoring performed is suitable against the final product risk.

However, in the cleaning procedure/ plan the weekly cleaning of the plate freezing installation was missing. Verification of the cleaning performance was seen and was found suitable. ***Minor Nc on 4.11.2***

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4.11.7 Cleaning in place (CIP)

CIP is not applicable.

4.11.8 Environmental monitoring

The environmental monitoring programme is detailed in: Procedure Microbiologisch onderzoek 3131 v3 2024-05-16

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: TPC and Listeria .

Comment on the results of environmental monitoring programme:
Sampled environmental check:

- Agar 2024-08-04 plate freezing and packing area 1 x 2 wk results are good,
- 2024-08-07, 2024-08-04, 2024-07-21 , 2024-07-07 and 2024-06-23 the tilter was re sampled. As the result of agar result of 2024-06-09 was not ok.
- 2024-03-08 and 2024-06-19 Listeria samples performed by , result absence

Results seen were within specification for past 6 months. In case out of spec, resampling takes place.

A clear review and trend analysis is in place. 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.

Environmental monitoring programs was based on risk and EG 2073 / Guide 85 verified Listeria swab results. Sampling locations were determined, and target organism were monthly swabs TPC, and residue pH checks recorded on LIJSTD-065.

Limits for acceptable results were recorded including corrective action in case control limit was not realised or in case of upward trends. Environmental monitoring program was reviewed continuously but at least annually during the management review.

4.12 Waste and waste disposal

Waste is categorized in: **Cat 2, caton, plastic and mixed waste.**
All waste containers were identified with contents.

The site was seen to be clean and tidy with waste well controlled and no evidence of spillages were observed. There are limited open product areas.

Waste removal is contracted to: .
Trademarked waste materials are: not present.

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Licensed waste removal was sampled for:
Records of destruction are being retained.

4.13 Management of surplus food and products for animal feed

No customer branded products produced; surplus materials were destructed.

4.14 Pest management

Pest control is contracted to
The scope is detailed as: rodents, flies and insect monitor of crawling insects.

No internal pest controller applicable.

No presence of infestation during the last certificated period or observed during the BRCGS audit. If yes, detail how it was identified and treated. If no, remove this sentence.

Routine visits per year: 6 x year
Content of routine inspection: **2024-08-07**
In-depth inspections performed: **2024-04-04**
Frequency is suitable.
Plan 2024-07-
Licence EVM

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

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 on site containing allergens.

Chemicals and (raw) materials are stored separately from finished products. Only electric powdered fork-lift trucks are operated.

Stocks of materials are kept on site and stock rotation is via ERP system (SSCC codes) identifying FIFO usage.

All products are scanned at reception, after packing and before dispatch, all identified by SSCC labels.

This was checked for during the on-site audit.

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.

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No outside storage. No controlled atmosphere storage.

Seen temperature of shock freezers YTD 2024-08-24 and 2024-08-13 Temp till around -40 C (max -48 C, Tampering cel Temp -9C, Freezing area -21,5C
Environment temperature at plate freezing area was 8.4 C, cooling cel 1 <4 C.
Cat 2 and 3 is stored at -7 C.

Temperature control is required for raw materials which are received and are stored in 4 cooling cells before plate freezing.

To remain the correct product temperature (as different kind of products are handled: (Temp max 3, max 4 or max 7 C), the storages connected to the production and reception areas) must be closed as much as possible as the “production area temperature was around 8-14°C. During the on-site audit, the doors were not closed during non-working hours. ***Minor NC on 4.15.3***

No other deviations, cooling equipment is working well at that moment the temperature outside was around 28 C.

4.16 Dispatch and transport

The transport of finished goods is all outsourced to external service providers. There are no company vehicles. Transport is arranged by Vion Head Office Boxtel.

An overview is maintained in the site approved supplier list.
Verified GFSI certification of: **Distrifresh Boxtel**

Temperature checks and hygiene monitoring controls are in place for:
unloading raw materials and loading finished product. This is daily using pre-use check sheets.
unloading Temp meat packed in boxes = CCP, unloading temp of fresh meat chilled packed in dolavs or crates is checked and controlled as an OPRP.

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

This was verified for reception of 2024-0813 art Pork Bellies vacuum packed in boxes (CCP) 3,1 and temperature of the products was checked for loading container for Philippines Temp -18,1 C order

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.5	No suspended ceilings in the production.

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4.5.3	No gases were used for direct product contact. No air was used for direct product contact.
4.9.4.1 till 4.9.4.3	No products were packed into glass or brittle containers.
4.10.2.1 and 4.10.2.2	No filters or sieves were used.
4.10.3.5	No X-ray was used.
4.10.4.1	No magnets were used.
4.10.5.1	No optical sorting equipment was used.
4.10.6.1 and 4.10.6.2	No inversion or rinsing equipment was necessary for these products.
4.10.7.1	No other removal foreign-body equipment
4.11.7.1 till 4.11.7.4	No CIP equipment was used for cleaning.
4.13.1 till 4.13.3	No customer branded products produced; surplus materials were destructed.
4.15.4	No specific atmospheric storage required.
4.15.5	Storage outside was not allowed

5. Product control

5.1 Product design/development

Developments mostly related to improvement operational (automated) processes, product quality/safety, packaging material and providing optimal (storage) condition. No specific trials were performed since previous audit.

Product development takes place in cooperation with the customers. Changes were followed by validation HACCP-study/ HACCP-review conducted by QA manager during the HACCP meetings. To identify any new threats or impact on the HACCP system, approval was done by the HACCP team. Validation and trial of new processes included in the ALGD-1250 “responsibilities validation team”.

Seen in validation report relevant information on Impact (packing line) in use now, report d.d. 2024-04-06.

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Since previous audit, no use of new packing materials or processes. No nutritional claims were made to satisfy a consumer group. Only frozen B to B products is handled.

Microbiological analysis for shelf-life testing was scheduled on ref. ALGD-1250 / Microbiological testing However these tests are not performed by the company as the product s are owned by Vion head office (see also Minor NC on 5.6.1)

5.2 Product labelling

The following documentation describes the process: **F-DDB-NL-10007 2024-05-16**

Legislation in countries of sale:
Labelling product for EU-market following EU-legislation and any additional customer requirement. No markets outside EU for this kind of products produced at this Vion site. In storage no none-labelled goods allowed.

Seen several right labelling of B2B packing.

Artwork approval & accuracy of information:
O specific artwork, only B to B labels.

No allergens on site used.

Cooking instruction validation procedures: No cooking instruction were provided on the packaging / labels, not applicable (B to B)

The following evidence was reviewed:
Label checked for Hampunt Frans # SSCC #. art (slaughter 2024-08-06, production date 2024-08-08) and art pd 2024-05-25 BB 2026-05-24 loaded in container for the Philippines.

5.3 Management of allergens

The following documents form the controls in this area: Risk assessment of raw materials formed the basis for the allergens assessment ref. PROD- 3160 PBSD 1200 / 1250. Allergens none were identified in production

Allergens handled on site are: none.

The risk assessment covers all potential sources, including cross contamination. Measures implemented include: in hygiene rules on site for employees.

Allergen containing re-work: NA.

Claims for individuals:
No allergen claims are made.

Cleaning, validation and verification:
No cross-contamination warning on labels necessary. No rework was allowed no rework seen during the site tour. Products were not designed for specific vulnerable target group allergy sufferers. No allergens used in production no cross contamination or equipment area cleaning applicable. Interviewed staff were

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well aware of their responsibilities concerning allergen contamination caused by home brought food. No cross-contamination warning on labels necessary, no rework.

Changeover process:
No change over was assessed, but only fresh raw pork meat was handled during the audit days.

5.4 Product authenticity, claims and chain of custody

Product authenticity (data and product integrity) is detailed in: PBSD_1290 last updated 2024-01-12 and P-DDB-NL-10003 on 2024-01-04

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

The company is EKS certified.

The vulnerability assessment covers all the mandatory requirements in section 5.4 of the BRCGS standard.

Examples raw materials, risk level and mitigating controls:
No significant vulnerabilities have been determined.
No mitigation measures were needed to be developed and implemented.

Review of the vulnerability plan is programmed to be completed annually.
Date of the last review: 04/01/2024

Claims:
All claims provided/ connected to the products delivered to the site are kept as labelled (included in the information behind SSCC label. All claims provided with the products by the Vion chain, are copied on the labels, only Vion products with Vion labels.
Claims such as IKB, `, QS, FS (Good Farming Star), FS+(BLK 1 star for retainer #), FSA (#. Beter for, 100% pork, NL/DE are included incl. country of origin.

As in 2023 the EKS approval by NVWA was rejected because of some issues during preparations of dispatch, the employees were intensive trained and monitored to get this certification back again. This way several training sessions were initiated to level up the knowledge of the employees.
Finally in January, the EKS approval was given back again to the site by the Dutch NVWA.

Training:
Past year for the involved expedition employees (reception and dispatch) several training sessions were initiated: on reception, registration, integrity, whistle-blower procedure and traceability (2023-11-01), and training organised by Vion Head office on IFS PIA and integrity 2023-12-20. Also training sessions on EKS were organised on 2024-01-13/15, 2023-11-06/16.
Mass balances on integrity are tested very frequently, results past months were all compliant (100%). EKS approval was valid again from Jan 2024. Integrity complaints KPI was set on max 8/ quarter. Result for past 12 months was in total 6 complaints.

5.5 Product packaging

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The packaging materials for finished products are: **plastic foil**

Suitable packing procedures and materials are in place with relevant (food contact suitability/migration) specifications. For packing material, Approval of suppliers based on GFSI-certification. All suppliers of packaging materials have to be approved by the central Vion head office entered into the system ( ) before they are allowed to deliver. Specification and declarations of conformity seen for the packaging used in the traceability test.

The following evidence was reviewed:
Verified was the food safety declaration (blue foil) issue date 2023-03-29 including migration declaration. In case of particular characteristics, the suppliers will be made aware of these requirements. During the site inspection the storage facilities for packaging were inspected. Materials were packed appropriate instruction were verified by interviewing employees. Obsolete packaging and labels were visually recognizable. The contact liners used were blue: standard product, orange: Beter Leven Keurmerk (BLK) and green: organic and an example taken had sufficient strength.

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

The testing programme is outlined in: **Procedure Microbiologisch onderzoek 3131 v3 2024-05-16**
No product testing applicable as this was performed by Vion Head quarter, results were seen. However, there was no validation present on this decision that there is no need to investigate the micro status of products after freezing on this site. ***Minor NC on 5.6.1***

Sampled environmental check:

- Agar 2024-08-04 plate freezing and packing area 1 x 2 wk results are good,
- 2024-08-07, 2024-08-04, 2024-07-21 , 2024-07-07 and 2024-06-23 the tilter was re sampled. As the result of agar result of 2024-06-09 was not ok.
- 2024-03-08 and 2024-06-19 Listeria samples performed b result absence

A plan of analysis is available and systematically followed. Product samples are taken from freezing and packing areas. Agar 1 x 2 weeks, Listeria 4 x year. Water 2x year.

Types of tests and frequency:
Onsite laboratories
No laboratory on site verified external labs were accredited under number and . No testing in production. Corrective action in case control limit was not realised or in case of upward trends was explained by QA, legal requirements (EG 2073 and Guide 85) must be met.

Reliability of critical testing:
The accuracy of test results is verified through accredited elaborate.

5.7 Product release

In the examples investigated during the audit, release and positive release did not occur before every requirement was investigated by authorised person and were in line with the Quality- and HACCP-plans.

5.8 Pet food and animal feed

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No pet food produced.
5.9 Animal primary conversion
No animal primary conversion.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.1.1	No nutritional claims were made to satisfy a consumer group.
5.2.4	No cooking instruction were provided on the packaging / labels.
5.3.5	No rework was allowed no rework seen during the site tour.
5.3.6	No cross-contamination warning on labels necessary.
5.3.7	Products were not designed for specific vulnerable target group allergy sufferers.
5.3.8	No allergens used in production no cross contamination or equipment area cleaning applicable.
5.6.5	No testing activities in production / storage areas.
5.6.7	No laboratory on site.
5.8	No pet food products produced.
5.9.2 till 5.9.4	No receipt of live animals.

6. Process control
6.1 Control of operations
Process control was evaluated in all process steps incl. packing, no change over could be assessed. **The following evidence was reviewed:**

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During the onsite audit evaluated:
- Unloading and reception of fresh chilled meat packed in carton boxes, crates, dolavs', incl. CCP temperature check / OPRP temp, checking labels and scanning e products into the ERP system
- storage of meat, chilled
- plate freezing of meat
- metal detection and stacking on pallets
- packing pallets with foil and labelling
- packing of fresh meat into boxes within liners
- Vacuum packing of meat, labelling
- Shock freezing op products packed in boxes, labelling
- stacking boxes on pallets
- Wrapping pallets and storage in old store
- tampering of eat in special temperature cell
- Storage of chilled meat (packed in crates, foil, boxes)
- Collecting pallets for dispatch
- temperature check of meat, container/ temperature of container
- Label check with specifications and client requests
- weight control checks
- PRE-ssop and SSOP checks
- Maintenance checked
- Control checks before loading on product temperature (CCP) and trucks order ok
- Chemical storage (for cleaning purposes)
- Cleaning performance

Documented procedures and work instructions are in place that 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, additions, recipes, quality testing and results, set up approval (release) and packing.

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

No products outside of the scope are handled.

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.

Records of checks were sampled from during the on-site audit: as products are received: the information stays with the product as the SSCC label is scanned,

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 labelling supervisor.
There is no online verification equipment for the correct label.

Only B to B labels.
No unlabelled products seen during the onsite audit.

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6.3 Quantity, weight, volume and number control

Weight control: the legislation for weight control in country for sale is checked and the client is requested if any specific requirements are applicable. This was checked during the vertical trace test and also checked for the loaded container for Philippines.

No online check weighers were used.

No bulk quantities are sold.

No online check weighers.

6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated on calibration form ALGD-1500 v3.
There is a monitoring and registration system for the temperature in cooling / freezing cells and production areas. Calibration of the temperature equipment is outsourced.
Temperature devices (hand thermometers CCP and CP related) and scales (legal issue) were sampled and found calibrated min 1x year. Calibration of the chemical dosing systems used for cleaning equipment is managed by the cleaning company

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

- Metal detector robot 31002460067 2024-06-17
- Temp.meter CCP 2024-07-22
- Calibration weighing unit 2024-0-08 Scale service

Clear records of calibration were seen within defined limits for all the equipment sampled following the schedule.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
6.2.4	No on-line vision equipment used to check product labels and printing.
6.3.3	No online check weighers were used.

7. Personnel

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

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Induction training is required for all new employees and includes the company hygiene rules, site policy, general product safety and quality aspects, etc.

There is a 2 yearly refresher training session for inductions in place.

Training needs for personnel engaged in activities related to product safety, quality and legality are further defined in an overview. Procedure 3/5 V08 2027-07-04.
Employee training is defined in a documented procedure. For operators there are records of sign off against key tasks at start of working for the company. P-DFS-NL-10062 – 31-7-2023 supported by the PowerPoint. Hyg. Rules Visitors 3010 v16 2024-05-16

At this visit, operators were sampled. Clear competency records and refresher training records were seen.

The following evidence was reviewed:

Agency bureau providing the first training session,
Training was verified for:
- 2024-07-05 Hyg. Instructions and 2022-01-0 Procedure 3010 v14, Working at Vion 2023-07-31. F-DSF – NL 10056, Forklift certificate incl. ID and P-DFS-NL-10062 – 31-7-2023 supported by the PowerPoint.
- (prod. Employee) CCP temp trained 2024-08-08 HACCP Fpood Fraud en food defense 2023-01-13
- (Team leader) 2024-08-02 CCP temp trained, HACCP training 2023-01-13
- 2024-08-02 HACCP training incl FF en FD

Personnel signed for attendance. Training needs were evaluated in the management review also in case specific deviation were found during the year related to training needs (good example was the training sessions o integrity (EKS) . Annual frequency was strived for refresh.

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 must fill out a complete questionnaire.

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. Double sided lockers for personal and company issued clothing. Staff changes into workwear on site. Toilets are accessible from the locker rooms, segregated from production. Designated smoking area available outside of the main buildings.

Plasters were blue coloured verified metal detection recorded on LIJST-2250 version 2023-11-01 and ` checked in March 2023 ok

The following evidence was reviewed:

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In practice seen every day on site during the audit, good control

7.3 Medical screening

Staff medical screening is limited under national privacy law. Reporting of illness 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 log and therewith declare adherence to the company rules.

Employees, visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Procedures are established for personnel to notify management of infectious conditions they may be suffering from or been in contact with.
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. The health and safety service physician signs declarations for each personnel under contract of VION. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities. General health declaration is checked and signed by Company doctor (voluntarily)
Personnel should report the use of medicine to their direct leader according to the house rules in the contract. Dutch law ensures basic income in case of absence due to illness.

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 used in production processes. Disposable white coats and hair/beard nets available for visitors.

Laundering of clothing is done by external service provide (professional laundry service). was audited by a third party every year seen certificate ISO 22000 valid till 07-12-2025 including declaration "hygiene and washing temperature" based on EN 14065. Clothing was suitable protected against contaminations and commercial sterile. Protective clothing was changed minimal every day.

Segregation of clean and dirty clothing is effectively managed; there is a dedicated closed bin for dirty clothing. Clean clothing is provided in a dedicated locker by the laundry service provider.

However, in the areas where "naked "product" is handled, the employees wearing white company clothes, which is required. During the onsite audit, employees were seen in other areas " still wearing white clothes", as they did not follow the correct routing towards changing rooms. ***Minor NC on 4.3.4***

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

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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

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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.	

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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)

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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.

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