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

1. Audit Summary			
Company name	VION Apeldoorn BV	Site code	1812048
Site name	VION Apeldoorn BV		
Scope of audit	The slaughtering of pigs, the deboning, cutting to specification and packing of fresh pork in bulk, boxes including bag or vacuum. The production and packing of slaughter fresh by-products and salted intestines in bulk and frozen pancreas in boxes including bag.		
Exclusions from scope	None		
Justification for exclusion	Non-applicable		
Audit start date	2025-02-03	Audit finish date	2025-02-05
Re-audit due date	2026-02-04	Head office	Yes

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

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit programme	Announced
Previous audit grade	AA		Previous audit date	2024-02-02	
Certificate issue date	Select a date		Certificate expiry date	Select a date	
Number of non-conformities			Fundamental	0	
			Critical	0	

2. Audit Results

	Major	0
	Minor	5

3. Company Details

Site address	Laan van Malkenschoten 77 7302 HD Apeldoorn		
Country	The Netherlands	Site telephone number	+31 (0)889952919
Commercial representative name		Email	
Technical representative name		Email	

4. Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	1-3

Shift pattern	1 shift per day production, five days a week	
Seasonal site	No	
Seasonal opening times (Start/end date)	Click or tap to enter a date.	Click or tap to enter a date.
Other certificates held	ISO9001, IFS-PIA, SKAL (organic), BLK, IKB, QS	
Outsourced processes	No	
Outsourced process description		

4. Company Profile	
Regions exported to	Europe Asia South America Oceania Africa Other
Company registration number	NL-312-EG
Major changes since last BRCGS audit	No changes

Company Description

Vion Apeldoorn BV is a slaughterhouse and industrial butcher for pork meat (old building built in) The company is part of the Vion Food Group (Vion Food Nederland) from 2006. The company is slaughtering in general pigs / week (pigs / hour) at one line.

The slaughtered pigs are all Dutch origin (born and bred). These are cut to specification for several customers. A vast amount of the pigs are slaughtered and cut to specification for another Dutch meat producers, who owns these pigs (BIO and MS meat star pigs).

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

Type of specialist equipment on site: slaughtering line (implemented information system in 2018 and belly opener robot in 2022); cooling of carcasses through spray system (2018); cutting lines (2017 investment); bowel processing line from 2018.

Vion Apeldoorn is producing bulk products (in bone, boneless, hanging products) and intestines and derived products of it. The middles are mainly selected for the bacon production at another Vion plant/Boxtel. The cutting department is cutting hams and shoulders to customer specification. No consumer products are made.

There are employees of which appr. agency workers, in production processes, facility, maintenance and staff departments. Covered site is m2. There is one HACCP plan.

Vion Apeldoorn is USDA approved and is allowed to export to several countries all-over the world using the EKS system of the Dutch Authority NVWA for approval.

EG registration is EG-312-NL. www.vionfoodgroup.com

The audit was undertaken fully on site as centrally managed elements were included within the audit process by review information at site as part of the site audit.

Centrally managed processes are: a) establishing strategy and mission; b) developing and maintenance of procedures for the main processes; c) create, review and update product specifications, customer specifications and packaging label specification; d) sales and customer contact; e) management of suppliers and approval (farms, non-food goods, services); f) generic HACCP assessment, Food Defence

4. Company Profile

and Food Fraud assessments. The HQ processes are integrated in the audit of the site Managing System.

Sales, QA, HR, Finance, Transport and Purchase processes are centrally organised by the HQ in Boxtel within Vion with onsite officers. Freezing can be used which is also organised by HQ

The audit start date is 3th February (due date 4th February) and the end date is 5th February so it ends within the 7 day automatic concession for late audit so not need a concession from the BRCGS.

5. Product Characteristics

Product categories	01 - Raw red meat Category 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), short shelf life; 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 and organs 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 Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen

5. Product Characteristics	
	Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	BIO (organic), BLK 1 star, IKB
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.) in dolavs, crates, vacuum, bag in boxes. Production of intestines (salted), packed in bulk.

6. Audit Duration Details			
Total audit duration	20 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	None		
Combined audits	None		
Next audit type selected	Announced		

Present at audit					
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)					
Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
	Plant Manager	x		x	x
	QA manager	x	x	x	x
	Asisstant Technical manager	x		x	x
	Bowel and slaughter department manager	x	x	x	x

	Technical manager	x		x	x
	VOS facilitator	x	x	x	x
	Cutting department manager	x	x		x
	Foreman dispatch		x	x	
	CCP monitor dispatch area		x		
	CCP monitor at slaughter department		x		
	Ante mortem inspector pigs receipt area		x		
	Animal Welfare Officer manager pigs receipt area		x	x	

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

Document control			
CB Report number	RQA9732308 / 6631464		
Template name	F908 Food Safety Audit Report Template		
Standard issue	9	*Template issue date*	2022-12-16
Directory allocation	Food	*Version*	1.1

Non-Conformity Summary Sheet

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

Critical		
Clause	Detail	Re-audit date

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

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
4.4.3	Not properly maintained drainage in two isolated cases with limited product contamination risk: Leak with wet spot on the floor from pipe leading dirty water from a hand washing sink located to a line in cutting/deboning department; Drops falling from a pipe carrying condensate from an evaporator onto a closed container with ice used as a cooling agent for products in Bowel department.	The leaks in question were reported in the maintenance system and repaired by the TD after production. Records of deviations have taken place on the checklist of the SSOP cutting and deboning dated 03-02-2025 and bowel department dated 04-02-2025.	We have started an improvement plan on water saving, of which reduction on 'waste/leakage of water' is part. Preventively, a monthly check will have to be carried out to ensure that the hand-washing facilities in all departments are working properly. Also, the working method for the bowel department will be adjusted so that no more stacking is allowed under the evaporator in question.	The cause of leakage at the handwashing facility is due to no preventive maintenance on the drains. The cause of leakage at the evaporator outlet is due to incorrect working method of stacking dolavs, for which there is too little space and which consequently damages the outlet pipe.	2025-02-21	CA accepted and NC closed if proposed preventative action will be implemented.

Minor						
4.7.4	Available excess amount of grease for lubricating a moving element of a conveyor belt over a crate with trimmings (open product) was observed during one of the site tours (first week working day) in cutting/deboning department. Lubrication is carried out over the weekend with an approved grease for incidental food contact NSF H1.	Excess grease was removed immediately. Product was not contaminated. Awareness of physical contamination hazard among relevant managers made clear and that this deviation should not occur when production is in progress and if observed to pick it up as a deviation, correct it. Registration deviation have taken place on the checklist SSOP Asia dated 03-02-2025.	Weekend lubrication crew has received re-instruction from TD department manager to follow procedure for delivery after lubrication and remove excess grease if there is any to prevent possible contamination. Pre-ssop inspectors have been instructed to be extra vigilant on this after the weekend and rectify and registration of deviation where necessary before production. Verification of the effectiveness will take place in week 7 by QA.	Weekend lubrication crew has not followed procedure.	2025-02-21	CA accepted and NC closed if proposed preventative action will be implemented.

Minor						
4.9.6.3	Isolated observations for not proper handling of packaging materials in cutting/deboning department: a) plastic crates (two out of hundreds) with breaks with hanging pieces not disposed and used for open product; b) a piece of label available on a packing table for ribs, remote from the label printing location. Control measures for handling such materials to avoid product physical contamination are in place.	The crates in question were immediately removed from production and replaced with an acceptable crate. The tarnished label is immediately removed from the table. Records of deviations have taken place on the checklist of the SSOP Cutting and deboning and Asia dated 03-02-2025.	Incoming inspection for packaging material crates is weighted for the coming period. Crate suppliers have been informed to carry out final inspection in accordance with the crate guideline after the washing process. Damaged crates should be better selected out in this process. Labels must be properly attached to pin hooks so that they do not come off unintentionally. During the verification of the SSOP, additional supervision of the process of applying labels. Verification of the effectiveness will take place in week 8 by QA.	Crates were not observed during the entry check and subsequently not selected when entering the crate line. It is expected that the label of the pin hook for hanging has fallen off and ended up on the belt without us being aware of it.	2025-02-21	CA accepted and NC closed if proposed preventative action will be implemented.

Minor						
4.11.2	A spot with old dirt on the control panel of the machine for mixing of trimmings was noted. Isolated observation. Cleaning procedures are in place with maintained appropriate standard of hygiene in all visited departments during the site tours.	The rear of the terminal was immediately cleaned. Records of deviations have taken place on the checklist of the SSOP Asia dated 03-02-2025.	Re-instruction of the pre-ssop inspectors to check the terminals for cleanliness without the protective bag. Verification of the effectiveness will take place in week 7 by QA.	The relevant terminals in this department are cleaned after production and provided with a clean plastic bag to prevent water damage. During the daily pre-ssop check and during production, this deviation was not observed, because the inspector had not removed the bag and therefore did not check the terminal correctly.	2025-02-21	CA accepted and NC closed if proposed preventative action will be implemented.

Minor						
7.2.1	Improper wearing of snoods for beards and mustaches (not fully contains hair) by more than one operator in cutting/deboning department was observed during the site tour. The mentioned personal hygiene requirement is documented, communicated and checked routinely.	Employees immediately corrected to wear the beard net correctly. Records of deviations have taken place on the checklist of the SSOP cutting and deboning dated 03-02-2025.	In order to better guarantee the correct carrying, extra supervision will be carried out on the lines, to make the employees aware of this, so that the wearing is standardized. The TV screens will again show the instruction on how to wear the beard net correctly. Verification of the effectiveness will take place in week 8 by QA.	The face mask that we have worn in recent years has recently ceased to be necessary, making it possible to wear a beard net correctly again. The implementation of this was not yet 100% good and needs even more decisiveness of supervision.	2025-02-21	CA accepted and NC closed if proposed preventative action will be implemented.

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

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

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

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

Audit team

Lead auditor		
Auditor number	**First name**	**Second name**
32128	Mariela	Dimitrova

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
			Lead Auditor	2025-02-03	08:30	17:00	physical	
			Lead Auditor	2025-02-04	07:30	16:30	physical	
			Lead Auditor	2025-02-05	07:30	11:00	physical	

1. Senior management commitment

Policy and Objectives
There is a documented Vion HQ and Vion Apeldoorn Food safety, Food Defence and Food Fraud policy which is confirmed and communicated by the senior management P-APD-NL-10.001 signed by the plant manager date 06.05.2024.
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 details last conducted on 21.01.2025). 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 for 2024-2025 (yearly overall Management Review from June last year till July next year).
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 2024 are reached because of projects are placed on hold.
Examples of targets for 2025: optimization of processes and financial results, technical solutions to minimize condensation in areas, example: processing and cooling of liver; maintaining product integrity with KPI for animal welfare, food safety (compliance to specifications), employment and working conditions, traceability, safety culture. KPIs' are set and monitored, not all below the limits.

The company has introduced and implemented a plan for the development and continuing improvement of a food safety & quality culture within the VOS (Vion Operating System) methodology: 2024/2025. 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 shop floor is part of this plan. Culture is an important 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.
Meeting Program: Communication is also linked to the VOS system: 5x/day team huddles, daily Tier1 meetings, weekly Tier2 meetings (trends, management team level), monthly Tier3 meetings (including monitoring progress realisation objectives). Selected for review the meetings held in the last month.

Issues (19) observed with the Dutch NVWA about (main three reasons): condensation in cooling cellars; animal welfare; carcass contamination of intestinal contents (not outside of critical limit). Action plans are demonstrably implemented with clear root cause-based preventive actions in place (confirmed during the visit).
Vion reports all fines as soon as possible, following the agreements between LRQA and Vion. This means, in the case that Vion must pay the NVWA for issues (reports for penalties), LRQA is informed as soon as possible by the head office.
All inspection and audit reports are quarterly published: 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. Site has a up to date list of all relevant legislation (NL-312-EG).

The Senior Management attended the opening and closing meetings and provides enough resources for implementation and development of the FSMS.

Outstanding NC points from the previous BRC audit in 2024 were checked and no reoccurrence was seen:

2.7.1 Minor NC: Process step brining of intestines was not in-depth taken up in the process flow. Not demonstrable which risks were to be managed. Brine container dirty, black spots observed. Salt concentration is measured with a Baumé meter without correct instructions. CA's verification: HACCP process flow is updated. Established and implemented weekly schedule of cleaning of mentioned container, subject of visual check with the pre-SSOP and verified with the contact agar samples. Used updated work instruction for the use of the Baumé meter. Finding is closed.;
4.4.8 Minor NC: In the white offal processing room was observed flaking paint on the door post and the door of cooling cell not in good condition. Also observed flaking motor above the open dolav with spleens (not food but Cat3). CA's verification: All mentioned was checked without such observations. The places are replaced by a noncorrosive material to prevent flaking paint as part of done investment. Finding is closed.
4.7.6 Minor NC: Area outside at maintenance workshop was not in good condition and debris is accumulating with contracting leftovers. CA's verification: Mentioned was checked without such observations. Every two weeks implemented cleaning of area with leftovers put in the correct container immediately disposed when full by the contractor. Finding is closed.
4.9.3.3 Minor NC: Glass breakage recorded however not demonstrable. CA's verification: Baumé meter in the correct size is available, so the employees don't have to take the Baumé meter when they measure the brine. The employees training on job how to correctly use the Baumé meter in the plastic case and about the glass breakage procedure was provided. Correct implementation is verified during the SSOP verification. Finding is closed.
4.11.2 Minor NC: Hand dry equipment (two blowers) on slaughtering entrance not kept in good condition as the inside water holding parts were dirty with mould and dirt. Correct cleaning not demonstrable. CA's verification: mentioned fact was checked without such observations. Implemented daily 3 times cleaning of hand dryer (inside and outside) by the facility department and every evening by the external cleaning company. Every 3 months during the verification with the external cleaning, the inside cleaning of the hand dryer is verified. Finding is closed.

BRC logo is not used, reference to certification status is accordance with conditions of use.
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 dated 19.12.2024 has been sent by mail before to the audit.
In the chart all levels are defined for the departments. Site management team included. 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 / substitute or deputies assigned). All staff are aware of their responsibilities and have access to relevant procedures. Feedback from personnel on factory floor demonstrates that staff is aware when, how, and to who report food safety issues to.

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

2. The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles. The HACCP system is implemented and maintained. At VION Food NL corporate level a thorough HACCP analysis (P-VION-10.000 date 25.11.2024) is made and available for the sites.
The local process control plan (P-APD-NL-10011 ver.6; layout date 19.04.2024; P-APD-NL-10.022 date 19.12.2024; P-APD-NL-10.023 CCP's/CP's ver.20 date 03.09.2024) authorised by the plant manager) was developed by the multi-disciplinary HACCP team.
The HACCP system has full management commitment and it 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 and QA team (2 officers).
The local Management Team 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 members are trained in HACCP.
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 considering the severity of the hazard and the likelihood of the hazard affecting finished product.
Actual examples (ver.09/21.10.2021) 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); (rarely used)
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 used)
CCP 8: Temperature of animal by-products (not anymore for salted testiness) at dispatch (≤ 3.0 ºC).
CCP 9: Contamination of stomach (intestinal contents); not noticed contamination tolerances.
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), intestinal processing (cleaning, cooling, salting), dispatch.
Flow diagrams are documented and actual (as part of the verification report, seen that date for onsite process flow verification date 01.11.2024). 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 requirements for meat and corporate engagements. Clear description of the key elements of the CCP's, OPRP's and PRPs. Critical limits re-assessment study rev.11/26.11.2024.
Validation of each CCP has been performed in the past, no updates needed since the last audit. 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: "re-assessment") is integrated in the yearly management review report (seen last year report July 2023 – June 2024), date 11.07.2024. The HACCP- plan including all CCP's with critical limits has been verified. No special issues have been noticed by the team.
The procedures for each CCP identify the corrective action to be taken when the limits are exceeded. Records are kept of adjustments made and any actions taken.

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

3. Food safety and quality management system

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

Food safety and quality manual

) is used as Quality Management System for the documentation related to the food safety and quality manual for all sites in the Netherlands and Germany. This is managed by the central Vion QA department. The site has its own area within the system for local procedures and work instructions. All members of the local MT, team leaders and employees QA have access to . 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. Most working documents are also available in other languages. General in English, but some instructions can be with department specific work instructions available on the network and accessible using workstations available on-site. Documents are available up to 7 languages. Also, on-the-job training is available supporting working instructions and procedures as part of the management system.

Documentation is up to date. Forms are available in , seen in Dutch.
Document control: documents seen during the audit were complying. Changes are collected in

Record completion and maintenance

Records are in good condition and retrievable electronic/on site. Records retained based on best before date plus 1 years as a minimum as common in the food industry.
List of controlled documents is available and stored securely and is backed up (external kept).
There are also documents in use from other sources as maintenance and operation/VOS, no relation with the food safety aspects.
A tablet with an app is in use for most records, incl. CCP's ( ).

3.4 Internal audits

Reference procedure: P-NLFood-10.030 internal audits
Internal audits are performed by internal auditors who are the QA managers from other sites. They 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. So internal auditor cross functional is arranged well
Records checked this visit: announced 21.03.2024 and 28.06.2024, unannounced 30.08.2024 and 10.12.2024 (20 minors and 1 major noted).
All chapters of the system are audited with the related implementation in production, which is done risk based. 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. 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 maintenance) 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. 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 management of suppliers is a corporate/HQ responsibility within the Vion Group.
Purchasing processes of raw materials (ingredients) and packaging materials are managed by the HQ via approval procedures (incl. GFSI / chain certification status and questionnaires) and contracts: List of approved suppliers S-MMI-10011.
The audited plant is only authorised to order products or services from approved suppliers according Procedure supplier's audit (P-FOOD-10023), Procedure food supplier assessment (P-FOOD-10025) and Procedure requirements products and services (P-FOOD-10026).
Vion Farming takes care for the suppliers of livestock (pigs) from the farms. Process is documented in P-NL-Food 10157 and verified. Integrity / canalisation is verified also during the assessment on site on types of quality lines and based at e.g. IKB certification (P-FMG-NL-10039 ver.15/29.11.2024 – pig farms approved list).
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 (e.g. salt related to food). So, no high-risk suppliers are decided. Control of administrative documents related to the delivery of livestock. (IKB/UBN nr, origin). Also check at animal welfare aspects
There's an audit plan for external suppliers, based on risk management.
There's a yearly assessment of suppliers, the site is asked for input. No serious high-risk suppliers are identified. Overview is seen in digital application: input from current site about approved suppliers of pigs, additives, packaging materials and services. Suppliers of primary packing material must be BRC Packaging or IFS Pack certified.
Services including cold storages supplier evaluation performed by a supplier audits by a HQ auditor.
Supplier assessment is a continuous ongoing process. All suppliers are evaluated yearly, parameters are e.g. certification status and quality of deliveries (e.g. illnesses).
VION reviews the performance of these transport companies by audits (sampled Vion Farming audit report dated 27.11.2024, action plan agreed in process).
Agents and brokers can be used the supplier is known then.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

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

Incoming pigs are controlled by procedure P-APD-NL-10031 rev.43/21.11.2024
Incoming packaging products are controlled at quantity, traceability and quality aspects. Records of delivery seen during the audit and in the vertical test, for details see that chapter, no remarks. All packaging taken up in the system.

3.5.3 Management of suppliers of services

The plant is reporting complaints on services and gives input for the assessment at a yearly base.
Relevant evaluations of some packaging and service suppliers related to Vion Apeldoorn, e.g. (Pest control), (cleaning), (clothing washing) and (hiring agencies).

3.5.4 Management of Outsourced processing

No outsourced processes under scope.

3.6 Specifications

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

During the audit, several specifications were reviewed and seen to be clear and accurate.

- Raw material: live pigs (P-APD-NL-10174, ver.9, 07.03.2023);
- Finished product: fresh meat 0 to 5th cut; Slaughter by-products of intestinal pakage (P-APD-NL-10174, ver.9, 07.03.2023);
- Finished product: Pork trimmings 80 : 20 (GF/IKB) – ver.02/13.12.2019;
- Packaging: plastic bag (blue) , producer product data sheet 01.09.2023 and Declaration of compliance date 01.09.2023;
- Cleaning agent:
- Lubricant: (NSF certificate H1 class approved)

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 the database and are part of an online specification system.
For technical specifications software application 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 (Management Team).

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 every three years.

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.
This procedure works effectively, this is verified during the audit for non-conformities identified by staff, through complaints including from authorities, internal audits, third party audits etc.
Sampled complaints a) observed with the Dutch NVWA about (main three reasons): condensation in cooling cellars (actions: technical measures for insulation); animal welfare (actions: reconstruction of the area, training); carcass contamination of intestinal contents (no outside critical limit) (actions: training); b) complaints for physical contamination of the product (blue plastic Oct 2025/ metal particle Sept 2025 (actions: training of responsible staff).
Corrective actions and preventive action system is up to date. The handling of these non-conformities is according to 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 responsible 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.

3.9 Traceability

Traceability system is documented and implemented.
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 is one test per year. Last reports including mass balance (seen tests BIO products date 16.04.2024; GF product date 16.05.2024; pancreas date 18.02.2024) backwards and forwards) is carried out within 4 Hrs.

With a vertical audit list, during the audit traceability was tested product Mager fresh (trimmings) 80:20 GF (IKB) lot , packed in dolav HB + bag + cover, slaughter day 16.01.2025, production date 17.01.2025, use by day 22.01.2025, 736,5 kg, client Vion R.
Evidence seen: delivery documents for customer nr. and order nr. ; CCP record on expedition ramp (temperature 5 measurements); truck inspection ( ); CP's records per departments (SSOP daily lists) e.g. Expedition on 17.01.2025; Slaughterhouse (clean area on 16.01.2025 including CCP records (every hour 25 carcasses); Animal welfare records and data (WSOP system); X-ray detection – every hour tests (NFe, Fe, RVS) and before and end of the process, temperature control, fat % control. Cleaning records (on 15.01.2025; Pigs trace to whole batch (receipt control on 16.01.2025) NL-01-16 GF-Vion 186 pigs Quality line GF ( ) and Slaughter Information System => farms UBN's and documents (e.g. ,); plastic bag receipt date 19.11.2024 (pcs) lot , used in period 12.11.2024 till 31.01.2025 – GFSI certified producer

Fast tracing (forwards/backwards), including packaging was possible in the records / with help of the software system.
Seen product specifications of 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.
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 (99,83 for trial lot). 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 divided in complaints received from Vion sales and received from (another Dutch meat producers). All results are within KPI's.
Reviewed complaints for Q4 2024, sampled integrity complaints (labelling, identification) 5 and product safety complaints (abscess, foreign bodies, shelf life) 3; Complaints (19) observed with the Dutch NVWA about (main three reasons): condensation in cooling cellars; animal welfare; carcass contamination of intestinal contents (no outside critical limit). Action plans are demonstrably implemented with clear root cause-based preventive actions in place (confirmed during the visit). One open complaint from Dec.2024.

3.11 Management of incidents, product withdrawal and product recall

Reference procedure: P-VION-10.015 ver.14/ 25.10.2024 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 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 date 03.12.2024.
An 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).

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
3.5.4	Management of outsourced processing

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

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 (= HACCP verification, date see chapter 2) and MR. Documented assessment in P-APD-NL-10201 ver.01 date 25-11-2019. There is a Central P-FOOD-10051 procedure.
The Management Team completing threat assessments and food defence plan has the appropriate knowledge**.** There is no legal requirement for specific training.

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

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 ver.10 dated 21.07.2023..
A clearly described zoning by colour for the plant is introduced. The plant has eight 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 who also have their own separate canteen and staff facilities. If canteen food is transported to these canteens, dedicated red plastic crates with lids are in use. Premises are suitable for the intended purpose.

Process flow is straight forward and agreed with the Dutch Food Authority (NVWA).
Premises allows sufficient working space and capacity to work in a proper way.
There were no temporary constructions noticed during this audit.

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

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 (faience coating), ceilings and floors (cement and polymer flooring) 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 generally 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.
Adequate ventilation and extraction assisted by operator drying in some areas in product storage and processing environment to prevent condensation was observed during the visit.
Stunning process with CO2 equipment. Process of unloading pigs, floating of pigs into stable and towards the process is suitable organized with visible attention for animal welfare aspects.

4.4.3 Minor NC: Not properly maintained drainage in two isolated cases with limited product contamination risk: Leak with wet spot on the floor from pipe leading dirty water from a hand washing sink located to a line in cutting/deboning department; Drops falling from a pipe carrying condensate from an evaporator onto a closed container with ice used as a cooling agent for products in Bowel department.

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 with defined sampling points.

This has been tested 4 times a year for both microbiological (TPC 22 and enterococci) and chemical quality. The samples are analyzed by ISO 17025 accredited laboratory). Also ice is made and quarterly checked on TVC and Enterobacteriaceae.
Dry ice is also used as to cool the meat (frozen CO2, bought from an approved supplier).

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

No gases are used in packaging. No compressed air in direct product contact is used.

4.6 Equipment

Equipment installed is suitable and designed for the intended purpose and used to minimise potential contamination.
Equipment is specified, tested and commissioned before commercial use, use of well-known brands of equipment for food applications.
Equipment which is in direct contact with food is suitable for food contact and meets legal requirements.
Equipment made of stainless steel (or plastic, e.g. conveyor belts, DOCs are kept, example seen for belts from supplier).
New equipment procedure is included in the validation procedure. Mobile, static, battery charging equipment not in open product areas.

4.7 Maintenance

Maintenance is managed with system. maintenance programme is also used for administrative purposes. Several contracted works were checked this visit, e.g. on pressed air and on cooling equipment.
The actual list of work orders (jobs) 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 maintenances 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 .
To reduce the contamination with lubricant a 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 (do not 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 e.g. air filter replacement, metal detector, X ray, calibration records.

4.7.4 Minor NC: Available excess amount of grease for lubricating a moving element of a conveyor belt over a crate with trimmings (open product) was observed during one of the site tours (first week working day) in cutting/deboning department. Lubrication is carried out over the weekend with an approved grease for incidental food contact NSF H1.

4.8 Staff facilities

There were suitable changing rooms on several locations on the site. 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.

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 containers 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 of the slaughter by-products department is not any more use for tongues, based on re-assessment of the pig husbandry practices, and limited potential for contamination with metal parts which can be found in tongues.

The metal detector can be used in cutting/ deboning department if there is a client demand. Limits: Fe 4,0 mm; NFe 5,0 mm and RVS (SS) 6,0 mm.

X-ray detection is applied to the produced meat trimmings. Limits: Fe 7,0 mm; NFe 7,0 mm and RVS (SS) 8,0 mm.

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. Counting is on entry and leaving per department per team leader. Seen counting at the end of audit day 1 in the knife sharpening area.

Records of knife counting seen in the vertical test on F-APD-NL-10161

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

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 verified.

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 and tablets usage and breakage dangers are controlled (verified during audit on production floor). Blue pens are issued per person.

4.9.6.3 Minor NC: Isolated observations for not proper handling of packaging materials in cutting/deboning department: a) plastic crates (two out of hundreds) with breaks with hanging pieces not disposed and used for open product; b) a piece of label available on a packing table for ribs, remote from the label printing location. Control measures for handling such materials to avoid product physical contamination are in place.

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 trimmings.
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 (Foss, as well to monitor the fat content of mixed trimmings). Good control was observed. Checked with 7,0 mm Fe, Non-Fe and 8,0 mm SS (start/ stop/ hourly). The X ray detector performance checked during audit on the trimmings production line.

Validation is done and included in pre SSOP, SSOP and glass register. Machines are included in the program of preventive maintenance and verified yearly by external contractor (X-ray performance check on 08.09.2024; Metal detector performance check on 15.10.2024).

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). Cleaning by a service provider. Controls are in place for the coloured crates and the bigger ones (dolavs)

4.10.7 Other foreign-body detection and removal equipment

No other foreign-body detection and removal equipment

4.11 Housekeeping and hygiene

Cleaning mainly by external company according to digital schedules (last update 14/9/2022) with frequencies and applied agents, procedures, schedules (digital system, connected with the app where Vion employees make records daily). Cleaning is done as common in the branch: dry 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.
Some cleaning (knifes, gloves, etc) is by own workers and clear instructions observed. knife washer with disinfection step at the end >80 °C.

4.11.2 Minor NC: A spot with old dirt on the control panel of the machine for mixing of trimmings was noted. Isolated observation. Cleaning procedures are in place with maintained appropriate standard of hygiene in all visited departments during the site tours.

4.11.7 Cleaning in place (CIP)

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. 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 .
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 and waste disposal

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 (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.
There is no trademark waste.

4.13 Management of surplus food and products for animal feed

There is sale of surplus food as animal feed destination for chicken via , cat 3 material is also sold to the pet food industry. Strict veterinary rules apply.

4.14 Pest management

The company has a contract with an external pest control service provider . Contract of is available 8 times a year and an in-dept inspection with scope: mice, crawling and flying insects.
Site map is available including baits and traps, insecticidal lamps.
All visit reports in the online application, e.g. visit report of 25.01.2025 was seen, no special issues.
Actions are taken and described in the action reports. Once a year pest control survey is performed, report date recorded 25.11.2024.
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.
Pest signage training is part of the general training.

4.15 Storage facilities

Good storage of packaging, ingredient (Salt, Sodium bisulphite, Dried ice) 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. No outside storage of packing material. Temporary outside storage of bags with salt during the visit, protected bags with check before being brought into the processing area (Bowel department).
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 system. Stock rotation is controlled by the FIFO system.
No off site external storage.

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 in bulk is loaded in covered bags, dolavs. Only use of approved transport companies. All transport is subcontracted following the central arranged procedure. VION Food (central office) is contract owner. The content of the contract complies with the requirements. VION reviews the performance of these transport companies by transport audits (sampled list of GFSI certified logistic companies S-MMI-10013/2024).
Dispatch process is verified in the vertical test. CCP checks and pre shipment procedures.

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

4.3.6	No temporary structures, building work or refurbishment.
4.5.3	No air and gases used as ingredients. No compressed air in direct contact with the product.
4.6.4	No mobile static equipment
4.6.7	No battery-charging equipment is used
4.9.4	No use of glass or other brittle containers as packaging material, only hard plastic red boxes.
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. sorting equipment
4.10.5	No optical sorting equipment is in use.
4.10.6	No products packed into glass/brittle containers, only in red hard plastic crates or big dolavs (with inliners).Cleaning by a service provider.
4.10.7	No other foreign-body detection and removal equipment
4.12.4	No trademark waste.
4.13.1	No surplus customer branded products
4.13.2	No customer-branded products sold to staff

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 or processes.
There was no real product / process development.
Last validations reported regarding: Bulk packaging and shelf life of organic blood for human consumption and cat.3 dated 17.04.2023. Fresh Trimmings shelf life verification 1x year through testing in an accredited laboratory – seen 12.12.2024 report ‘0” and “6” day. Temperature of chilled carcasses trial in period 05.06/08.06.2024 with data logger – 20 h to 7 cels.degr.

5.2 Product labelling

Vion Apeldoorn BV is producing single meat products. Labelling aspects are production date and land of origin. Labelling according to legal aspects as required by the company, several checks done during production tour.
Raw materials are special labelled and ready to ship product are provided with a crate/dolav 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

The only allergen available and used is sodium bisulphite added to mucosa to prevent spoilage in Bowel department.
Effective measures against cross-contamination are in place by placing the allergen in a closed system, in a separate room in department.
No other allergens identified onsite in production areas.
Allergens in canteens correctly addressed and hygiene rules in place to prevent cross contamination.
No claims on allergens.
The risk assessment covers all potential sources, including cross contamination and measures implemented.
Induction training includes allergens.

5.4 Product authenticity, claims and chain of custody

A central Vion procedure is a vulnerability assessment (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).

For pigs the company has several product integrity lines (BIO, BLK, IKB) 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 date: 22.06.2024, validity till 01.01.2026).

Daily mass balances are made for IP products like BIO, BLK, IKB (checked during Vertical trace test)
The company is external audited 7,8 June 2022 (2-year 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.

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, 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, on-site product testing and laboratory analysis

Plan on sampling F-APD-NL-10.001 rev.23/30.12.2024 – last update.
All microbiological analyses are outsourced to a contracted ISO17025 recognised laboratory ( ). Shelf-life tests take place, but this is coordinated by the central QA department in Boxtel. Records were seen as part of the vertical trace test. Plan on sampling pathogen testing is 4x/y which is done in 2024.
Daily samples at carcasses (TVC, enterobacteriacea and salmonella) and weekly check at several pathogens (Salmonella and Listeria) and STEC 2x per year. Reports of result in Quality Trend.
Some incidental salmonella findings over the KPI of 5% - sampled case dated 07.10.2024, root cause documented with implemented measures (add swabs, cleaning and disinfection of equipment and preventative plan applied.
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 (once per year) for heavy metals, OXTA, PFAS, PCB's, sulphonamide – lab report dated 17.01.2025.
The company has a full updated product sampling and assurance program available to verify that products are in accordance with specifications and legal requirements. In specification absence of pathogens is not taken up.
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 is present on the site. The agar analysis on contact surfaces is done by the plant itself in a stove in the offices of the QA department, also in calibration overview.
Verified several analyses performed throughout the year.
Shelf-life testing is applicable on site and 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 (e.g. QA manager) are allowed to release non-conforming products.

5.8 Pet food and animal feed

The site does not produce animal feed or pet food..

5.9 Animal primary conversion

All pigs are bought by sister company VION Farming and they have contracts with farmers, traders, transporters and pig owners regarding prohibited substances (tis is considered in testing procedures also).
A comprehensive supplier evaluation and approval program is in place and at site the porter checks for all deliveries the IKB status of each UBN (farm). The status of the organic pigs is checked by the night shift in the stables as these pigs are unloaded in the night and veterinary control is in the morning.
Inspections are demonstrably by legal authority competent individuals at lairage and post-mortem.
Traceability is ensured based on implemented systems: (slaughterhouse) and (deboning/ dispatch system).
Validated defined limits for all post-slaughter processes were proofed.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.2.3	Label information is not the responsibility of a customer
5.2.4	No cooking instructions are provided
5.3.5	No rework and reworking operations
5.3.6	Warning for cross-contamination with allergens not need according to risk assessment
5.3.7	No food allergy claims are made
5.3.8	No need of validation of equipment cleaning procedures to remove or reduce cross-contact allergens
5.4.5	No claims related to allergens
5.6.5	No internal laboratory on site
5.6.7	No internal laboratory on site
5.8	No pet food 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 P-APD-NL-10006 ver.6, date 11.10.2024 (PLC system). 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 start-up of the process in the morning is controlled via pre-SSOP systematic (cleaning, sterilizers, glass, maintenance checks).
By-products from production process otside of the scope of certification are controlled.
Correctly organized; corrective actions are done and reported in case of deviations.

6.2 Labelling and pack control

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. Labels are created from IT system and MDM system with 4 eye principles.

For the China product the 1st and last used label of a batch is glued on a recording form to control the use of the right label.
No label change over seen, this because all products that were packed for 1 customer only with different delivery locations.
Seen labelling of pallet and verification in the MES system at the expedition department.
Process and registrations are verified in the vertical test.

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 daily.

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. CCP thermometers are calibrated by QA department, all others subcontracted. Seen calibration report of X-ray on 08.09.2024; Metal detector on 15.10.2024. Seen 19 thermometers calibrated by QC officer on 08.01.2025 with reference thermometer.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
6.2.4	No on-line vision equipment used for labels
6.3.3	No on-line check weighers.

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 (incl. allergens), 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 least 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 using questionnaires; new workers should have a result of 80%.
Refresher training is organised at a regular base.
Seen CCPs training for randomly selected employee (and others date 08.01.2025.
Employees taking care for CCP controls, are demonstrable two-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. Checked training dates and evidence for recorded training: SSOP date 29.04.2025.

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 company film (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-10141, 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.

7.2.1 Minor NC: Improper wearing of snoods for beards and mustaches (not fully contains hair) by more than one operator in cutting/deboning department was observed during the site tour. The mentioned personal hygiene requirement is documented, communicated and checked routinely.

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.
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 workers and visitors) are wearing protective clothing (inclusive work shoes).

Protective clothing includes white or blue trousers, jackets and rubber boots / shoes.
Disposable hairnets are applied all hair is enclosed. Disposable gloves are worn where necessary.
Protective clothing is removed when the employee is leaving the production areas.
Operators know the house rules very well on gloves. Good adherence to the dress code observed during the site evaluation.
The external laundry ( ) complies with the requirements of the Global Standard for Food Safety. This is a low-risk operation. There are sufficient facilities to clean shoe soles, gloves and knifes.

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

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

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

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

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

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

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

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