

Audit Report

| 1. Audit Summary | | | |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------|
| Company name | VION Apeldoorn BV | Site Code | 1812048 |
| Site name | VION Apeldoorn BV | | |
| Scope of audit | The slaughtering of pigs and the deboning, cutting to specification and packing in bulk packaging of pork, including Good Farming-meat. The production and packing of slaughter by-products including frozen pancreas and salted intestines. | | |
| Exclusions from scope | Exclusion from scope Traded goods. | | |
| Justification for exclusion | No trading on this location. | | |
| Audit Start Date | 2021-02-01 | Audit Finish Date | 2021-02-03 |
| Re-audit due date | 2022-02-04 | Head Office | Yes |

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

| 2. Audit Results | | | | | |
|----------------------------|--------------|-------------------------|-------------|------------|-----------|
| Audit result | Certificated | Audit grade | AA | Audit type | Announced |
| Previous audit grade | AA | Previous audit date | 2020-01-21 | | |
| Certificate issue date | 2021-03-09 | Certificate expiry date | 2022-03-18 | | |
| Number of non-conformities | | | Fundamental | 0 | |
| | | | Critical | 0 | |
| | | | Major | 0 | |

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2. Audit Results

| | | |
|--|-------|---|
| | Minor | 4 |
|--|-------|---|

3. Company Details

| | | | |
|--------------------------------------|------------------------------------------------|-----------------------------|--|
| Address | Laan van Malkenschoten 77 7302 HD Apeldoorn | | |
| Country | Netherlands | Site Telephone Number | |
| Commercial representative Name | | Email | |
| Technical representative Name | | Email | |

4. Company Profile

| | | | | | |
|-----------------------------------------|--------------------------------------------------------------------------------|---------------------|--------|-----------------------|-----|
| Plant size (metres square) | 10-25K sq.m | No. of employees | 51-500 | No. of HACCP plans | 1-3 |
| Shift Pattern | 1 Shift | | | | |
| Subcontracted processes | No | | | | |
| Other certificates held | ISO9001, IFS-PIA CBL, SKAL-Organic | | | | |
| Regions exported to | Asia North America South America Europe Oceania Choose a region | | | | |
| Company registration number | NL-312-EG | | | | |
| Major changes since last BRCGS audit | No Major changes | | | | |

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4. Company Profile

Vion Apeldoorn BV is a slaughterhouse and industrial butcher for pork meat. The company is part of the Vion Food Group (Vion Food Nederland). The company is slaughtering in general 25.000 pigs / week (570 pigs / hour) at one line. The slaughtering and cutting departments work in 1 shift system; 485 employees of which appr. 350 agency workers, area 10663-meter square and 1 HACCP plan. This management and maintenance team has led big alterations of past years.

The slaughtered pigs are all Dutch origin (born and bred). These are cut to specification for several customers. A vast amount of the pigs is slaughtered and cut to specification for an outsourcing party (another Dutch meat producer).

Livestock status from the slaughtered pigs is now on entrance and canalised as agreed with customer. (GF/IKB, QS/IKB, MS/FS (BLK) and organic). Purchasing- and transport process from livestock is organised by Vion Farming (HQ Boxtel).

Vion Apeldoorn is producing bulk products (in bone, boneless, hanging products, and packed products) and since last year also intestines and derived products of it for the European and Asian market.

The middles are mainly selected for the bacon production at Vion Scherpenzeel. The cutting department is cutting hams and shoulders to customer specification. No consumer products are made.

Sales, transport and purchase processes are centrally organised by the HQ in Boxtel within Vion.

Also freezing can be used which is also organised by HQ.

Vion Apeldoorn is USDA approved and is allowed to export to Russia, Oceania, Japan, USA and China.

EG registration is EG-312-NL.

www.vionfoodgroup.com

5. Product Characteristics

Product categories

01 - Raw red meat

Category

Category

Category

Finished product safety rationale

Fresh pork meat (bulk, carcasses and cut to specification: further processing required), chilled (max. 7 °C), short shelf life, no presence of preservatives, packed at semi bulk level or vacuum. Organs (max. 3 °C) and intestines (in brine / max. 10°C) chilled.

High care

No

High risk

No

Ambient high care

No

Justification for area

In line with appendix 2 of BRC (Production of fresh pork meat which undergo a full cooking prior to consumption. Intestines for food and pharmaceutical purpose (human and cat3) are processed in further stages).

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5. Product Characteristics

| | |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Allergens handled on site | Sulphur dioxide and Sulphites Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen |
| Product claims made e.g. IP, organic | Organic, BLK |
| Product recalls in last 12 Months | No |
| Products in production at the time of the audit | Pigs slaughtering relnr: 2. In line packaging of products: organs (diaphragm, livers etc.). Production of intestines. |

6. Audit Duration Details

| | | | |
|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|--------------|
| On-site duration | 20 man hours | Duration of production facility inspection | 10 man hours |
| Reasons for deviation from typical or expected audit duration | For this audit; Calculated was 24 hours but reduced to 20 because of mature QA system and good results in the past. floor size is just above 10.000 sqM). The intestines department is included (appr 22 employees) resulting in total 485 people. | | |
| Next audit type selected | Announced | | |

Audit Duration per day

| Audit Day | Date | Start Time | Finish time |
|-----------|------------|------------|-------------|
| 1 | 2021-02-01 | 08:00 | 16:00 |
| 2 | 2021-02-02 | 07:00 | 15:00 |
| 3 | 2021-02-03 | 07:00 | 11:00 |

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| | Auditor number | Name | Role |
|-----------------------|----------------|------|---------------|
| Auditor Number | | | Lead Auditor |
| Second Auditor Number | N/A | | Please select |

| Present at audit | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------|------------------|-----------------|
| Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11) | | | | |
| Name/Job Title | Opening Meeting | Site Inspection | Procedure Review | Closing Meeting |
| Plant Manager | X | | X | X |
| QA manager | X | X | X | X |
| Production Manager | X | | | X |
| HR manager | | | X | |
| Maintenance Manager | X | X | X | X |
| Assistant manager QA | | | X | |
| Cutting department and logistic manager | X | | | X |
| Slaughterhal manager | X | X | | X |
| Controller | X | | | |
| Foreman Facility department | | X | | |
| Foreman Dispatch | | X | | |
| Forewoman Azië | | X | X | |
| Foreman Slaughtering | | X | | |
| Slaughtering | | X | | |
| Assistant TD | | X | X | |
| Foreman Cutting department | | X | | |

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| GFSI Audit History | | |
|--------------------|-----------------|-----------------------|
| Date | Scheme/Standard | Announced/Unannounced |
| 2020-02-15 | BRCGS Food 8 | Announced |



Non-Conformity Summary Sheet

| Critical or Major Non Conformities Against Fundamental Requirements | | | | |
|---------------------------------------------------------------------|--------|--------|-------------------|--------------------|
| No | Clause | Detail | Critical or Major | Ant. re-audit date |
| | | | | |

| Critical | | | | |
|----------|--------|--------|--|--------------------|
| No. | Clause | Detail | | Ant. Re-audit date |
| | | | | |

| Major | | | | | | |
|-------|--------|--------|------------|---------------------------------|---------------------|---------------|
| No | Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed |
| | | | | | | |
| | | | | | | |
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| Minor | | | | | | |
|-------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|---------------|
| No | Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed |
| 1 | 2.2.1 | The Prerequisite program is assessed during the tour of the location. Seen during the tour that the control measures and monitoring procedures were not fully followed. Several tools were not tidied up in the corresponding place such as a transport hook, hook attendants and a broom. | Remove tools and placed back to the corresponding place. Re-instruction to staff. | Inventory of hook attendants needed in cooling stores and create usual spots to tidied up. To control the tools we will make in our 5S system (VOS) of 2021 the 'tools' as a new target of all production departments. See attachment. | We didn't have an eye for the tools the employees are using in de cooling stores and store in storage cabinets. | 2021-02-26 |
| 2 | 3.4.1 | During the document review of the internal audits asked about the risk assessment for the frequency of the number of internal audits. Given the reason for the frequency, but this is also based on ratings from the past audits (internal and external) and based on these results, the current frequency of 4 internal audits has been chosen. | The frequency of the internal audits in Vion Apeldoorn is not increased, because we had no food safety issues of our KPI and all audits were satisfied. | The risk assessment of the frequency of internal audits is described in procedure P-VION-10.011 Internal audits (v6). The judgment of the frequency of the internal audits is still enough will be done in the management review of the location. In case of increasing the frequency of internal audits this will | The risk assessment of the frequency of internal audits and the judgment was not established in the central procedures. | 2021-02-26 |

| | | |
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| Minor | | | | | | |
|-------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|------------|
| | | Only the reason when the frequency changes (increase or decrease) is not specified. | | be planned in Q3 by the audit coordinator. See attachment. | | |
| 3 | 3.5.3.2 | During the tour in the warm department, assess the activities that a supplier of service performs for the organization. This supplier of service performs classification measurement for the pork, for which he uses tools. During the observation it appeared that he did not replace one of these aids correctly after use in accordance with the agreements laid down in a contract that the organization has with this supplier of service. | The supervisor of the supplier of service classifications of the pigs has given Vion Apeldoorn the feedback the employee take his job seriously and the hygiene of the material he was using for verification was not according their own procedures. | Vion Apeldoorn will make a hook at the work position to store the material after use. The supervisor has re-instructed the employee to disinfect the material each time after use. Verification of the correct work method is done by the supervisor supplier service and QA of Vion Apeldoorn at 23-02-2021. See attachment. | The employee of the supplier of service classifications of the pigs was not aware of the unhygienic situation he was working. | 2021-02-26 |
| 4 | 4.9.1.1 | Assess the working stock of lubricants during the tour of the maintenance department. This is only accessible to authorized employees and equipped with a lock with a key plan. Also assessed the stock of lubricants, these are stored | We separated the tox and non-tox agents directly. | The separation of the lubrications in the storage of the working stock is renewed. All lubricants are identified. Non-tox agents are separated stored of | The aware of the chemical contamination was not clear. | 2021-02-26 |

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| Minor | | | | | | |
|-------|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|---------------------------------------------------------------------------------------------------------------------------------|--|
| | | and locked away outside the workshop, there were clear labels and there is an excellent separation of non-food and food grade products. In the storage of working stock lubricants (small amount), as a number of pots were not provided with the correct label, the separation of food grade and non-food grade agents was also not optimal. | | | the tox agents on a fixed visualized place. See attachment. In teamhuddel of maintenance the adjustment is explained. | |

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

Additional Modules / Head Office Non-Conformity Summary Sheet

| | | |
|-------------------------------------------|---------------|--------------------------------|
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| Major | | | | | | | |
|-------|--------|--------|------------|---------------------------------|---------------------|---------------|-------------|
| No | Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Date reviewed | Reviewed by |
| | | | | | | | |
| | | | | | | | |



| Minor | | | | | | |
|-------|--------|--------|------------|---------------------------------|---------------------|-------------|
| No | Clause | Detail | Correction | Proposed preventive action plan | Root cause analysis | Reviewed by |
| | | | | | | |
| | | | | | | |

| | | |
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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

In the quarterly Management review (verified last MR Q4 2020) This gives a good picture of the targets, objectives and planned improvement efforts for 2021.

There is a documented Food safety, Food Defence and Food Fraud policy which is confirmed by the senior management P-APD-NL-10.001 version 15 signed by ~~~~~ in 2020-01-03.

Clear targets, but due to the Covid-19 pandemic, a few targets have been delayed or adjusted in the course of 2020.

Clear targets are set for production (optimizing organisation and food safety) and growth. These are discussed in the management review and are applicable for the coming year. Results or significant trends that confirm how well the company was doing against the targets of last year are outlined in the MR seen Q2 and Q4.

The company has introduced and implemented a plan for the development and continuing improvement of a food safety & quality culture. During the audit the implementation of this plan was also verified on the factory floor. Clear individual and group values, attitudes competencies and patterns of behaviour were visible.

Culture is a significant part of the management review, not only on Food Safety, but also on attitude, work ethics and how do you interact as a person

Frequency and typical attendance at the management review meetings is every quarter. And at least annually management review is set up. Verified quarterly MR meetings last one 2021-01-26. In these meetings the follow up of the objectives/targets is followed.

There is a system used to allow reporting of concerns by staff (whistle blowing procedure) so that confidentiality is managed by central HR. At the moment there are no concerns of staff reported. Also, a structure of the communication/meeting program relating to food safety and quality issues (HACCP meeting) is applicable.

Communication is linked to the VOS system: 5x/day team huddles, daily Tier1 meetings, weekly Tier2 meetings (trends, MT level), monthly Tier3 meetings (including monitoring progress realisation objectives).

The management review is kept at a quarterly base. The HACCP verification is integrated in the yearly management review report (seen last year report July 2019 – June 2020).

Site has a list of all relevant legislation (NL-312-EG). No issues were observed during the audit that could be considered as non-compliant with legislative/regulatory requirements. To keep up to date with legislative changes, codes of practice and emerging issues is kept up to date through the QA department at HQ.

The Senior Management provides enough resources for implementation and development of the FSMS. The site has a genuine, electronic version of the current Standard available and gets the newsletters from BRC Global Standards.

Due date BRC audit is 04.02.2021; so, the BRC audit is scheduled on time.

The plant manager attended the opening and closing meeting and was available during the audit.

Outstanding points from the previous BRC audit (1 Minor) discussed and no reoccurrence was seen.



1.2 Organisational structure, responsibilities and management authority

The senior management has appointed qualified employees for key functions. Responsibilities and competences are laid down in job descriptions. Employees in key functions and the members of the Incident Management Team are announced in the production site. Also, Members of the Food Safety Team are also announced. The organisational structure has been reviewed 2020-12-03.

In the chart all levels are defined for the departments. Site management team includes. The QA department responsible for food safety, legality and quality items is reporting within the management team meetings. Clear responsibilities/competences have been documented (including arrangements in case of absence of the responsible staff. All staff are aware of their responsibilities and have access to relevant procedures.

Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|---------------|
| | |

2 The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles. The HACCP system is implemented and maintained. At VION Food NL corporate level a thorough HACCP analysis (P-VION-10.000) is made and available for the sites.

The local process control plan (P-APD-NL-10.022), authorised by the plant manager) was developed by the multi-disciplinary HACCP team. The HACCP system has full management commitment and is an integral part of the company's Quality Management System (QMS). The HACCP system is well documented and effective. Prerequisite program with 53 CP's assessed including the ones from the intestines department (some 9), described in P-APD-NL-10.023. Full product description including microbiological limits and shelf life is in place.

Daily check at CP's is integrated in the SSOP and pre-SSOP checks. Monthly verification by the QA manager.

The local MT is also the HACCP team; the food safety team leader is demonstrable qualified for this role (bachelor level food technology and experienced).

The organization has drawn all process steps and has identified the hazards and associated risks against the steps. Once all the hazards for each process step have been identified, they are analysed taking into account the severity of the hazard and also the likelihood of the hazard affecting finished product. Actual examples of hazards assessed are:

CCP 1 Faecal contamination of carcasses; (check absence every hour 25 carcasses, zero tolerance for macroscopic visible faecal contamination (hourly, in line measurements))

CCP 2: Temperature of animal by-products (organs) at dispatch (≤ 3.0 °C);

CCP 3: Temperature of fresh pork meat at dispatch (≤ 7.0 °C)

CCP 4. Temperature of partially chilled pork meat for max 6h transport at dispatch (surface ≤ 7.0 °C);

CCP 5: Temperature of (returned) animal by-products (organs) at reception (≤ 3.0 °C);

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CCP 6: Temperature of (returned) fresh pork meat at reception ($\leq 7.0^{\circ}\text{C}$);
 CCP 7: Temperature of partially chilled pork meat for max 30h transport at dispatch (core $\leq 15.0^{\circ}\text{C}$ or surface $\leq 7.0^{\circ}\text{C}$);
 CCP 8: Temperature of animal by-products (salted testiness) at dispatch ($\leq 10.0^{\circ}\text{C}$);

The severity and likelihood is classified as either high, medium or low. To ensure that the classification is consistent, high, medium and low for both severity and likelihood have been defined. It is clearly described how to choose to CP/OPRP or CCP.

The intended use of the product by the customer has been clearly defined. Vion Apeldoorn is producing B-to-B products. No ready-to-eat or consumer products.

Flow diagrams are documented and actual (2021-01-26). Flow diagrams Vion Apeldoorn including intestine processing. This is verified for the several departments, no remarks.

The HACCP plan included a review of potential physical, chemical and microbiological hazards. Each identified hazard was reviewed and given a risk rating to define the severity (1 – 3) and likeliness (1 – 3) of a hazard occurring. The risks ($R \geq 3$) have been defined from the hazards with adoption of a decision tree: Risk < 3 = PRP, Risk 3 or 4 = CP, Risk 6 or 9 = CCP.

Actions when monitoring level goes beyond acceptable limits are also mentioned within the HACCP plan. The CCPs which have been determined, including critical limits and are related to the legal temperature requirements for meat and corporate engagements. Clear description of the key elements of the CCP's, OPRP's and PRPs.

Validation of each CCP has been performed. Each CCP has been demonstrated, including a right way of recording during the audit, including corrective actions (action to last correct check).

Procedures of verification have been established to confirm that the HACCP or food safety plan, including controls managed by prerequisite programs are still effective. 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 are verified. Results of verification are recorded and communicated to the HACCP food safety team.

The HACCP plan is reviewed and updated by the HACCP team whenever changes in the production or the related processes occur. The HACCP system is verified at least once a year by the Food Safety team. The HACCP- plan including all CCP's with critical limits has been verified. No special issues have been noticed by the team.

The procedures for each CCP identify the corrective action to be taken when the limits are exceeded. Records are kept of adjustments made and any actions taken.

Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|---------------|
| | |

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3. Food safety and quality management system

3.1 Food safety and quality manual

The documented system is defined and made available to the several departments on paper or via software system

3.2 Document Control

The documented QMS system is organised and distributed to relevant staff via the electronic quality manual named '. No restrictions for use with valid password.

There are corporate procedures, applicable for all Vion sites. The documentation of these procedures is managed by the corporate QA department. The local procedures and work instructions are managed by the QA manager of the site. A document control procedure controls the issue of documents to ensure they are at the correct issue status at points of use or reference.

3.3 Record completion and maintenance

Record completion and maintenance are in good condition and retrievable. Records retained for 3 years as a minimum as common in the food industry. List of controlled documents is available and stored securely and is backed up.

3.4 Internal audits

Reference procedure: P-NLFood-10.030 v4 internal audits

Internal audits are performed by internal auditors the are trained and have sufficient knowledge of the products and processes. Findings of audits are taken in the meetings and in the action lists. In this the auditors and auditees are involved directly.

Senior management is involved in the audits in a sufficient way. Internal audits are performed according planning (2020). Audits are planned throughout the year. Schedule is based at 1 unannounced and 1 announced internal audit (by QA from other location or HQ employee of internal audit team). Further 1 yearly BRC fundamentals internal audit and 2 animal welfare internal audits on site.

All chapters of the system are audited with the related implementation in production. The last year's internal audit plan was reviewed, and the findings related to food safety were all closed. The root cause analysis, correction and corrective actions showed satisfactorily the closure of the non-conformance. Verified the internal audit Q2 and Q4 All actions are also collected and discussed in the HACCP meeting and minutes of this meetings and an action list is available.

Hygiene inspections are daily (pre-SSOP's and SSOP's); quarterly verification of the cleaning process. Action points related to the pre-SSOP and SSOP are daily discussed in the Tier1 meetings and corrective actions are taken quick and effectively. Beside the day-to-day there are quarterly inspections done by the managers of the production departments at the construction and prerequisite programme demands of the site. Deviations are discussed in the Tier1 meetings and the follow up is demonstrable via action lists.



3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The purchase- and delivery/transport process of pigs is the responsibility of Vion Farming, which is located at the HQ of Vion in Bostel.

Vion Apeldoorn takes care of the verification of the administrative documents related to the delivery of pigs at arrival and the day before. VKI checks are conducted and each farmer has to have an IKB-certification (only Dutch origin). Amount of ingredients is very limited (only salt related to food). So no high risk suppliers are decided.

The approval and assessment process of suppliers of non-food is centrally organised and managed by the central purchasing department at HQ Vion. A local database is in use to manage local suppliers and to evaluate non-food suppliers to give input to HQ.

Seen evaluation of some packaging and service suppliers related to Vion Apeldoorn; e.g. (waste collection), (laboratory), (Pest control), (cleaning), (transport and crate washing) and (packaging) (crate washing), (crate washing organs) and transport and processing cat 3 materials.

The plant is reporting complaints and gives input for the assessment at a yearly base. Report about assessment results 2020 is seen; there are no bad performing suppliers in Apeldoorn acknowledged

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Control of administrative documents related to the delivery of livestock. (IKB/UBN nr, origin). Also check at animal welfare aspects. Incoming packaging products are controlled at quantity, traceability and quality aspects. Records of delivery seen in the vertical test; no remarks

3.5.3 Management of suppliers of services

The plant is reporting complaints about services and gives input for the assessment at a yearly base. Is verified for several suppliers as (Quality control), (Cleaning), (Pest control) (crate washing) and is demonstrable in the supplier evaluation.

3.5.4 Management of Out sourced processing

No outsourced processes under scope.

3.6 Specifications

Specifications of raw materials, packaging and finished product are based on items regarding to suitability for its purpose and (migration) tests/declarations. Specifications are provided in company format for finished products.

The specifications are authorised and controlled.

All specifications are stored in a database MDM and are part of an online specification system.

For technical specifications is in use. In this application all (food grade) greases and chemicals are listed.

Specifications were available in an actual version and are available for relevant staff (MT).

Specifications contain relevant aspects and requirements; they include key data to meet customer and legal requirements and assist the user in the safe usage of the product. Specifications are reviewed at least every three years. Reviewed several specifications during the audit:

- Packaging: Ldpe Orange sheets from supplier , (including DOC on migration)

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- Finished product:
- Finished product:
- Finished product:
- Cleaning agents: Cleaning solvent

3.7 Corrective and preventive actions

The system of lean management / VOS 2.0 is used for the management of corrective and preventive actions. There are team huddles, 3x shift, with a defined agenda. Daily tier 1 meeting and weekly tier 2 meetings. Escalation model in order to manage a timely corrective action.

In case of the need of an in-depth root cause approach A4 (tier 1 level) and A3 (MT level) forms are in use. Verification reports are written. Several actions lists are in place in xlsx to guide meetings and responsibilities.

This procedure works effectively, this is verified during the audit for non-conformities identified by staff, through complaints, internal audits, third party audits etc.

Corrective actions and preventive action system is up to date. The handling of these non-conformities is according requirements.

3.8 Control of non-conforming product

Non-conforming products / products on hold are physically identified as such. In the expedition area a dedicated corner is seen for returned products from customers and non-conforming products.

During the site audit no blocked batches were seen of finished goods. The expedition supervisor and production manager are authorised to release a blocked batch.

The QA manager is verifying the process at a regular base. The registration forms of blocked and returned batches are available and verified. Files are complete; release of batches is done in conformity with the procedures.

In the slaughtering house the control on non-conforming product is also under control of Dutch Authorities. All conforming carcasses are stamped with a mark NL-312-EG to release into food chain. CCP on tarnish.

3.9 Traceability

Traceability system is documented and implanted.

It covers raw materials through work in progress to finished product including packaging materials and distribution. This system is fully based on written documents, batch codes and bar codes.

- Pigs bear an earmark (+ accompanied by track record and VKI)
- Half carcasses get an EG-mark + serial number (together with date of slaughter + livestock status / origin)
- Technical parts get a batch code (EG-mark + date of production + origin)
- By-products get a batch code (date of slaughter / production)
- Primary packaging materials are traceable via the first- and last date of use of a batch
- Returned product (destination form).

No consumer packed end products are applicable.

Traceability system operates through computer system and paperwork enables trace of raw materials and packaging from supplier through processes to packing and dispatch.

Planned 1 tests a year. Last report including mass balance (seen test 2020-12-07) is carried out within 3.75 Hrs.

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With a vertical audit list, during the audit traceability was tested on product ' , slaughter on 2020-10-12, deboning on 2020-10-13 Fast tracing (forwards/backwards), including packaging was possible in the records/ System.

Seen product specifications of all raw materials and finished product, receipt records, food compliance certificate is verified. Fully traceable one-step-up and one-step-down the system, including packaging. In coming control checks, production checks, calibration and analyses were verified too. Time to perform the test was respected (3.25h). Rework is not applicable.

The company implemented a sufficient traceability system. 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.

Conclusion: traceability system is working properly. Mass Balance is complete. Packaging is also traceable. Verified records of all relevant documents (dispatch documents, CCP records, livestock information, pre-SSOP, SSOP, pre-shipment, registration of knife management) were found.

3.10 Complaint handling

Complaints are received via the complaints inbox of the system (complaint registration system of Vion).

The complaints process is verified by the results in the quarterly management review. Complaints are processed in conformity with the complaint procedure. Periodic complaint analysis is part of the monthly quality report and the quarterly management review.

Change in the trend in the number of complaints, as a new customer groups and products create other categories.

Actions towards suppliers and internal processes could be demonstrated. Good attention to root cause was observed. Trends show good results.

Trends analyses show a decrease of complaints. Complaint are divided in complaints received from Vion sales and received from (another Dutch meat producer). All results for 2020 are within KPI's. From Vion 155 complaints in 2020 (was 270 in 2019) of which a total 39 on possible food safety issues and integrity 8 complaints were received.

In 2020 no major issues with authorities.

3.11 Management of incidents, product withdrawal and product recall

Reference procedure: P-VION-10.015 Management of incidents, product withdrawal and product recall.

Recall and withdrawal procedures are including the activities, the list of contact persons and the replacement scheme, as well as a checklist, and overview of specialist to consult, and the national recall scheme from the authorities.

No withdrawals applicable since the last audit. Permanent contact person is always available in the organisation.

The recall notification to the CI has been included in the procedure, stating that the Certification Body will be informed within 3 days of the event of a recall.



Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|---------------|
| | |

4. Site standards

4.1 External standards

Suitable located building containing enough space. No adverse activities in the surrounding area. Site is suitable maintained and well equipped; makes a logical and safe way of processing possible. The factory is situated in a light industrial area, well maintained external areas. No special risk identified. Total area of the plant is with a fence. There are no potential risks associated with the site that may affect product safety or integrity.

4.2 Site security and food defence

There's site security by an external contracted security porter arrangement (2-shifts) and by service during night hours. Controlled entrance for staff in place with badge control on all potential entry points to the plant. Staffs have been trained in site security procedures. Registration of visitors is part of the intake procedure at the porter lodge. The site is registered by the NVWA (official approval NL-312-EG). The security arrangements are yearly reviewed as a part of the reassessment process. Documented assessment Food Defense 25-11-2019.

The security arrangements are yearly reviewed as a part of the reassessment process. Documented assessment in P-APD-NL-10.201

Seen Central document P-FOOD-10.051.

4.3 Layout, product flow and segregation

The lay out and flow of the processes is based on levels of contamination; logic product flow – low risk. A lay out with flow of processes and movement of personnel is present.

A clearly described zoning by color for the plant is introduced. The plant has 8 zones. Each zone has dedicated instructions about safety aspects (helmet, ear protection, safety boots) and hygiene aspects (for example clothes, snoods, disinfecting of shoes).

Given a map of all flows of people, materials such as waste, auxiliary materials, including clear separation of dirty and clean material.

Separate rooms are in place between raw material intake, production, packing and storage areas.

The workers of the "dirty" slaughtering department have their own sanitary and canteen facilities even as the personnel of the intestines department. Premises are suitable for the intended purpose.

Process flow is straight forward and agreed with the Dutch Food Authority (NVWA).

Premises allows sufficient working space and capacity to work in a proper way. There were no temporary constructions noticed during this audit.

There is a site plan for the plant. The routing for the removal of waste products is demonstrably stated.

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The processing and packaging parts of the production are designed to prevent contamination risk. Based upon a risk assessment and the BRC decision tree all zones are "low risk areas".
No high risk, high care or ambient high care.

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

The fabric and internal condition of the site is suitable and satisfactory for the process. Walls, ceilings and floors are generally suitable.

Based at the results of the monthly hygiene audits and daily pre-SSOP and SSOP checks a continuous maintenance program is running to maintain the condition of the site.

Walls, ceilings and floors are generally suitable. Indoor storage of packaging materials in a former production area, walls are tiled.

Suitable packaging areas are in production halls.

Drainage is sufficient.

Ceilings and overheads are made of cleanable materials and limited condensation with correct removal procedures applicable.

Tube lights are adequately covered. Condition is controlled daily with SSOP checks.

Stunning process with CO2 equipment. Process of unloading pigs, floating of pigs into stable and towards the process is suitable organized with visible attention for animal welfare aspects.

4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good degree.

The water used for cleaning and process is water from mains supply.

This has been tested 4 times a year for both microbiological and chemical quality. The samples are analyzed by (RvA ISO 17025 accredited laboratory).

Water quality is defined as a general control measure.

A water distribution plan is available, the new situation is not yet in the final plan but still available in concept, the tabs are in the testing program.

The results of the monitoring plan are verified; all results were within the legislation standards.

4.6 Equipment

Equipment installed is suitable and designed for the intended purpose and used to minimise potential contamination.

Equipment is specified, tested and commissioned before commercial use, Use of well-known brands of equipment for food applications.

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

Equipment made of stainless steel.



4.7 Maintenance

Maintenance is managed with Ultimo system.

Ultimo maintenance programme is also used for administrative purposes.

The actual list of work orders is verified; priorities are set; orders related to food safety aspects are processed with a high priority, backlog is limited, and all orders are scheduled.

KPI's maintenance are defined and the trends are developing favourably. There was a project for the maintenance department past year on 5S in the workshop, which is closed.

Daily team huddle with the technician. Feedback about daily maintenance works and breaks downs in the Tier 1 meeting.

Hygiene clearance is the responsibility of the supervisors of the production areas (SSOP). There is a list of necessary building works 2021.

In order to reduce the contamination with lubricant only food grade lubricating plan is finalised. The storage of lubricants is checked;

Technical & MSDS sheets are available.

There are 4 compressors for the compressed air equipment, 2 old, 2 new. The equipment is supervised by an external contractor and filter types and greasing is suitable and under verification.

4.8 Staff facilities

There were suitable changing rooms. The rooms are sited near production, there are three separate staff facilities (m/w): one for the employees of the dirty slaughter department, one for the pork cutting and expedition department and one for the intestines department.

Lockers for personal clothing/items are present. Separate storage of outdoor clothing is present. Washing of clothing is by an external company.

Well-equipped hand washing facilities in a hygiene sluice. Liquid soap, warm water single use paper towels/ blowers, taps with hand-free operation and clear advisory sign to prompt handwashing.

Well-designed canteen. the canteen has its own HACCP plan and procedures. Smoking is only allowed in a dedicated area. Well controlled facilities.

There is a clear policy regarding in the hygiene rules to food brought into premises; only to be consumed in the canteen. A refrigerator is provided for staff use. Eating is only done in the canteen. A flat screen is in use to communicate with the workers for items needed. Adequate changing/locker facilities; hand washing; toilets; canteen and facilities/staff food.

The factory is totally non-smoking. Smoking (including e-cigarettes) is only allowed in a separated area of the rest room.

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

4.9.1 Chemical control



All chemical containers (with cleaning chemicals, clearly labelled) are separated stored. Cleaning chemicals are stored in a container on the premises away from production area with restricted access. MSDS sheets are available on the spot.
Satellites to dose the chemicals are installed. All approved chemicals are suitable for food production areas.
Only trained persons have access to these chemicals

4.9.2 Metal control

The HACCP study has determined that metal detection is not necessary a CCP.
The metal detector is of the slaughter by-products department is in use for tongues, as pigs can eat some small metal parts which can be found in tongues.
Metal hazard is controlled by metal checks (machine / knife intactness / counting numbered sets) in relation to the hazard analysis. Registration and corrective actions could be demonstrated.

A knife handling policy is in place. Records of knife counting seen in the vertical test in intestines department on F-ADP-NL-10.161.

4.9.3 Glass, brittle plastic, ceramics and similar materials

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic.

This is verified for several items all area is listed at the actual glass register.

Glass / hard plastic audits are regularly carried out: by production department (daily pre-SSOP and SSOP) and by QA (reduced check: 1 x / month for open product situations –and full inspection: 4 x / year).
Records of breakage and corrective actions are listed.

Seen records of quarterly inspection in vertical test.

4.9.4 Products packed into glass or other brittle containers

No use of glass or other brittle containers as packaging material

4.9.5 Wood

Wooden pallets are not permitted in production areas

4.9.6 Other physical contaminants

Blue metal detectable pens usage and breakage dangers are controlled (verified during audit on production floor).



4.10 Foreign-body detection and removal equipment

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

Procedures are in place to control risk for contamination of the product. Potential danger is defined in the HACCP study. CCP's are defined, as well as PRP+'s.

Critical and action limits are set.

Monitoring programme by Pre-SSOP and SSOP checks and verification by responsible team leader. Foreign body alertness has the attention of all people dealing with products.

Detection equipment (metal detection) is installed as result of a customer specifications and is in control as a CP when producing for that customer. Further there is a X ray also a result of customer specifications.

No magnets or special filters installed.

4.10.2 Filters and sieves

No filters and sieves

4.10.3 Metal detectors and X-ray equipment

Detection equipment installed as result of a customer specifications and are controlled as CP's.

The used metal detector is based at a belt stop system. Check at performance before and after the packaging process of tongues.

The x ray also has a stop system and a belt turning system with deviating material to be thrown out. The x ray is installed in 2018 (mainly on product fat content). Good control was observed.

Validation is done and included in pre SSOP, SSOP and glass register.

In case some metal parts are found this will be given to the technical department to analyse the course of the foreign object.

4.10.4 Magnets

No magnets are used into the process.

4.10.5 Optical sorting equipment

No optical sorting equipment is in use.

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

No products packed into glass/brittle containers. controls are in place.

4.11 Housekeeping and hygiene

Cleaning mainly by external company according schedules with frequencies and applied agents and procedures and cleaning schedules 2021. Cleaning is done as common in the branch: dry cleaning, flushing, foaming, (this includes disinfection), flushing. This is done on a daily base. Seen records of cleaning within the vertical audit.

During the tour the production line that is only used for a Japanese customer assesses in detail for cleaning suitability. Production line is suitable for efficient cleaning and was visually clean.

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Daily start-up checks with visual inspections are carried out, verified Pre-SSOPs. Corrective actions are clearly defined and timely handled and shared with NVWA. In general, good results of cleaning could be noticed in practice.

Weekly control at disinfection process by agar checks. Results 2020 are trended and verified. Incidental higher values, corrective actions are demonstrable, but overall good results.

Residue checks are done at a 2-weekly base. Validation by agar checks on critical places (part of environmental monitoring programme). Results of agar checks are reported periodically and as a KPI in the Q-base management review.

4.11.7 Cleaning in place (CIP)

CIP is not applicable.

The company has a tank for the storage of blood for human consumption. There's a CIP cleaning at this tank. The tank is owned by the customer of the blood, the CIP process is not the responsibility of Vion Apeldoorn and not a part of the scope of the BRC audit.

4.11.8 Environmental monitoring

Environmental monitoring program is in place, typical sampling areas, organisms being assessed, frequency of testing, procedures for out of specification results are identified and verified. An environmental swabbing monitoring programme on Listeria is implemented (seen for 2020 and 2021). Listeria and Salmonella swabs are taken on critical places (e.g. "zweep machine (whipping machine), liver cool unit, spray tunnel) places decided on base of risk.

Some incidental findings. In case of finding, corrective actions and resampling are required.

Records show good follow up. Swabs are analysed by accredited laboratory.

Also, residue tests are performed. equipment and floors. Verified the overview of results in the computer. A clear review and trend analysis is taken into the management review (no issues).

4.12 Waste

Waste is identified, collected and removed from the production areas regularly. Bins are covered to prevent cross contamination. Waste is stored in marked containers in the production and on the premises before it is being disposed of. No accumulation of waste seen during site tour.

Waste is organized by [redacted] and [redacted] (Contracts are applicable). This company is all qualified for disposing these kinds of materials.

4.13 Management of surplus food and products for animal feed

NA, in conformity with the legislation it's not allowed to give surplus food an animal feed destination.



4.14 Pest management

The company has a contract with an external pest control service provider
Contract of is available 8 times a year in-dept inspections). Site map is available.
Actions are taken and described in the action reports. Once a year pest control survey is performed, verified report of 2020-11-20
Specifications of products / MSDS sheets are available online through the digital pest control system of the pest controller. Diploma of the pest controller is available and valid.
Trend analysis during management review. Layout (with location of bait stations and monitoring stations is available. Baits used are non-toxic, toxic baits are only used in case of infestation. Bait stations are robust, made up of plastic material, secured in place and appropriately located to prevent contamination risk to product. During the site inspection no problems with pests were detected.

4.15 Storage facilities

Good storage of packaging, ingredient (Salt) and product are seen.
The storage facilities are suitable in relation to the operation.
Warehouses are clean, dry, well ventilated spaces protected from dust, condensation, fumes, odors or other sources of contamination. Waste materials and chemicals (cleaning products, lubricants, and pesticides) are stored separately. Good warehouse practice audits are performed
Temperature of storage areas of intestines and other areas is in (assessed at 2021-02-03).
Stock rotation is controlled by the FIFO system.

4.16 Dispatch and transport

Dispatch and release of products is based at the preshipment protocol of Vion (CCP verification).
Products and trailers are inspected before loading.

Product is loaded in covered bags. Only use of approved transport companies.

All transport is subcontracted following the central arranged procedure. VION Food (central office) is contract owner. The content of the contract complies with the requirements. VION reviews the performance of these transport companies () by transport audits.

Dispatch process is verified for 2020-10-13; in the vertical test. CCP checks and preshipment procedures

Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|--------------------------------------------------------------------|
| 4.9.4 | No use of glass or other brittle containers as packaging material. |
| 4.9.5 | Wooden pallets are not permitted in production areas. |
| 4.10.2 | No filters and sieves. |

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| | |
|--------|----------------------------------------------------------------------------------------------------------|
| 4.10.4 | No magnets are used into the process. |
| 4.10.5 | No optical sorting equipment is in use. |
| 4.10.6 | No products packed into glass/brittle containers. controls are in place. |
| 4.11.7 | CIP is not applicable. |
| 4.13 | NA, in conformity with the legislation it's not allowed to give surplus food an animal feed destination. |

5. Product control

5.1 Product design/development

No product design /development activities are taken place at this site. No production of product directly to consumer. At corporate level a development procedure is available.
Systematic HACCP analysis and food safety assessment is integrated in the process of developing new products or modifying existing products.

5.2 Product labelling

Vion Apeldoorn BV is producing single meat products. Labelling aspects are production date and land of origin.

Labelling according to legal aspects as required by the company, several checks done during production tour.

Raw materials are special labelled on the racks and ready to ship product are provided with a crate label with the legal and customer-specific data.

Shown were good results for the product of the vertical traceability test.

5.3 Management of allergens

Vion Apeldoorn has added (cross) contamination of the allergen sulphite in the process control plan including a risk assessment.

Vion Apeldoorn uses sulphite only in a closed system in a separate room in the gut department.

Cross contamination is mentioned as CP 27 and controlled daily in the SSOP check.

The correct handling method of sulphite for category 3 material is written in the procedure P-APD-NL-10.190



5.4 Product authenticity, claims and chain of custody

A central Vion procedure "Product voedsel fraude" (latest version 05-08-2019) for Food Fraud has been implanted (including planning for yearly review). No high-risk ingredients for Vion Apeldoorn (nearly no ingredients; salt).

For pigs the company has several product integrity lines (Organic and BLK "beter leven") and the system should be ready to produce all lines available at VION as in case of a main breakdown at sites Vion Groenlo or Boxtel, or pig diseases creating logistical constraints.

The company has had a SKAL recognition (Organic).

The company is audited every year against the requirements of the IFS-PIA requirements by LRQA. There are no structural issues reported during this audit.

This is a certification standard related to product integrity of sustainable meat. Daily check at mass balance and reported at a weekly base to the site manager.

No claims on allergens.

5.5 Product packaging

In general, suitable packing procedures and materials with relevant (food contact suitability/migration) specifications.

Return of packaging materials towards storage area does not take place. Coloured in liners are applied depending on the content and origin of the life stock (GF, MS, FS, BIO).

Based upon sampling packaging materials specifications reveal food safe declaration, e.g. Regulation 1935/2004/EC. Packaging of products from vertical audit checked assessed including declaration of conformity.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

All microbiological analyses are outsourced to a contracted ISO17025 recognised laboratory (

Shelf life tests are taken place, but this is coordinated by the central QA department in Boxtel.

Plan on sampling is described in F-APD-NL-10001. In the plan pathogen testing is 4x/y which is done in 2020.

Daily samples at carcasses (PCA, entero's) and 2-weekly check at several pathogens (Salmonella, STEC, Listeria). Reports of result in Quality Trend. Some incidental salmonella findings.

Listeria plan in place as in the past some areas of concerns were known.

In case of finding, corrective actions and resampling are required. Records show good follow up.

Also a program on chemical residues is in place.

5.6.2 Laboratory testing

The company has a full updated product sampling and assurance program available to verify that products are in accordance with buying specifications and legal requirements. CoA's are supplied by the suppliers.

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The QA reviews these results and if they are conform. The products are all low risk and the suppliers are certified.

Analyses are done on both products and surfaces in relation to cleaning. Clear overviews are available. In the management review an overview is taken as well.

No laboratory present on the site.

The agar analysis on contact surfaces is done by the plant itself

External analysis via y ISO 17025 accredited

Verified several analyses performed throughout the year.

Shelf life testing is applicable on Central level (VION Boxtel).

5.7 Product release

Product release is based at the preshipment procedures. Product release is based upon product temperature measurements (CCP) before dispatch. 5 samples are taken of every batch. Checked during vertical audit and site tour; good organised. No positive release system in place. Only authorised personnel (QA manager / production manager) are allowed to release non-conforming products.

5.8 Pet Food

The site does not produce pet food.

Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|-----------------------------------|
| 5.3.7 | No internal laboratory |
| 5.6.2 | No petfood |
| 5.8 | No on-line vision equipment used. |

6. Process control

6.1 Control of operations

The site clearly demonstrates a good control of operations. Process conditions and methods are well checked. Systematic monitoring is demonstrated.

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Is verified for the daily SSOP checks of the process in the dirty slaughtering department.
Process checks done at animal welfare aspects, stunning (CO2), scalding and killing. Standards are defined in document process check dirty slaughtering. No deviations seen.
Good practise seen for animal welfare aspects: quiet and controlled atmosphere in the stable of livestock.

During production the correct application of CCP's is monitored and verified on a day to day basis.
Process is validated to demonstrate that it is capable of producing safe, legal and quality products.
Process control is based upon the HACCP study, legal and customer requirements.

The main change- over moment in the process is the startup of the process in the morning. This is controlled via Pre-SSOP systematic (cleaning, sterilizers, glass, maintenance checks).

Correctly organized; corrective actions are done and reported in case of deviations.

6.2 Labelling and pack control

The used procedures to control labelling and pack control are documented and are simplified after the introduction of the MES applications and the extra scale.

For the Japan, Korea and China product the 1st and last used label of a batch is glued on a recording form to control the use of the right label.

No label change over seen, this because all products that were packed for 1 customer only with different delivery locations.

Seen labelling of pallet and verification in the MES system at the expedition department.

Process and registrations are verified in the vertical test of 2020-10-13.

6.3 Quantity, weight, volume and number control

All products are sold and invoiced by actual weight. Metrology controls the balances for commercial purpose. The devices are tested internally on a daily basis.

Weighing equipment (legal) is calibrated once a year. Records are available as all scales are taken up in the and calibrated in time, calibration certificates are available and seen.

6.4 Calibration and control of measuring and monitoring devices

Calibration procedures ensure relevant equipment is identified and regularly calibrated. Critical measuring equipment is thermometers (CCP related), weighing scales, metal and x ray detector.

Calibration with 2-monthly frequency (thermometers CCP), 6-monthly frequency (other thermometers) or yearly frequency (balances, PT 100) is adequate according to the calibration records. No adjustments are possible. Records checked; no remarks.

Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|-----------------------------------|
| 6.2.4 | No on-line vision equipment used. |

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7. Personnel

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

All workers (including contracted workers) are trained in Food defence. Principles of Food hygiene and food safety, Health and personal hygiene and Produce safety standards. All personnel engaged in activities relating the production has followed relevant training. Verified training records (Internal general training including CCP/ HACCP training, food defence and food fraud). Training will be given once every year.

Employees sign for the house rules prior to start working as well.

Clear responsibilities/competences have been documented, including arrangements in case of absence of the responsible staff.

The profile for the foreman was shown.

New (temporary) workers are trained and instructed before they start working.

There's an instruction film in several languages for this purpose. Records of this introduction training are verified for some operational employees.

Effectiveness of training is verified by the use of questionnaires; new workers should have a result of 80%. Refresher training is organised at a regular base.

Seen CCPs training (2020-11-20, 2020-10-02, 2020-06-05) and Food Defence training (2020-06-04, 2020-09-01).

Employees taking care for CCP controls, are demonstrable yearly trained. Also animal welfare training is in place, seen in plan. All sampled training records were demonstrable.

A clear record of Comments on compliance & food safety training, indicating sample size and effectiveness.

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

The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel through brochure and a new company film "Werken bij VION" (in 7 different languages) prior to commencing work.

These are also part of the housekeeping instructions inside Vion.

The wearing of jewellery is not allowed.

Only metal detectable plasters are allowed in production areas.

Correct use of blue plasters observed and no remarks during the audit.

Use of metal detectable plasters is applicable last batch checked through metal detector F-APD-NL-10.141 (2021-01-19).

Well detailed hygiene rules are documented, rules are available in several relevant languages.

During internal audits and verification on Pre-SSOP / SSOP (with QA on shop floor) the effectiveness of training is monitored.

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7.3 Medical screening

Medical screening is part of the privacy policy in The Netherlands.

Adverse conditions in health must be reported by completing a medical questionnaire before entering production.

Also applicable for visitors. (signature is required).

Staff are made aware of their responsibilities regarding notification of illness/risks of food borne disease records of this training are in place (werken bij Vion).

Persons who are suffering from a relevant infectious disease are not allowed to enter the production facilities.

The company has taken various strict measures in connection with the covid-19 pandemic, as a result of this every employee is asked daily if he is bothered by the associated symptoms of Covid-19. Once a week, everyone is tested for the presence of the covid-19 virus.

Medical screening documents are available and signed by the employees and doctor also needed for NVWA legislation on export to certain countries.

7.4 Protective clothing: employees or visitors to production areas

All employees (including temporary workers and visitors) are wearing protective clothing (inclusive work shoes).

Protective clothing includes white or blue trousers, jackets and rubber boots / shoes.

Disposable hairnets are applied, all hair is enclosed.

Disposable gloves are worn where necessary. Protective clothing is removed when the employee is leaving the production areas.

Operators know the house rules very well on gloves. Good adherence to the dress code observed during the site evaluation.

The external laundry complies with the requirements of the Global Standard for Food Safety.

This is a low risk operation.

There are sufficient facilities to clean shoe soles, gloves and knives.

Details of non-applicable clauses with justification

| Clause/Section Ref | Justification |
|--------------------|---------------|
| | |
| | |

| | | | |
|------------------|------|---------|-----|
| Template control | Food | Version | 1.0 |
|------------------|------|---------|-----|

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8. 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

No High-Risk, High-Care or Ambient-Care applicable.

8.2 Building fabric in high-risk and high-care zones

No High-Risk, High-Care or Ambient-Care applicable.

8.3 Maintenance in high-risk and high-care zones

No High-Risk, High-Care or Ambient-Care applicable.

8.4 Staff facilities for high-risk and high-care zones

No High-Risk, High-Care or Ambient-Care applicable.

8.5 Housekeeping and hygiene in the high-risk high-care zones

No High-Risk, High-Care or Ambient-Care applicable.

8.6 Waste/Waste disposal in high risk, high care zones

No High-Risk, High-Care or Ambient-Care applicable.

8.7 Protective clothing in the high-risk high-care zones

No High-Risk, High-Care or Ambient-Care applicable.

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| Details of non-applicable clauses with justification | |
|------------------------------------------------------|-----------------------------------------------------|
| Clause/Section Ref | Justification |
| 8.1 | No High-Risk, High-Care or Ambient-Care applicable. |
| 8.2 | No High-Risk, High-Care or Ambient-Care applicable. |
| 8.3 | No High-Risk, High-Care or Ambient-Care applicable. |
| 8.4 | No High-Risk, High-Care or Ambient-Care applicable. |
| 8.5 | No High-Risk, High-Care or Ambient-Care applicable. |
| 8.6 | No High-Risk, High-Care or Ambient-Care applicable. |
| 8.7 | No High-Risk, High-Care or Ambient-Care applicable. |

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| |
|-------------------------------------------------------------------------------------------------|
| 9 - Traded Products |
| 9.1 Approval and performance monitoring of manufacturers/packers of traded food products |
| Click or tap here to enter text. |
| 9.2 Specifications |
| Click or tap here to enter text. |
| 9.3 Product inspection and laboratory testing |
| Click or tap here to enter text. |
| 9.4 Product legality |
| Click or tap here to enter text. |
| 9.5 Traceability |
| Click or tap here to enter text. |

| | |
|-------------------------------------------------|----------------------------------|
| Module 11: Meat supply chain assurance | |
| Scope | Click or tap here to enter text. |
| 11.1 Traceability | |
| Click or tap here to enter text. | |
| 11.2 Approval of meat supply chain | |
| Click or tap here to enter text. | |
| 11.3 Raw material receipt and inspection | |
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11.4 Management of cross-contamination between species

Click or tap here to enter text.

11.5 Product testing

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11.6 Training

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Module 12: AOECs Gluten-free Foods

Scope

Click or tap here to enter text.

12.1 Senior management

Click or tap here to enter text.

12.2 Management of suppliers of raw materials and packaging

Click or tap here to enter text.

12.3 Outsourced production

Click or tap here to enter text.

12.4 Specifications

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12.5 Management of gluten cross-contamination

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Click or tap here to enter text.

12.6 Management of incidents, product withdrawal and product recall

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12.7 Labelling

Click or tap here to enter text.

12.8 Product inspection and laboratory testing

Click or tap here to enter text.

Module 13 FSMA Preventive Controls Preparedness Module

Version 2 July 2018

| Clause | Module item | Conforms Y/N | Comments |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------|
| 13.1.1 | Handwashing areas, dressing and locker rooms, and toilet rooms must have adequate lighting. | | |
| 13.1.2 | Water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage. | | |
| 13.1.3 | All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. | | |

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| | Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact. | | |
| 13.1.4 | Ice used in contact with food must be manufactured in accordance with Good Manufacturing Practice (GMP) requirements of 21 CFR 117. | | |
| 13.1.5 | Where defect action levels (DAL) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot. | | |
| 13.1.6 | The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: <ul style="list-style-type: none"> • Economic adulterants which affect food safety • Environmental pathogens where ready-to-eat (RTE) food is | | |

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| | <p>exposed to the environment prior to packaging and the packaged food does not receive a kill step</p> <ul style="list-style-type: none"> • Radiological hazards • Unintentional adulterants which affect food safety | | |
| 13.1.7 | All identified known or reasonably foreseeable hazards must be evaluated to determine "hazards requiring a preventive control" (i.e., significant hazards). | | |
| 13.1.8 | Establish one or more preventive control(s) for each identified "hazard requiring a preventive control" (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act. | | |
| 13.1.9 | Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures | | |

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| | <p>and responsibility for the following:</p> <ul style="list-style-type: none"> • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify recall is carried out • Appropriate disposal (i.e., destroy, divert, repurpose) of recalled product | | |
| 13.1.10 | Establish monitoring activities and a written procedure for each preventive control consistent with the requirements of BRC section 2.10. | | |
| 13.1.11 | <p>Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRC sections 2.11 and 3.7.</p> <p>Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).</p> | | |

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| 13.1.12 | <p>Validate all established process controls prior to implementation of the food safety plan, upon changes requiring re-validation or within 90 calendar days of the first food production.</p> <p>Validate allergen, sanitation and supply-chain controls as appropriate to the nature of the hazard, control and facility.</p> | | |
| 13.1.13 | <p>The PCQI (or authorized designee) reviews monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification.</p> <p>The PCQI (or authorized designee) reviews verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record is created.</p> | | |
| 13.1.14 | <p>Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following:</p> <ul style="list-style-type: none"> • Sampling procedure to include method, quantity, frequency, and | | |

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| | <p>number of samples</p> <ul style="list-style-type: none"> Analytical method Laboratory conducting analysis Corrective action procedure where pathogen is detected | | |
| 13.1.15 | <p>Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following:</p> <ul style="list-style-type: none"> Adequate number and location of sample sites Timing and frequency of sampling Analytical method Laboratory conducting analysis Corrective action procedure where pathogen is detected | | |
| 13.1.16 | <p>Devices used to verify preventive controls must be calibrated.</p> | | |
| 13.1.17 | <p>Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food</p> | | |

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| | <p>safety plan, validating preventing controls, review of records, and reanalysis of the plan.</p> <p>Document the PCQI's training and qualification via job experience.</p> | | |
| 13.1.18 | <p>All records required by 21 CFR § 117 must include:</p> <ul style="list-style-type: none"> • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable | | |
| 13.1.19 | <p>The owner, operator or agent in charge of facility must sign and date the written food safety plan initially and then upon any changes following reanalysis.</p> | | |
| 13.1.20 | <p>All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they</p> | | |

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| | must be retrievable within 24 hours with the exception of the food safety plan, which must remain onsite. | | |
| 13.1.21 | <p>Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities.</p> <p>Where a hazard requiring a supply-chain-applied control is identified AND the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.</p> | | |
| 13.1.22 | <p>Supplier approval must be documented before receiving and using raw materials and ingredients.</p> <p>Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.</p> | | |
| 13.1.23 | One or more supplier verification activities (defined in § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients AND periodically thereafter | | |

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| | at an adequate frequency. | | |
| 13.2.1 | <p>Human food by-products held for distribution as animal food must be held under conditions that will protect against contamination, including the following:</p> <ul style="list-style-type: none"> - During holding, human food by-products for use as animal food must be accurately identified. * Labeling that identifies the product by the common or usual name must be affixed to or accompany the human food by-products for use as animal food when distributed. * Shipping containers (e.g., totes, drums, and tubs) and bulk vehicles used to distribute human food by-products for use as animal food must be examined prior to use to protect against the contamination of animal food from the container or vehicle when the facility is responsible for transporting the human food by-products for use as animal food itself or arranges with a third party to transport the human food by-products for use as animal food. | | |

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| 13.3.1 | <p>A Qualified Individual (QI) is responsible for developing the site's food defense plan, conducting a vulnerability assessment, identifying mitigation strategies, and conducting a reanalysis of the plan. The QI responsible for developing the food defense plan shall be identified on the site's organizational chart.</p> <p>One or more QI's shall be responsible for implementing mitigation strategies at actionable process steps.</p> | | |
| 13.3.2 | <p>The site shall have a written food defense plan, which includes the following:</p> <ul style="list-style-type: none"> • A vulnerability assessment identifying significant vulnerabilities and actionable process steps • Mitigation strategies appropriate to reduce the vulnerability • Procedures for food defense monitoring, corrective action and verification | | |
| 13.3.3 | <p>A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates</p> | | |

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| | <p>the following key criteria (at a minimum):</p> <ul style="list-style-type: none"> • Scale and severity of threat if a contaminant is added to product • Degree of physical access to the product • Ability of an attacker to successfully contaminate product—including consideration of an inside attacker <p>A vulnerability assessment shall be documented for each food type regardless of the outcome and provide justification as to why each point, step or procedure in the operation was or was not identified as an actionable process step.</p> | | |
| 13.3.4 | <p>Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment.</p> <p>Justification shall be documented explaining how the strategy</p> | | |

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| | significantly minimizes or prevents the vulnerability. | | |
| 13.3.5 | <p>Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies.</p> <p>Procedures shall include recordkeeping requirements for all monitoring activities.</p> | | |
| 13.3.6 | <p>Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria:</p> <ul style="list-style-type: none"> • Method for identifying and correcting a lack of implementation • Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions | | |
| 13.3.7 | <p>Written verification procedures shall be established and implemented to ensure that food defense monitoring and corrective action are performed according to procedures. Verification procedures shall describe activities to</p> | | |

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| | <p>verify implementation of mitigation strategies.</p> <p>Verification procedures shall include:</p> <ul style="list-style-type: none">• A review of monitoring and corrective action records within an appropriate timeframe (e.g., 7 days)• Other verification activities as appropriate (e.g., internal audit)• Method for verifying that reanalysis of the food defense plan was conducted• Frequency for verification activities• Recordkeeping requirements of all verification activities | | |
| 13.3.8 | <p>Reanalysis of the food defense plan shall be documented and performed every three years or whenever</p> <ul style="list-style-type: none">• A change in facility operations which creates a new significant vulnerability• Knowledge about a new threat applicable to the food or facility | | |

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| | <p>becomes known</p> <ul style="list-style-type: none"> • Mitigation strategies are not implemented as intended • FDA requires reanalysis based on new threats or scientific evidence | | |
| 13.3.9 | <p>All records required by 21 CFR § 121 must include:</p> <ul style="list-style-type: none"> • Date and time of activity being documented • Signature/initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable | | |
| 13.3.10 | <p>The owner, operator or agent in charge of facility must sign and date the written food defense plan initially and then upon any changes following reanalysis.</p> | | |
| 13.3.11 | <p>All documents and records relating to the food defense plan (i.e., all records required by 21 CFR § 121) must be retained at the facility</p> | | |

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| | for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food defense plan, which must remain onsite. | | |
| 13.4.1 | <p>Vehicles and transportation equipment must be maintained and stored in a sanitary condition appropriate for the intended use to prevent food from becoming unsafe during transportation. Where inspection reveals that vehicles or containers are not in a clean condition, they shall not be used.</p> <p>A documented procedure shall describe cleaning and storage practices of all vehicles and transportation equipment maintained by the site whether leased or owned and as appropriate for the intended use. The procedures shall be fully implemented. Cleaning activities shall be recorded.</p> | | |
| 13.4.2 | <p>The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver,</p> | | |

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| | <p>it shall ensure compliance with the rule.</p> <p>Responsibilities shall ensure transportation operations are conducted in a manner to prevent food from becoming unsafe during transport (i.e., apply controls) and that responsibility for compliance with the regulation is assigned to competent supervisory personnel.</p> | | |
| 13.4.3 | <p>Where the site arranges transportation, it shall document sanitary design requirements and cleaning procedures of vehicles appropriate for the type of food to be transported. These requirements shall be communicated to the loader and carrier.</p> <p>Where the site does not arrange transportation, the above provision shall be documented in the shipping service contract to ensure the shipper documents sanitary specifications of vehicles for the loader and carrier, which are appropriate for the type of food.</p> | | |
| 13.4.4 | <p>Contracts with loaders shall specify that the loader is responsible for following sanitary</p> | | |

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| | specifications provided by shipper. | | |
| 13.4.5 | Where the site receives temperature controlled product immediately following transportation, it shall conduct an assessment to determine whether the food was subject to temperature abuse. | | |
| 13.4.6 | <p>Contracts with carriers shall specify that the carrier is responsible for the following sanitary activities where agreed to in writing with shipper.</p> <ul style="list-style-type: none"> • Sanitary condition of vehicles and transportation equipment • Following shipper's sanitary specifications (including pre-cooling requirements where applicable) • Recording compliance with operating temperature where critical to food safety • Procedures for the use of bulk vehicles, which includes recording the previous cargo and most recent cleaning for the shipper | | |
| 13.4.7 | Contracts with carriers shall specify that the carrier implements a | | |

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| | <p>training program for all personnel engaged in transportation activities, which covers</p> <ul style="list-style-type: none"> • Awareness of potential food safety problems that may occur during food transportation • Basic sanitary transportation practices to address those potential problems • Responsibilities of the carrier | | |
| 13.4.8 | The site shall keep all records related to U.S. transportation operations and transportation service contracts as original or electronic records for a minimum of 12 months beyond termination of the activity or contract. Offsite records shall be retrievable within 24 hours. | NA | |
| 13.4.9 | The recordkeeping policy shall ensure all sanitary design requirements and cleaning procedures for vehicles are maintained onsite and all offsite records are retrievable within 24 hours. | NA | |
| 13.5.1 | Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following: | NA | |

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| | <ul style="list-style-type: none"> Principles of food hygiene and food safety <p>Produce safety standards applicable to an individual's job</p> | | |
| 13.5.2 | <p>Personnel (permanent and temporary) who conduct harvest activities (including washing and cooling) must receive additional training on the following:</p> <ul style="list-style-type: none"> Recognizing produce contaminated with known or reasonably foreseeable hazards Inspecting harvest containers and equipment to ensure that they are clean, maintained and do not contaminate produce with hazards Correcting problems with harvest containers or equipment | NA | |
| 13.5.3 | <p>One or more supervisors or individuals responsible for the operation must have successfully completed food safety training equivalent to standardized curriculum recognized by the FDA.</p> | NA | |
| 13.5.4 | <p>A supervisor shall be identified with</p> | NA | |

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| | responsibility for the operation and ensuring compliance with Produce Safety regulation. This individual shall be identified on the site's organizational chart. | | |
| 13.5.5 | Personnel (permanent and temporary) shall avoid contact with animals or take measures such as hand washing and protective clothing to prevent contamination of produce and food contact surfaces following contact with worker animals. | NA | |
| 13.5.6 | <p>The water distribution system supplying agricultural water used for harvest, packing, holding—and associated equipment—shall be maintained, regularly inspected and equipment properly stored to prevent the system from being a source of contamination to produce and food contact surfaces. The system shall be inspected for conditions, which could introduce known or foreseeable hazards into or onto produce.</p> <p>Where testing of the water source or system inspection reveals contamination, deficiencies shall be corrected such as the repair of well caps or sanitary seals.</p> | NA | |

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| 13.5.7 | Agricultural water treatment must be delivered and monitored at a frequency that ensures water is safe, of adequate sanitary quality, and meets the microbial quality criteria of no detectable generic Escherichia coli (E. coli) in 100mL. | NA | |
| 13.5.8 | Potable water quality standards used shall ensure the microbial quality criterion is met, which is no detectable generic E. coli in 100 mL. | NA | |
| 13.5.9 | <p>Where agricultural water does not meet microbial quality criteria or is determined to be unsafe and not of adequate sanitary quality, water use must be discontinued along with treatment or other correction that reestablishes sanitary quality and microbial criteria.</p> <p>Where water treatment is not performed, re-inspection of the entire affected agricultural water system shall be conducted followed by the identification of conditions leading to the introduction of hazards into or onto produce or food contact surfaces, correction, and verification of correction to ensure water meets microbial quality criteria.</p> | NA | |
| 13.5.10 | Agricultural water testing may be performed by the site | NA | |

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| | <p>(or site representative) or by a third party provided representative samples of the site's water source is secured.</p> <p>Aseptic water sampling must be performed. The method of analysis for water testing is U.S. Environmental Protection Agency (EPA), "Method 1603: Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC), EPA-821-R-09-007," December, 2009 or equivalent method.</p> | | |
| 13.5.11 | <p>During harvest, packing and holding operations (e.g., hydrocooling, washing), manage water to maintain its safety and sanitary quality and prevent contamination of produce to include establishing and following a water-change schedule for recirculated water.</p> <p>Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris).</p> <p>Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to minimize</p> | NA | |

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| | infiltration of pathogens into produce. | | |
| 13.5.12 | Dropped produce (i.e., produce that comes in contact with the ground prior to harvest) where the produce would not normally touch the ground as a part of growing and harvest (e.g., cantaloupe, almonds, etc.) shall not be distributed. | NA | |
| 13.5.13 | Sewage disposal and septic systems shall be controlled and appropriate for the site to prevent the contamination of produce and food contact surfaces. | NA | |
| 13.5.14 | Plumbing shall not allow backflow or cross-connection between waste and potable water lines. | NA | |
| 13.5.15 | All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe after being made by the supervisor or responsible party. | NA | |
| 13.5.16 | <p>All produce safety documents and records must be retained at the site for 2 years after the record is created.</p> <p>Where records are stored offsite, they must be retrievable within 24 hours.</p> <p>Records related to equipment or processes used by the site for analyses, sampling, or action plans—including the results of scientific</p> | NA | |

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| | studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued. | | |
| 13.5.17 | <p>Specific additional requirements for the harvesting, packing, and holding of sprouts.</p> <p>Establish and implement a written Environmental Monitoring plan for the testing of <i>Listeria</i> spp or <i>Listeria monocytogenes</i>.</p> <p>The environmental monitoring plan shall include the following criteria:</p> <ul style="list-style-type: none"> • Target test (i.e., <i>Listeria</i> spp. or <i>L. mono</i>) • Sample frequency (no less monthly) • Sample timing (i.e., when in the process are samples collected) • Sample sites where the number of samples and location are sufficient to determine the efficacy of controls (includes food contact and non-food contact surfaces) <p>The plan shall describe aseptic methods for</p> | NA | |

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| | sample collection and testing according to FDA's "Testing Methodology for Listeria species or L. monocytogenes in Environmental Samples," Version 1, October 2015 (or equivalent). | | |
| 13.5.18 | <p>Specific additional requirements for the harvesting, packing, and holding of sprouts.</p> <p>The environmental monitoring plan shall include a corrective action plan if any samples are positive for Listeria spp. or L. mono.</p> <p>If Listeria spp. or L. mono are identified in the harvesting, packing, holding area, the following activities shall occur as a part of the corrective action process:</p> <ul style="list-style-type: none"> • Resample positive surfaces and the surrounding area to determine the extent of contamination • Clean and sanitize the affected and surrounding areas • Resample and re-test to confirm the elimination of Listeria spp. or L. mono • Conduct finished | NA | |

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| | <p>product testing as appropriate</p> <ul style="list-style-type: none"> • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce | | |
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