Audit Report

Global Standard Food Safety Issue 8

1. Audit Summary			
Company name	VION Apeldoorn BV	Site Code	1812048
Site name	VION Apeldoorn BV		
Scope of audit	Click or tap here to enter text.		
Exclusions from scope	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		
Justification for exclusion	none		
Audit Start Date	2022-11-30	Audit Finish Date	2022-12-02
Re-audit due date	2024-02-04	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	A+	Audit Programme	Unannounced
Previous audit grade	AA		Previous audit date	2022-01-13	
Certificate issue date	Select a date		Certificate expiry date	Select a date	
Number of non-conformities			Fundamental	0	
			Critical	0	

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2. Audit Results

	Major	0
	Minor	7

3. Company Details

Address	Laan van Malkenschoten 77 7302 HD Apeldoorn		
Country	The Netherlands	Site Telephone Number	+31 (0)889952919
Commercial representative Name		Email	@vionfood.com
Technical representative Name		Email	@vionfood.com

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	Europe Asia South America Oceania

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4. Company Profile	
	Choose a region Choose a region
Company registration number	NL-312-EG
Major changes since last BRCGS audit	renewal of equipment (esp a robot for the bellies); finalising of update of the lairage (pig welfare related); organic slaughtering (before only cutting);

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 pigs / week (pigs / hour) at one line. The slaughtering and cutting departments work in 1 shift system. 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), who also owns these pigs.

Livestock status from the slaughtered pigs is now on entrance and canalised as agreed with customer. (GF/IKB , QS/IKB, (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

- appr. employees of which appr. agency workers,

- area -meter square

- 1 HACCP plan

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5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category 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 salt / 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).
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 and cutting in pieces. Packaging of fresh meat/ organs (diaphragm, livers etc.). Production of intestines (salted)

6. Audit Duration Details

Total audit duration	20 man hours	Duration of production facility inspection	10 man hours

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6. Audit Duration Details	
Reasons for deviation from typical or expected audit duration	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), with a big part of is as cooling / storage. And a lot of employees doing the same job in the slaughter.
Next audit type selected	Announced

Audit Duration per day			
Audit Day	Date	Start Time	Finish time
1	2022-11-30	8.45	17.15
2	2022-12-01	8.30	17.00
3	2022-12-02	8.15	11.15

Audit Team	Auditor number	Name	Role
Lead Auditor			Lead Auditor
Second Auditor	Click or tap here to enter text.		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
QA employee	x	x	x	x
– Production Manager	X			x
– HR manager			X	x

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- Maintenance		x	X	X
, Cutting department manager	x		x	
– Slaughter manager	X	X		X
, QA employee				x
- Controller				x
several operators/ maintenance employees and others		x		

GFSI Post Farm Gate Audit History		
Date	Scheme/Standard	Announced/Unannounced

Document control			
CB Report number	RQA9732308_2022-11 UA		
Template Name	F834 Food Safety Audit Report Template v11		
Standard Issue	8	*Template issue date*	2022-02-15
Directory allocation	Food	*Version*	1.0

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Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	Clause	Detail	Critical or Major	Re-audit date

Critical			
No.	Clause	Detail	Re-audit date

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

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Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
		this row is an instruction for the client and will be removed for the final version of this report.	(alle tekst graag in **het Engels**) hoe is het probleem tijdelijk opgelost?	hoe de tekortkoming definitief zal worden opgelost zodat herhaling in de komende jaren niet kan gebeuren?	wat was de oorzaak van de minor ? en methodiek van oorzaak analyse (bijvoorbeeld “5 maal waarom?”)	Vult auditor in yy-mm-dd Hier graag verwijzing naar bijlagen in de mail (alle tekst in deze kolom zal worden verwijderd, is alleen nodig om de auditor te informeren over bijlagen). Bijv. Minor 1 procedure Minor 2 foto Minor 2 registratie Minor 3 etc.	Vult auditor in
1	4.4.8	The door to the outside from the cell for B.O. was damaged a lot (B.O. is for carcasses which needs to be checked extra by the government)	The door was fixed temporary with a material which is robust for the stainless steel cat. 2 boxes.	The employees should be aware of the consequences of damaging the door,	The damaging is caused by the employees who are transporting stainless steel	SSOP registration clean slaughter line	2022/12/20

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Minor							
				the hygienic is harder to control. If PM-check will be done in the slaughter line again, we will have less carcasses transported in this room. Plan is approved by the government. The door will be fixed robust for the stainless steel cat. 2 boxes at 30-12-2022.	cat. 2 boxes, which contains meat that's not fit for human consumption, against the door.		
2	4.5.1	Dry ice is used, this was seen in a plastic box with a blue plastic bag inside. On top of the box the box was not dry and not clean (tree leaves)	The drain is opened and the top of the box is cleaned and disinfected. Registration is on the SSOP.	We make an instruction to the employee to remove foreign bodies before the box goes to the production. The employee of entry control the boxes visually to be	The boxes are shortly stored outside before they get in. Water and leaves can end up the boxes when the leaves come from the trees	See procedure P-APD-NL-10.035 V13, 19-12-2022 SSOP registration dispatch	2022/12/20

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Minor							
				clean, dry and absence of foreign bodies. The box will be preventive disinfect before the box is transported to the department.	and when it is raining. The boxes are provided with a drain at the top, but the drain of this box was blocked, so the water couldn't be run off.		
3	4.10.3.3	There is an X ray in use, which is checked hourly. The instruction is not clear how the test pieces (with metal parts) should be placed. In practise the test is done with 3 pieces at once and without meat on the line, a photo is automatically made and saved of the detected foreign material (incl .date and time).	Procedure F-APD-NL-10152 is updated to BRC 9 chapter 4.10.3.5 standard. The method of calibration is cleared. Each calibration will be done with 3 pieces separately in the meat. The calibration at the start and in the end will be done at the same way without meat.	The training of the X-ray will be done in theory and practical each year. Effectiveness of the work method will be monitored in the SSOP and in the verification of the QA department (Q4-2022).	The procedure of the X-ray declared the calibration is correct if the photo marks all three test pieces. Employee were not trained specific to calibrate the test pieces separately.	See instruction on form F-APD-NL-10152 V8, 12-12-2022	2022/12/20
4	4.14.9	Pest control actions are followed in time, except for 2 open actions (open since	In week 06/07-2023 the implementation of the renovation of the building is planned.	Recommendations of our building which need an investment can be open for	The company which should do the renovation is	See message planning activities Follow up list recommandations	2022/12/20

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Minor							
		Nov 2021 about renovation of the building outside)		longer time but need to follow up in a year. The following up is depending on the waiting time before implementation. The speed of resolving actions is depending totally on this factor. We have a follow up list of recommendations of pest control were we give priority to the points low, normal, high and in which time it should be resolved.	not a supplier anymore. The priority was low, because it was not in production and the food safety risk is a minimum. We had already approached another company to do the renovation, but the waiting time is more than three months at this moment.		
5	4.16.2	A special person has to check the cleaning and disinfection of the trucks after delivering the alive pigs. He could not show that he did check the absence of disinfectant, which was also a part of his duty.	QA make a map of the procedures of cleaning the trucks, which clarified the responsibilities of the supervisor. The supervisor is instructed to do the visual control of cleaning and the residue measuring of the	The work method of the supervisor will be verified by the slaughter line managers every week and ad random by QA.	The supervisor was confused about the intended use of the indicator paper before and after disinfection of	See SSOP registration dirty slaughter line See verification of week 51.	2022/12/20

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Minor							
			disinfectant of each truck after rinsing.	We are going to educate two new supervisors for this function to replace the previous supervisor who is going to retirement in 2023.	the trucks. He did not know exactly what was written in the procedure about his responsibility of measuring disinfection.		
6	5.1.2	The sampling of blood is always done in a big tank. Now a small part of this blood (from the tank) is distributed in smaller plastic bags (10 or 20 litre). The validation of this process is only related to the temperature of the blood (keeping below 3 degree), but there is not checked if the flow diagram/ HACCP plan and other issues should be updated.	The flowchart for packaging blood to the customer for human consumption is updated and record in the procedure flowchart P-APD-NL-10014. No haccp changing is necessary. The validation of the self-life of the blood including the packaging was taken care of Vion Groenlo in 2021 and will be realized in 2022 at Vion Apeldoorn.	Next FTR more focus and awareness on distribution of packaging methods at existing products.	The whole organic flow was a new process which is validated in the FTR. The blood was part of all new specifications. Micro (self-life), temperature, labelling, packaging material, process of collecting blood, integrity and cleaning materials and	See procedure P-APD-NL-10014 V31 09-12-22	2022/12/20

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Minor							
					agars were arranged. The method of distribution was of the blood in smaller plastic bags was not seen as a new process.		
7	7.1.5	At the expedition was seen that red plastic ribbon to be used for the naked final product during loading, was touching the floor. This was not allowed and is part of the instructions (directly corrected by the manager)	Correction to the employee is done directly. Contaminated plastic ribbon is removed and new plastic ribbon is used for the carcasses. Registration is on the SSOP.	Verification of effectiveness instruction by QA (Q4-2022). Hygienic training employee yearly (planning 2023).	Employee were not aware of the contamination of the plastic ribbon.	SSOP Registration dispatch	2022/12/20

Comments on non-conformities
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Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit date

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	Date reviewed	Reviewed by

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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

There is a documented Food safety, Food Defence and Food Fraud policy which is confirmed by the senior management P-APD-NL-10.001 signed by the plant manager , 15/11/2021.

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. In these meetings the follow up of the objectives/targets is followed.

The HACCP verification is integrated in the yearly management review report. Management review reports were seen from: Q3 and Q2 (Q2 is the yearly overall MANAGEMENT REVIEW from June last year till July this year, dated 6/7/2022.

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. Not all targets from 2022 are reached (for several reasons, also because of projects are placed on hold, because of the financial crisis worldwide)

Examples of targets for 2022: climate optimalisation of warm working rooms combined with reduce of CO2 foot print/ further implementation of SAP, these projects are set on hold. Slaughtering of organic pigs is one of the goals which was reached well. An investment overview was seen (e.g. the implementation of a new belly opener robot). Also KPIs' are set and monitored (not all below the limits, e.g. Salmonella on carcasses is above the limit, an improvement plan is ongoing).

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. Communication with the employees on the shopfloor is part of this plan. There are sessions with the management about culture on e.g. 2/12/2022. Culture is a significative part of the management review, not only on Food Safety, but also on attitude, work ethics and how do you interact as a person.

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 (Vion Operating System): 5x/day team huddles, daily Tier1 meetings, weekly Tier2 meetings (trends, MT level), monthly Tier3 meetings (including monitoring progress realisation objectives).

Site has a list of all relevant legislation (NL-312-EG). Some issues was observed with the Dutch NVWA about condensation in cooling cellars / rust and grease (from the hanging rail) . An action plan is ongoing. In total, the Dutch NVWA has given 6 warnings last year (which is high, but last years this is not verry special in the Netherlands slaughterhouses). There is an intensive meeting program with the NVWA

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Vion reports all fines as soon as possible, following the agreements between LRQA and Vion. This means, in the case that Vion has to pay the NVWA for issues (reports for penalties), LRQA is informed as soon as possible by the head office. The last audit of the NVWA was from 19-22 Sept 2022, with no serious issues to be reported (besides the daily inspections).

All inspection and audit reports are quarterly published here: https://www.vion-transparency.com/location/vion-apeldoorn-b-v/

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 attended the opening and closing meetings and 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.

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 were checked and no reoccurrence was seen.

No issues were seen with the BRC logo.

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 sent by mail before to the audit,.

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.

Click or tap here to enter text.

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

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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 is integrated in the HACCP plan with 54 CP's assessed including the ones from the intestines department, described in P-APD-NL-10.023. Full product description including microbiological limits and shelf life is in place.
Daily check at CCP's and 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, with weekly meetings (tier 1); 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)). And daily NVWA inspection on CCP1.
CCP 2: Temperature of animal by-products (organs) at dispatch (≤3.0 ºC);
CCP 3: Temperature of fresh pork meat at dispatch (≤7.0 ºC)
CCP 4. Temperature of partially chilled pork meat for max 6h transport at dispatch (surface ≤7.0 ºC); last time needed 23/3/2022
CCP 5: Temperature of (returned) animal by-products (organs) at reception (≤3.0 ºC);
CCP 6: Temperature of (returned) fresh pork meat at reception (≤7.0 ºC);
CCP 7. Temperature of partially chilled pork meat for max 30h transport at dispatch (core ≤15.0 ºC or surface ≤7.0 ºC); (rarely done, not the case since last audit 2021)
CCP 8: Temperature of animal by-products (not anymore for salted testiness) at dispatch (≤ 3.0 ºC);

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.

Key process of flow diagram: receiving, killing, removing intestines, cutting, cooling, cutting, (bulk products (with bone, boneless, hanging products, and packed products), dispatch.
Flow diagrams are documented and actual (as part of the verification report). Flow diagrams Vion Apeldoorn including intestine processing. This is verified this audit for the several departments, no remarks.

The HACCP plan included a review of potential physical, chemical, microbiological and radioactivity related 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 >=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

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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 in the past, no updates needed since the last audit Jan 2022. 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 verification (called "reassessment") is integrated in the yearly management review report (seen last year report July 2021 – June 2022), 6/7/2022. 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.

Click or tap here to enter text.

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

3. Food safety and quality management system
3.1 Food safety and quality manual
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 ' ', but still paperwork is used to make records. No restrictions for use with valid password.

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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.
A tablet with an app is in use for most records, incl. CCP's ( ). 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 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 (yearly updated). 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.

Records checked this visit: announced 8/2 and 30/5 2022, unannounced 28/11/2022 (concept notes were seen).

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, equipment (also daily done by TD) and building 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. Records seen from August, Oct, Nov- Dec 2022. 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 Boxtel.
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 in in use to manage local suppliers and to

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evaluate non-food suppliers to give input to HQ. The plant is reporting complaints and gives input for the assessment at a yearly base. Seen updated list 10/1/2022.
There are no real bad performing suppliers in Apeldoorn acknowledged, although 1 of the supplier of the washed crates (also a client of meat) needs improvement, actions are discussed Nov 2022 (extra visual checks on the site at Vion are done for crates).

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.
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), (cleaning agents).

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 cover top from supplier (including DOC on migration)
- Finished product: trimmings 70/30 BLK *
- Alive pigs, received 31/8/2022 UBN
- Cleaning agents from (the whole range)
- Belts in the factory from

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.
The use of the tablet with app for records is working well.

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.

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This procedure works effectively, this is verified during the audit for non-conformities identified by staff, through complaints (2 checked in depths), 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 carcases are stamped with a mark NL-312-EG to release into food chain. CCP on tarnish.

Example checked: returned products from 9/11/22.

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 reports including mass balance (seen test 13/10/2022 backwards and 14/11/22 forwards) is carried out within 4 Hrs.

With a vertical audit list, during the audit traceability was tested on product “trimmings 70/30 BLK1*”. Alive pigs, received 31/8/2022 UBN , Slaughtered same day, deboning next day

Fast tracing (forwards/backwards), including packaging (cover top on reusable red crates) was possible in the records / with help of the software 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 (<4 hours). Rework is not applicable.

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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, all 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.

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 devided in complaints received from Vion sales and received from (another Dutch meat producer). All results are within KPI's.

complaints in 2021 (was in 2020, in 2019) of which a total on possible food safety issues and integrity complaints were received.

For 2022: complaints YTD of which related to food safety. .

In 2021- 2022, there is one on ongoing issue with authorities (see chapter 1): communication with NVWA about action plan and improvements is organised.

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.
Recall test was done 10/12/2021, the concept of the report of 25/11/2022 was seen

A new approach with LRQA is agreed: quarterly the Head office of Vion sent out an overview of all reported issues (incl. penalties) with the authorities (NVWA). The mail between LRQA and the HQ was dated 30/11/2021.

In 2021-2022, there was one on ongoing issue with authorities (see chapter 1).

Details of non-applicable clauses with justification

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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 (incl. Risk analysis 10051). Documented assessment Food Defense 25-11-2019.

The security arrangements are yearly reviewed as a part of the reassessment process (= HACCP verification, date see chapter 2). Documented assessment in P-APD-NL-10.201

There is a Central document P-FOOD-10.051.

Food defence and food fraud is also part of the internal audit process.

An update is planned for BRC 9.

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.

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

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.

1 Minor NC, see Non-Conformity Summary Sheet

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. Water quality is defined as a general control measure.

This has been tested 4 times a year for both microbiological (TPC 22 and enterococci) and chemical quality.

- The samples are analyzed by (RvA ISO 17025 accredited laboratory), last report seen 26/10/2022.
- Also ice is made and quarterly checked on TVC and Enterobacteriaceae (last COA from 20/10/2022).

Dry ice is also used as to cool the meat (frozen CO2, bought from an approved supplier).

A water distribution plan is available (5/7/2021).
The results of the monitoring plan are verified; all results were within the legislation standards.

1 Minor NC, see Non-Conformity Summary Sheet

4.6 Equipment

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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.

Equipment made of stainless steel (or plastic, e.g. conveyor belts, DOC's are kept, example seen for belts from supplier Intralox).

4.7 Maintenance

Maintenance is managed with system.

maintenance programme is also used for administrative purposes.
Several samples were checked this visit
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.

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 in .

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 compressors for the compressed air equipment (some do have food contact; filters at the point of use and replaced, yearly (and quarterly checked). The equipment is supervised by an external contractor and filter types and greasing is suitable and under verification.

Several records were checked in the audit of 2022 for air filter replacement, metal detector, X ray, calibration records.

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 (outside in a temporary room). Controlled facilities.

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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 natural ventilated area outside the building.

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. Limits: 4,0 - 6, 0 mm (ss, Fe, non Fe)
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 on F-APD-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 (risk based: 1 x / month for open product situations –and full inspection: 4 x / year). Records of breakage and corrective actions are listed and seen this audit (Oct, Nov 2022 for the monthly and October for the quarterly, seen records of inspections 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, only hard plastic red boxes

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).

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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. Limits: 7,0 mm ferro and non-ferro and 8,0 mm stainless steel.

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 (start/ stop/ hourly) by the packaging process of tongues (tongues can contain metal, caused by eating moments of the pig).

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 (, as well to monitor the fat content). Good control was observed. Checked with 7,0 mm Fe, Non Fe and 8,0 mm SS (start/ stop/ hourly).

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.

1 Minor NC, see Non-Conformity Summary Sheet

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, only in red hard plastic crates or big dolavs (with inliners).

Controls are in place for the coloured crates and the bigger ones (dolavs)

4.11 Housekeeping and hygiene

Cleaning mainly by external company according digital schedules (last update 14/9/2022) with frequencies and applied agents and procedures and cleaning schedules (digital system, connected with the app where Vion employees make records daily). Cleaning is done as common in the branch: dry

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cleaning, flushing, foaming, disinfection, flushing This is done on a daily base. Seen records of cleaning within the vertical audit.

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 are continuous trended (last 12 months) and verified. Incidental higher values, corrective actions are demonstrable, but overall good results.

Residue checks are done at a 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.

The right dosing of the chemicals is checked periodically

4.11.7 Cleaning in place (CIP)

CIP is not completely applicable: On the site, there is 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 (besides that Vion is filling plastic bags with organic blood out of this tank). The customer, . sent weekly the COA's of the lab results. Vion is doing daily visual checks, and takes residue test and agars (monthly)

4.11.8 Environmental monitoring

An 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 past year and this year YTD). Listeria (in cutting department) 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 RvA

Also, residue tests (to check left over of chloric disinfectant) are performed. On equipment, drains 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 and (Contracts are applicable). Cat 3. Leftovers are sold to the pet food industry.
Also blood and some organs are sold to the pharma industry.
This company is all qualified by NVWA for disposing these kinds of materials.

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4.13 Management of surplus food and products for animal feed

NA, there is no sale surplus food as animal feed destination. Cat 3. leftovers are sold to the pet food industry.

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.
Last visit report of 30/11/2022 was seen, no special issues.
Actions are taken and described in the action reports (only 5 open issues, **SEE NC**) . Once a year pest control survey is performed, verified report of 26/9/2022.
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.

1 Minor NC, see Non-Conformity Summary Sheet

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 . Stock rotation is controlled by the FIFO system.
External storage can be hired by BRC (or GFSI) certified companies. E.g. and

4.16 Dispatch and transport

Dispatch and release of products is based at the pre shipment 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 (Distrifresh) by transport audits.

Dispatch process is verified in the vertical test. CCP checks and pre shipment procedures

1 Minor NC, see Non-Conformity Summary Sheet

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Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.9.5	Wooden pallets are not permitted in production areas.
4.10.2	No filters and sieves.
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.
4.11.7	CIP is not completely applicable: the owner of the tank is client S. seen 4.11.7
4.13	NA, no sales of surplus food directly as animal feed

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.
There was no real product / process development.

The validation was seen for:

A new belly opening robot, 12/4/2022; slaughtering of organic pigs, 5/3/2022.

For packing of organic blood in plastic bags 10-20 litre, the validation (done as part of the one of 5/3/2022) was insufficient: **Minor NC.**

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.

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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 voedselfraude" (latest version 21/3/2022, P food 10049) for Food Fraud has been implanted (including planning for yearly review, reported in the yearly HACCP verification). 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).
Daily mass balances are made for IP products like BLK* and organic (checked during Vertical trace test)

The company is external audited 7,8 June 2022 (2 years cycle, depending on the result) 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

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All microbiological analyses are outsourced to a contracted ISO17025 recognised laboratory (RvA).
Shelf life tests are taken place, but this is coordinated by the central QA department in Boxtel. Records were seen as part of the vertical trace test 25/11/2021 for Trimmings.
Plan on sampling is described in F-APD-NL-10001. In the plan pathogen testing is 4x/y which is done in 2022.

Daily samples at carcasses (TVC, enterobacterial and salmonella) and weekly check at several pathogens (Salmonella and Listeria) and STEC 2 x per year. 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. 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 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 pre shipment 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 claims are made

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5.4.5	No claims related to allergens
5.6.2	No internal laboratory
5.8	No petfood production (cat 3 can be sold to pet food industry).

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.

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

Change control process:
The used procedures to control labelling and pack control are documented and are simplified after the introduction of the MES applications (software) 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, records were seen for 1/12/2022 (neck bones).
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.

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6.3 Quantity, weight, volume and number control

All products are sold and invoiced by nominal (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 system 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. Several records checked; no remarks.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
6.2.4	No on-line vision equipment used for labels

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. E.g. training records (Internal general training including CCP/ HACCP training, food defence and food fraud).

Training is given at leest once every year.

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

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

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 from : and and general training for: , and others.

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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.
1 Minor NC, see Non-Conformity Summary Sheet

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, records are kept and seen this audit.

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

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. Masks are worn in the factory and screens are placed when distance keeping is not possible.

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.

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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 knifes.

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

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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
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste/Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

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

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9 - Traded Products
9.1 Approval and performance monitoring of manufacturers/packers of traded food products
Not applicable
9.2 Specifications
Not applicable
9.3 Product inspection and laboratory testing
Not applicable
9.4 Product legality
Not applicable
9.5 Traceability
Not applicable

Module 11: Meat supply chain assurance	
Scope	Click or tap here to enter text.
11.1 Traceability	
Click or tap here to enter text.	
11.2 Approval of meat supply chain	
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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 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. 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		

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	(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: • Economic adulterants which affect food safety • Environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • Radiological hazards • Unintentional adulterants which affect food safety		

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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 and responsibility for the following: • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify recall is carried out		

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	• 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 BRCGS section 2.10.		
13.1.11	Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRCGS sections 2.11 and 3.7. 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).		
13.1.12	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. Validate allergen, sanitation and supply-chain controls as appropriate to the		

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	nature of the hazard, control and facility.		
13.1.13	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. 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.		
13.1.14	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: • Sampling procedure to include method, quantity, frequency, and number of samples • Analytical method • Laboratory conducting analysis • Corrective action procedure		

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	where pathogen is detected		
13.1.15	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: • 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	Devices used to verify preventive controls must be calibrated.		
13.1.17	Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training and qualification via job experience.		

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13.1.18	All records required by 21 CFR § 117 must include: • 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	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.		
13.1.20	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 must be retrievable within 24 hours with the exception of the food safety plan, which must remain onsite.		

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13.1.21	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. 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.		
13.1.22	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.		
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 at an adequate frequency.		
13.2.1	Human food by-products held for distribution as animal		

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	food must be held under conditions that will protect against contamination, including the following: - 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.		
13.3.1	A Qualified Individual (QI) is responsible for developing the site's food defense plan,		

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	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. One or more QI's shall be responsible for implementing mitigation strategies at actionable process steps.		
13.3.2	The site shall have a written food defense plan, which includes the following: • 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	A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates the following key criteria (at a minimum): • Scale and severity of		

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	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 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.		
13.3.4	Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment. Justification shall be documented explaining how the strategy significantly minimizes		

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	or prevents the vulnerability.		
13.3.5	Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies. Procedures shall include recordkeeping requirements for all monitoring activities.		
13.3.6	Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria: • Method for identifying and correcting a lack of implementation • Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions		
13.3.7	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		

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	describe activities to verify implementation of mitigation strategies. Verification procedures shall include: • 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	Reanalysis of the food defense plan shall be documented and performed every three years or whenever • A change in facility operations which creates a new significant vulnerability • Knowledge about a new threat		

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	applicable to the food or facility becomes known • Mitigation strategies are not implemented as intended • FDA requires reanalysis based on new threats or scientific evidence		
13.3.9	All records required by 21 CFR § 121 must include: • 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	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.		
13.3.11	All documents and records relating to the		

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	food defense plan (i.e., all records required by 21 CFR § 121) must be retained at the facility 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	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. 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.		
13.4.2	The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their		

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	responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver, it shall ensure compliance with the rule. 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.		
13.4.3	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. 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,		

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	which are appropriate for the type of food.		
13.4.4	Contracts with loaders shall specify that the loader is responsible for following sanitary 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	Contracts with carriers shall specify that the carrier is responsible for the following sanitary activities where agreed to in writing with shipper. • 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		

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	recording the previous cargo and most recent cleaning for the shipper		
13.4.7	Contracts with carriers shall specify that the carrier implements a training program for all personnel engaged in transportation activities, which covers • 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.		
13.4.9	The recordkeeping policy shall ensure all sanitary design requirements and cleaning procedures for vehicles are maintained onsite and all offsite		

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	records are retrievable within 24 hours.		
13.5.1	Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following: • Principles of food hygiene and food safety Produce safety standards applicable to an individual's job		
13.5.2	Personnel (permanent and temporary) who conduct harvest activities (including washing and cooling) must receive additional training on the following: • 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		

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13.5.3	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.		
13.5.4	A supervisor shall be identified with 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.		
13.5.6	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		

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	conditions, which could introduce known or foreseeable hazards into or onto produce. 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.		
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.		
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.		
13.5.9	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. Where water treatment is not performed, re-inspection of the entire affected agricultural water system shall be		

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	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.		
13.5.10	Agricultural water testing may be performed by the site (or site representative) or by a third party provided representative samples of the site's water source is secured. 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.		
13.5.11	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-		

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	change schedule for recirculated water. Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris). Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to minimize 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.		
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.		
13.5.14	Plumbing shall not allow backflow or cross-connection between waste and potable water lines.		
13.5.15	All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe after being made by the		

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	supervisor or responsible party.		
13.5.16	All produce safety documents and records must be retained at the site for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours. Records related to equipment or processes used by the site for analyses, sampling, or action plans—including the results of scientific studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued.		
13.5.17	Specific additional requirements for the harvesting, packing, and holding of sprouts. Establish and implement a written Environmental Monitoring plan for the testing of Listeria spp or Listeria monocytogenes. The environmental monitoring plan shall include the following criteria: • Target test (i.e., Listeria spp. or L. mono) • Sample frequency (no less monthly)		

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	• 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) The plan shall describe aseptic methods for 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	Specific additional requirements for the harvesting, packing, and holding of sprouts. The environmental monitoring plan shall include a corrective action plan if any samples are positive for Listeria spp. or L. mono. If Listeria spp. or L mono are identified in the harvesting, packing, holding area, the following activities shall occur as a part of		

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	the corrective action process: • 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 product testing as appropriate • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce		

14.1 Additional Specifier requirements

14.1 Traceability

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

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