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

1. Audit Summary			
Company name	VION Groenlo BV	Site code	2074194
Site name	VION Groenlo BV		
Scope of audit	The slaughtering of pigs, the deboning and cutting to specification and packing in bulk, bag in box, vacuum packaging of pork		
Exclusions from scope	None		
Justification for exclusion	na		
Audit start date	2023-02-27	Audit finish date	2023-03-01
Re-audit due date	2024-04-22	Head office	Yes

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

2. Audit Results					
Audit result	Certificated	Audit grade	A+	Audit programme	Unannounced – mandatory 1 in 3 years
Previous audit grade	AA		Previous audit date	2022-04-06	
Certificate issue date	2023-04-04		Certificate expiry date	2024-06-03	
Number of non-conformities			Fundamental	0	
			Critical	0	

2. Audit Results

	Major	0
	Minor	8

3. Company Details

Site address	Den Sliem 8 7141JH Groenlo		
Country	The Netherlands	Site telephone number	+31 544 476100
Commercial representative name		Email	
Technical representative name		Email	

4. Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	501-1500	No. of HACCP plans	1-3

Shift pattern	Day shift	
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, BLK	
Outsourced processes	No	
Outsourced process description	na	

4. Company Profile

Regions exported to	Europe Asia North America South America Oceania Africa
Company registration number	EG367NL
Major changes since last BRCGS audit	New QA manager (again). New porters gate house on enlarged plot size. Reallocated offices, building activities for the new stables coming years..

Company Description

VION Groenlo B.V. is part of VION Food Group. In the Netherlands they own 3 pig slaughtering houses who together slaughter more then pigs annual. The location slaughters pigs and sows (appr. per week, and subsequent deboning and cutting to specification. Sows are sold as carcasses, all pig carcasses are divided and cut to specification for B2B customers. Most of meat (80%) stays in The Netherlands but can be sold all over the world.
Pigs are bought by another VION subsidiary who is in close contact with the farmers, who have contracts with VION. Pigs are also bought on the free market. All pigs come always directly from the farm. There are several quality lines in the breeding of the pigs: EKO for which a SKAL certificate is in place (only currently EKO sows are slaughtered), FSA for which a global gap approval number is acquired, BL** and BL* and IKB. VION has on top other quality lines and separation methods on behalf of customers and on behalf of third countries legislation by an EKS procedure. EKS is the procedure on demands of Asian, American and other counties for which meat is to be certified by Dutch Authority NVWA for export approval.

The company has one HACCP study which is part of a central HQ VION study (HQ is located in Boxtel, NL). Centrally organized processes are QA, HR, Finance, Purchase, Sales, Logistics and IT. The location has about employees working in a dayshift operation, of VION and some are agency workers. The production volume is ca. pigs (including sows)/week. The original building dates from 2002 and is extended several times with a new cutting department and expedition area in 2016 and the crate facility building improved in 2020. The current total site is about 23.000 m2 including a pigs trailers washing house, parking for trucks, personnel parking lots.
Meat is sold hanging on hooks/brackets and dividers, is packed in cartons with pe foil /can be vacuum or crates or big boxes (dolavs) with or without PE foil. The audit was an unannounced audit and challenging because of also audit of authorities in the same time (which was announced).

5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category Category Category

5. Product Characteristics

	Category Category
Finished product safety rationale	Fresh pork meat (bulk, carcasses and cut to specification): further processing required, chilled (max. 7 °C fresh products, 6 °C vacuum packed products, max 3 °C for organs). Short shelf life, if to be frozen, not on this premises.

High care	No	High risk	No	Ambient high care	No

Justification for area	Product undergoes full cooking prior to consumption
Allergens handled on site	Milk 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 Choose an allergen
Product claims made e.g. IP, organic	Organic, FSA, BL**, BL*, IKB
Product recalls in last 12 months	No
Products in production at the time of the audit	Pigs in slaughtering house, pork in dividing department, short ribs in packing department, FSA line in cutting department, 70/30 mm in mixing department.

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	Expected is 26 hours reduced to 20 because mature system supported by HQ, good results in the past and large outside premisses. Also, process is with many personnel performing each a short simple task. Grounds in use as washing spaces for trucks and parking spaces for personnel and trucks.		

6. Audit Duration Details	
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	
	Group QA manager		X	X	X
	Manager Meat Processing		X		
	Maintenance manager			X	
	Afdelingsmanager packing		X		
	Afdelingsmanager slaughtering and stables		X		
	Administration Meat Processing		X		
	Manager Operations Support		X		
	Coördinator Expeditie		X		
	Coördinator Weighing		X		
	Flow Manager Middles		X		
	Employee Dispatch		X		
	Department leader Dispatch		X		
	Employee Dispatch		X		
	HR Manager			X	
	HR Officer			X	

	Teamleader Maintenance		X	X	

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

Document control			
CB Report number	RQA0732002 job 4749492		
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
4.2.4	Auditor was able to enter the site without permission as building activity caused opening of gate.	The auditor was redirected to the appropriate entrance, after which she was signed in and picked up by a representative of the quality department.	An employee will be stationed to always be present to supervise the gate in the event that the sensor is triggered, so as to redirect possible visitors of the company to the appropriate entrance.	When closed, the gate in question can only be accessed or opened from the inside of Vion Groenlo premises and not from the outside. Due to some construction work near the gate, the sensor was continuously triggered, causing the gate to remain open.	2023-03-24	
4.5.3	Compressed air class not determined not demonstrable which audit class is to be in place. Seen compressed air used for blowing loins to ease cutting process so in use for direct contact.	The quality class is included in the HACCP process management plan: *"Regelmatig onderhoud filters Alleen kwaliteitsklasse 1 max.; vuil/stof : 0,1 micron max.; olie resten 0,01 mg/m3"* See picture.	If adjustments are to be made in a process, these are jointly reviewed by the HACCP team. Possible risks and control methods are adequately assessed, and this is immediately noted in the minutes of the HACCP team meeting, to implement the	The subject was previously discussed within the HACCP team, the quality class was determined, noted and implemented after consultation with the supplier and the head of the technical department, who is also a member of the HACCP team (see	2023-03-24	

Minor						
			change on the HACCP plan.	picture below), but it was not stated in the HACCP plan.		
4.9.1.1	Observed outside storage of chemicals not secured or locked.	During the course of the audit, the chemicals were directly placed in a designated chemical storage container.	The facility services coordinator has been addressed to ensure that all full chemicals are stored in the designated storage container. In the event that some full chemicals need to be returned to the supplier, these should also be stored in the proper chemical storage container until they are loaded and picked up by the supplier or transporter.	The empty chemical containers were scheduled to be returned to the supplier at a later time on the day in question, and the department seized the opportunity to return some full chemicals back to supplier. These were however wrongly placed on a drip tray outside and not in the appropriate storage space.	2023-03-24	
4.14.4	Rat bait observed in the packaging storage department not taken up in the plan.	The rat bait in question has been removed from that position.	The relevant employees have been addressed to follow the advice of the pest control company. The layout plan available to the pest control company will be reviewed at least once a year to ensure that any structural changes in the	The observed bait was placed in that position of the storage department due to the then open space. A wall has been built, separating the space, making the rat bait in that position redundant and not functional. However the bait in	2023-03-24	

Minor						
			construction are taken into account and, if necessary, appropriate adjustments are made to the layout plan.	question was not removed by the pest control company because the employees of the storage department made a choice to retain it as an 'extra' bait.		
5.2.1	Found one dolav with art NAR Vlees A Cat3 BTW-L GF with the authority oval EG367NL. It was stored outside together with 20 other dolavs with Cat3 material and Cat 2 material in direct sunlight.	During the course of the audit, the label settings were changed and a correct label was printed without the authority oval NL 367 EG.	When a new article, including category material, is to be created, the label selection, data and settings must be correctly chosen by the administration department, after which it is communicated to the quality department for review and approval. Only after approval, can it be used as a standard label for products. The employees of the *expeditie* have also been reinstructed with regard to the label checks; the data on the label must comply with the specifications. With regard to the dolavs, according to EU	When selecting the new article number (in this case, for a category material), the correct settings for the relevant label were not selected and were not communicated to the quality department for assessment. The deviation was not discovered by the *expeditie* department during the SSOP checks.	2023-03-24	

Minor						
			regulations, category materials should be stored in a cooled area if not shipped within 12 hours. This has been communicated to the relevant employees.			
5.3.1	Observed is Sodium Bisulfite onsite in use at partner which is not taken up in the allergen procedure.	The use of sodium bisulphite and the possible risk of contamination has been taken up in the HACCP process management plan, with the conclusion that there is no risk of contamination with allergen for Vion Groenlo products. See Appendix 'Extract_ Procesbeheersplan'	Substances used in the company's production areas will be assessed and, if necessary, appropriate adjustments will be made to the HACCP process management plan.	The sodium bisulphite is used as a diluted solution by an independent partner company for mixing intestinal mucus. The substance is stored in a secure chemical storage container, the use takes place in a closed room, apart from Vion Groenlo processes and does not come in contact with our raw materials and products.	2023-03-24	
7.1.2	Skill matrix defined however the skills of the instructor is not taken up. Not demonstrable who is the trainer.	For each skills matrix, a colour system is used to indicate which employee is authorized for a position in order to educate/train other employees in this.	The skills matrix is reviewed at least annually to assess an employee's knowledge and suitability as an instructor, and appropriate adjustments will be made where necessary.	The instructors are known to the HR department and are on a separate list, but are indeed not listed on the skills matrix. However, based on the comments made during the audit, the need to indicate this on	2023-03-24	

Minor						
				the skills matrix was seen and this was rectified.		
7.1.7	“Overzicht machine instructies.xlsx” is not actual as several overdue items and several not present persons still in the list.	The deviation was addressed by setting up a new file containing only current data.	The file (tool) is set up in such a way that only employees who have received an (re)instruction can be scheduled for work activities. The tool also indicates when an employee is due to receive a re-instruction and for which machine.	Due to personnel changes in the department and the transfer of tasks, the updating of the relevant file was delayed, as a result of which the overview contained employees who are no longer employed, and employees whose (machine) instruction had expired and who therefore have to get a refresher training.	2023-03-24	

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**

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
			LA	2023-02-27	08.30	16.30	Physical	
			LA	2023-02-28	08.30	16.30	Physical	
			LA	2023-03-01	08.30	12.30	Physical	

1. Senior management commitment

- **Product safety and quality culture plan:** The level of the 'culture' at the site is identified by introducing and implementing a plan for the development and continuing improvement of a food safety & quality culture (verified this plan in the X-matrix in which several actions are stated). During the audit the implementation of this plan (which is ongoing) was also verified on the factory floor and all other departments that were audited. Clear individual and group values, attitudes competencies and patterns of behavior were visible (seen f.i. whistle blowing system, training, 5S system, production startup meetings). The success of this plan is measured by means of clear objectives on complaints, training, results from inspections as Pre SSOP and SSOP. The reviews on the plan are performed 4 times a year. Last review seen over Q4-2022. Senior management was available to discuss the plan during the audit. Spoken to , plant manager of the site. Product safety and quality culture is also outlined in the company policy (seen policy F-GRO-NL-10144 r15 dd 13-02-2023 and part of internal audit program P-VION-10011.
- **Food safety and legality objectives:** Clear targets are set for production in through optimizing of the organization concerning food safety and growth. These are discussed in the X-matrix 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 (ref Q4-2022. Seen f.i an increase in foreign body complaints compared to last year for which a project group is installed). Further objectives (currently 18 projects are defined) are for instance: improve onboarding by e-learning. Frequency of objectives monitoring in meetings is quarterly by management team and at least annually management review is set up. Verified quarterly meetings last one January 2023. In these meetings the follow up of the objectives/targets is followed.
- **Management Review:** In the quarterly Management Review are several items taken up and annual there is verification of the HACCp, VACCP and TACCP systems (verified last complete and full MR dd 07-07-2022 over July 2021- June 2022. All required items are discussed, and Food Safety objectives are set. Present this management review meeting are site manager, production manager, QA manager, several departmental leaders. The recording and communication of these minutes with actions to staff are done through tier meeting, huddle meetings, through newsletters, on canteen wall with white boards, TV screens.
- **Regular meetings:** Verified overall meeting schedules. Several routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. The lean methodology of communication is intensively applied.
- **No logo usage, standard available onsite**
- **Previous non-conformities:** All non-conformities have been closed out suitably (also of last audit), root causes for previous non-conformities were identified and preventive actions were implemented. RCA based on 5Why but depending on the risk and impact of a deviation/non-conformance. Where necessary an improvement plan was be written. Seen overall action plan the MR last update after Q2-2022 in January 2023.
- **Organizational 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 are announced in the production site. Also, Members of the Food Safety Team are announced. The organizational structure (seen document P-GRO-NL-10117) reflects the current structure and reporting is up to date. RACI clearly documented in procedures and working instructions as part of the QMS/HACCP-system. Relevant documents available via the network within the organization and embedded in the quality and food safety objectives. Director Quality of HQ and plant manager are driving food safety and quality culture improvement based on TPM philosophy. Performance

management (white boards / TV's and daily performance meetings are implemented). In the chart all levels are defined for the departments. Site management team includes Food Safety Manager. The QA department responsible for food safety, legality and quality items is reporting within the management team meetings. Every production department (5) has its own leader: slaughtering, facility/logistics, dividing department, cutting department, packing department. Deputization is described. Clear responsibilities/competences have been documented. All staff are aware of their responsibilities and have access to relevant procedures. The site does not use a food safety consultant in the development / maintenance of food safety systems, who is responsible for the day-to-day management of the food safety system and HQ is readily available for assistance and consultation. During the audit the Group QA manager was onsite to assist the new and unexperienced QA manager.

- **Reporting food safety issues:** Food safety risks, concerns or non-conforming product issues are reported by staff and resolved. Seen f.i the slaughtering process in which deviation correctly are addressed. The company keeps up to date with emerging issues, legislation, and good practice through memberships/HQ and newsletters.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
1.1.13	No logo usage

2. The Food Safety Plan – HACCP

- **HACCP Team:** The organisation is having a defined food safety team with the team leader well qualified and experienced and the team consisting of multidisciplinary employees, who are experienced and knowledgeable in their fields with required level of food safety training. The HACCP Team is led by the QA manager who has limited experience but is assisted by HQ and onsite team member with widely experience in the meat and food industry.
- **Scope of HACCP:** HACCP system scope is laid down in P-GRO-NL-10140 and covers relevant processes and all products on site. Product is suitable for regular consumer groups. Product descriptions laid down in specifiactions per article. Product groups identified and relevant information is described (product portfolio, general food safety risks, packaging types, composition, ingredient groups, microbiological, chemical radiological and physical properties that impact food safety , maximum safe shelf life under prescribed storage and usage conditions. Information on Food safety is included.
- **Process flow diagrams:** Key process steps / operations to manufacture products within the scope of certification were verified for all processes during the audit and steps were shown. The several stages can be recognised. Product characteristics: Delivery of pigs, slaughtering of pigs and sows, cooling, dividing, deboning, cutting, trimming, packing, store and dispatch of pork and pork by-products. A set of flow diagrams is part of the HACCP documentation, the steps are: receiving pigs/sows, dirty and clean section of slaughter process, cooling, dividing, deboning and cutting, packing, store and dispatch. The flow diagrams of the processing process are up-to-date and yearly verified in the re-assessment of July-2022. The flow diagrams accurately reflect the production processes (seen flow docs Routing in P-GRO-NL-10183 dd 20-2-2023.
- **Hazard analysis:** VION has a corporate risk assessment process for food safety and quality aspects and a corporate defined PRP programme. This is documented as P-VION-10000 and is managed by the corporate QA department of the HQ in Boxtel. 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 occurrence of the hazard affecting finished product. 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. In the system of risk assessment, a decision tree is taken in and also method of risk analyses. Significant hazards considerd for each step are: foreign bodies, pesticides, chemical risks (including lubricants, cleaning and disinfectants and bacteriological risks. The analysis is laid down in P-GRO-NL-10140 (processes). Hazards are on likeliness of a hazard occurring = 3 x 3 matrix). A decision tree is used. Score ≥6 is CCP, <3 PRP and 3<6 CP. The HACCP Plan refers to existing regional, national and European standards in the field.

- **Critical Control Points, limits and controls:** Based at the actual HACCP plan, CCP's apply (P-GRO-NL-10139) with the critical limits:
  CCP1: faecal contamination on carcass. Zero contamination allowed in hourly sampling of 25 carcasses, in line measurements.
  CCP2: product temperatures at dispatch for organs (<3°C)
  CCP3: product temperatures at dispatch for meat (<7°C)
  CCP3A: product temperatures at dispatch for vacuum packed products (<6°C)
  CCP5: Incoming/returned organs <3°C
  CCP6: Incoming/returned meat <7°C
  Some 30 CP's apply next to the CCP's. EG CP on metal detection.
  Actions when monitoring level goes beyond acceptable limits are also mentioned within the HACCP plan they are recorded and investigated. Seen several SSOP form during factory tour and in the documents reltaed to the tracetest. The CCPs which have been determined, including critical limits, are all checked during audit round, documentation review and vertical traceability test. Clear description of the key elements of the CCP's, CP's and PRPs.
- **Validation, verification and review:** The company has validated and verified the HACCP/ Food Safety Plan, including the critical limits, control measures and PRPs specific for controlling food safety hazards. Procedures of verification have been established to confirm that the HACCP or food safety plan, including if 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 is verified. Results of verification/validation are recorded and communicated to the HACCP food safety team. The HACCP plan is reviewed and updated by the HACCP team whenever changes in the production or the related processes occur. The HACCP system is verified at least once a year by the Food Safety team. The HACCP- plan including all CCP's with critical limits has been verified during the management review. No special issues have been noticed by the team. Last time System is verified July 2022, last time CCP's have been verified July 2022, last time CP's and PRPs have been verified July 2022.

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:** Quality Management System with department specific work instructions is available in , the network and accessible using workstations available on-site. Documents are available in 3 languages (Dutch, English and German). Also, on-the-job training is available supporting working instructions and procedures as part of the management system. Documentation is up to date.
- **Document control is via the application :** Documents seen during the audit were complying. No restrictions for use with valid password. Changes are visible in yellow.
- **Record completion and maintenance:** Records are in good condition and retrievable and can be electronic or paper. 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. Records are verified of 2022-10-18, 2022-10-17 (vertical test): records of SSOP's, CCP's, pre-SSOP's, water analysis, microbiologic product and environmental analysis results, etc, were seen.

3.4 Internal audits

Reference procedure: P-VION-10011v7 dd 15-11-2022 internal audits

The scope of the internal audit program covers the Food safety and quality management system. The Food safety plan, Food Defence and Food Fraud plans, PRP plan and the Food Safety Culture plan. All chapters of the system are audited with the related implementation in production, based on risk.

Senior management is involved in the audits in a sufficient way. Internal audits are performed according to planning 2022. Internal audit plan is a rolling 1-year program. The program with scopes and frequencies is based on a risk assessment. The planning consists of 4 internal audits per year which are conducted over all VION sites by VION QA managers.

Internal audits are performed by trained QA managers of VION production sites, to maintain independency). Internal auditors are trained (seen for and) 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. Timescales of corrective and preventive actions are determined and demonstrable.

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 of 3-10-2022 and 22-9-2022. All actions were closed or within due date. All actions are also collected and discussed in the HACCP meeting and minutes of this meetings and an action list is available.

Hygiene (GMP) rounds are performed on a monthly base (seen building inspection on F-GRO-NL-10197, 27-12-2022 YTD). Glass and hard plastic rounds are performed on a quarterly base (verified records verified records F-GRO-NL-10147 dd 28-12-2022). The actions of the rounds are sent to the team leaders and discussed in the HACCP meeting. Cleaning inspections are done daily by the QA department and during the board meeting every morning all actions are also discussed. The rounds are done by use of a checklist which is stored in the quality system and provides a clear action list. To be digitalised within a short time too.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Reference procedure: P-Food-10002 : - pigs/sows; - Agencies; - non food (ingredients, services, packing material).

Suppliers are divided in 3 groups. The purchase and delivery of pigs/sows is managed by VION Farming, located at the HQ in Boxtel. The intake of the pigs, including of the verification of relevant documents is a local responsibility. This includes verification of data from VION Farming. Intake is checked for the delivery of FS pigs, delivered at 2022-10-17 (vertical test). The suppliers of that day were all demonstrable recognised and approved for VVM, BL* and IKB. No other raw material than pigs and sows. The results of the inspection (am and pm), are communicated to farmers and HQ. This includes delivered dead, urgent slaughterings, slaughtering defects.
All materials bought that form part of the final product (packaging) are sourced through approved suppliers and are monitored. All suppliers also of packaging materials and services have to be approved by HQ. Intensive communication including reporting of defects and complaints is demonstrable. Site is responsible for reporting defects, HQ does negotiations. An approval tool is in place and suppliers are evaluated. Corporate contracts on all including logistics, maintenance and cleaning. At the HQ there is a central purchase department for non-food, food (ingredients but not relevant for this site) and services. The approval and evaluation process of non-food suppliers and services is with input of the several sites of VION and described in P-FOOD-10032. Also, P-FOOD-10025 on supplier assessment and P-FOOD-10026 on Product and service requirements. Purchasing is done by the purchase department and makes use of the centrally agreed contracts. HQ procurement officer was not audited on the procedure due to availability constraints. Approval was shown by QA manager.
No brokers are used.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Reference procedure: F-GRO-NL-10178 Traceabilityof packaging material.

A documented intake of pigs/sows and packaging materials is available at the several departments.
Acceptance on life animals is under strict authority of Dutch NVWA.
On packing material main issues to check are damages, labels and quantity.
Products are stored according to requirements. Intake registration is verified 2023 YTD is the system.
During audit seen for product LDPE foil, batch .

3.5.3 Management of suppliers of services

Reference procedure: P-FOOD-10026 on Product and service requirements Management of suppliers of services

The approval was shown for contracted services. Service suppliers (based on risk assessment) are evaluated yearly by appointed sites who use the contractor.
Monitoring was shown for contracted services, formal agreements (including food safety and food defence aspects) and training was verified for:

- Pest control ( )
- Laundry services ( )
- Contracted cleaning ( )

Catering services are not applicable.

3.5.4 Management of Outsourced 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, generated by application MDM (Master Data Management) a central led tool for specification management and are part of an online specification system. Specifications contain relevant aspects and requirements; they include key data to meet customer and legal requirements, limits for relevant attributes (e.g., relevant chemical, microbiological, physical and allergens standards) and assist the user in the safe usage of the product. Specifications are reviewed at least every three years or if changes occur. Reviewed several specifications during the audit, for example:

- Cleaning agent: cleaning detergent
- Finished product; art Snitbeschrijving Buim A shtr zzw 26cm FSA dd 19-04-2021
- Packaging; spec dd 21-04-2022 and Doc dd 03-03-2022

Also verified during vertical trace test.

All sampled specifications were available and in an actual version, last review of specifications is depending on request of change of the customers or specifications, provided by suppliers in relation to the company VION, but the specifications are reviewed at least every 3 years. During the audit no specifications seen older than 3 years.

Specifications of finished products are created in MDM by sales managers. There is close cooperation between the department managers of cutting departments and sales managers during the development of new specifications of final products Formal agreement of customer branded products is verified through the system of the retailers.

3.7 Corrective and preventive actions

Correct control seen for handling corrective actions related to CCP, pre-SSOP and SSOP checks. Several action lists in place. The principles of lean management are in use for the management of corrective and preventive actions. This is translated in VOS 2.0/ (VOS = VION Operating System). Corrective actions are initiated via the team huddle communication structure. If not closed within the time frames actions are escalated towards the tier 1 level. A4 papers are in use when root cause analysis is to be done and defining corrective actions. For complex items an A3 approach is in use for the in-depth root cause analysis. VOS report/evaluation during Q meetings. Currently no A3 change projects in place.

3.8 Control of non-conforming product

Reference procedure: P-GRO-NL-10168 non-conforming products.

Raw materials and (semi) finished products are checked on a regular base during the process stages. Products are released by production team leaders. Corrective and preventive actions are described in several work instructions. Clear process well understood by staff that was interviewed during the audit.

Manual hold by labelling pallets of recipients with label covering the required information. Release of products on hold by production manager or QA-staff.

Segregated section in the warehouse for returned goods. Corrective and preventive actions system is up to date. The handling of non-conforming products is according to requirements. No blocked products seen during audit round, besides actions in the slaughtering line on correcting slaughter findings.

3.9 Traceability

No consumer packed end products are applicable. Traceability system operates through computer system (, others) and paperwork enables trace of life pigs to packaging from supplier through processes to packing and dispatch. Pigs are identified by eartag and are entered into the ERP system and carcasses are coded after kill with slaughtering dates and unique number. After cutting identification is on day batch related to slaughter-date.

For traceability several tests a year. Last one dated 27-1-2023 on slauhterday 25-11-2022. Traceable: 100%. No corrective actions, report including mass balance, carried out within 3h.
With a vertical audit list, during the audit, initiated by the auditor, traceability was tested on:
Product: Belly
Batch code:
Article number:
Produced on: 18-11-2022
Mass balance: 1722 kg

Fast tracing (forwards/backwards) including packaging was possible in the records/ System. No rework. No product left, all sold. Seen product specifications of all raw materials and finished product, receipt records, food compliance certificate is verified. Fully traceable one-step-up and one-step-down the system, including packaging. Verified records of CCP's, CP's and PRP's in coming control checks, production checks, calibration and analyses were verified too. Time to perform the test was respected (<3h). 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.

3.10 Complaint-handling

Complaints are sent by sales to the complaint inbox email address of VION Groenlo. All complaints are discussed in Tier 1 meetings. Appr 30 complaints per month are categories in several categories according the complaints procedure. Corrective actions related to complaints are organised and coordinated by the responsible department managers. Complaints including analysing reports and trend are part of the quarterly management review report. The complaint handling of customer on foreign bodies was seen and a project on decreasing these complaints is started.

A trend analysis is available as well as elaborate explanation in the MR. All complaints were settled adequately. All supplier complaints go back to the suppliers and feed back into the supplier approval and are taken into the supplier audit when the company visits.

3.11 Management of incidents, product withdrawal and product recall

VION Food Group has 3 pork slaughtering plants in the Netherlands and 5 in Germany and in total 29 producing plants. In case of emergency situations the production will be transferred to another VION plant as was done with all EKO pigs which are transferred to Apeldoorn currently.

The recall process is documented as P-VION-10015 Crisis manual and P-GRO-NL-10181 for the specific Groenlo situation.

A recall test was done on 2022-02-22 and planned for this week but not executed due to this audit. Track and trace test are performed several times per year also for other audits (eg IFS PIA, IKB, SKAL). One test is outside normal working hours. Past years no actual recall or withdrawal took place. There was one incident on antibiotic residue levels in a sow which not was put to the market.

The certification body will be informed within 3 working days in case of a product recall.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
3.5.4	No processing or primary packing is outsourced.
3.9.4	No rework takes place

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.

4.2 Site security and food defence

Food defence risk assessment documented and based on TACCP. Risk score calculation based on impact and likelihood of occurrence. The site is completely closed and access to areas of production, packaging and storage is limited to authorized persons. Also fences and cameras installed inside / outside. Visitor reporting system in place which is also applicable to contractors. Supervision by maintenance staff. Truck drivers need to report to the porter before they can enter and will be supervised by warehouse staff. The company is always guiding the visitors while visiting the production areas. Staff is trained. External tanks or intake pipes are locked. There is legal requirement for site registration with the local authorities: EG367NL.

Seen the Food defence plan (TACCP) P-GRO-NL-10231 dd 13-1-2023. The Food Defence plan is suitable for the site. The outcome of this TACCP is that all risks identified are mitigated.

Seen in this plan for instance a checklist on Food Defence items with associated control measures on gates and doors verified June 2022.

Minor: Auditor was able to enter the site without permission as building activity caused opening of gate.

4.3 Layout, product flow and segregation

The production and storage zones have been defined and based upon a risk assessment all zones are “Low risk areas” (all fresh meat is sold to B-to-B industries/butchers and do need a (heat) treatment before consumption. No high risk or high care operations. In the slaughtering department, it is not allowed to go from dirty to clean departments. At the end of the dirty slaughtering department the latest step is cleaning by heat/fire to prevent contamination.

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

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

Suitable flow is implemented. In general, a modern building fabric, well maintained. Good facilities. Flat finished walls, suitable for processing and packaging activities. Floors are well designed and in good condition. No elevated walkways, access steps or mezzanine floors that are adjacent or above open product.
Drainage system and ventilation are according to requirements. Well maintained ceilings/constructions with a good access to suspended ceilings. Protected glass, no windows could be opened in the processing areas.
Doors in good condition, external doors are well fitted and kept closed when not in use.
There is one dedicated washing area present. The washing of equipment is done separated from production. Plastic strip curtains are present and clean. Condition and suitability was according requirements.

4.5 Utilities – water, ice, air and other gases

An air pressure system is installed, direct product contact. Suitable maintained; but see minor on classes of filters. System is in correct maintenance by external service supplier.
Water coming from the mains. Overview relevant tap points available. Sampling of tap point 4x/y as reviewed for the vertical audit (TPC, coliforms and E. Coli, last sampling verified 9-3-2022 and 13-06-2022), for the production department, carried out by ISO 17025 accredited lab). An up-to-date schematic diagram for water distribution is available.

Ice production unit (e.g. rusk production) for cooling organs.

No other utilities are used regarding to the products. No special ventilation systems needed.

Minor: Compressed air class not determined not demonstrable which audit class is to be in place. Seen compressed air used for blowing loins to ease cutting process so in use for direct contact.

4.6 Equipment

Equipment installed is suitable and designed for the intended purpose. Equipment is specified, tested and commissioned before commercial use. Equipment which is in direct contact with food is suitable for food contact and meets legal requirements where applicable. Equipment made of stainless steel. Belts are to be in contact with food. There is a procedure for moving static equipment detailing preventing potential risks to food safety and equipment integrity. Equipment that is not in use is always taken into the cleaning schedule.

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

4.7 Maintenance

Maintenance is by own resources and part of the maintenance is outsourced. Inspection of equipment condition is undertaken where necessary, such as belt condition inspection, filter checks and grease plan. Greasing plan for food grade and non – food grade grease demonstrable (risk-based approach). A detailed overview of required maintenance and lubrication was shown. Effective plan and follow up. Lubrication on identified points with food grade oils.

Preventive maintenance and condition-based monitoring programmes are reviewed after repairing existing equipment. Where applicable RCA is performed to learn of repair and to prevent this happening again. Also, the schedule could be adjusted to inspect more. No temporary maintenance seen. No major breakdowns applicable in last 12 months on machinery that disturbed the delivery to customers. Documented hygiene inspections on start-up are completed daily by the PRE SSOP checks. Attention for a hygiene clearance to production before starting production full cleaning after maintenance activities is implemented. Recording of maintenance jobs goes through computerised system , currently 81 open jobs and the system is significantly improved past year. When the site has new equipment, this is included in procedure of First time Right on introduction of new process/product/procedure. Separate engineering workshop: no issue identified, not in direct access with production areas.

4.8 Staff facilities

There are suitable changing rooms. The rooms are sited near production. Lockers for personal clothing/items are present. Toilets are not in direct contact with production. Separate storage of outdoor clothing is present. Well-equipped hand washing facilities and booth cleaning facilities in several hygiene sluices. Liquid soap, warm water, taps with hand-free operation and clear advisory sign to prompt hand-washing. Well-designed canteen, own catering. There is a clear policy regarding in the hygiene rules to food brought into premises; only to be consumed in the canteen (e.g. no peanuts related products on site). Refrigerators is provided for staff use. Eating is only done in the canteen. Well controlled facilities.

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

4.9.1 Chemical control

Control of chemicals on site was demonstrated. Approval is the responsibility of HQ Procurement department. Separate (locked) storage facilities for e.g. cleaning chemicals (sea container) and lubricating oil. Checked washing anti-cutting gloves). All chemical used are intended to use in relation to food production. This is also checked 6x/y in safety audits.
Seen check on residue on the crates with indicating paper after cleaning in the facility department: Kalium jodide check strips: no colouring: the crates were rinsed well with clean water just as checks on equipment after cleaning. Also 1x week acid cleaning including control with test strips check on residue with Peracetic acid and/or Quad. All documented on Pre-SSOP records. Regular checks are performed on checks on chemical concentration, clean sieves, temperature of the washing water and clean rinsing water to prevent problems like chemical contamination and biofilm.
All approved chemicals are suitable for food production areas. Only trained persons have access to these chemicals. Chemical spillage controls and chemical waste disposal procedures are in place and according legislations.

Minor: Observed outside storage of chemicals not secured or locked.

4.9.2 Metal control

There is a strict site policy concerning metal control. Suitable knives are widely used in production, no cut off blades seen. Daily checks seen for knives and equipment seen. Knifes are provided, changed every break at the same time when used in crates and counted on F-GRO-NL-10167. SS gloves are collected for new once in change, checks at start and end of the day are daily recorded in the SSOP registration forms of the departments. This is verified for the SSOP checks at 2022-10-18 (vertical test).
Staples, paper clips and drawing pins are not used in open production areas.

4.9.3 Glass, brittle plastic, ceramics and similar materials
Handling according to procedure. Besides daily start up checks, inventory 4 times a year. Last round performed recorded on record 28-12-2022. No glass incidents to date took place since the last audit. Staff is well trained in process and mock incidents which were part of the training (training is repeated at least once per two years).
4.9.4 Products packed into glass or other brittle containers
Products are not packed into glass/brittle containers.
4.9.5 Wood
Wood is not allowed (and not present) near open product areas.
4.9.6 Other physical contaminants
Control on foreign bodies is recorded on SSOP like metal, dirt (lane lubricant), pieces of plastic of eg gloves/aprons, bags checks on metal pieces of equipment, glass control, fraying on table tops and belts are checked, all recorded on the SSOP on daily basis. Plasters are covered with gloves. Pens used in production area are standard blue metal detectable pens, without small parts**.**
4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
At this site the semi-bulk products are produced. No consumer packed product is involved. A documented assessment in association with the HACCP study is performed and based upon the HACCP study no foreign body detecting equipment is to be determined a CCP but a CP on defined production lines. 3 Metal detectors are installed (see 4.10.3) on customer request. Also the eagle is capable of foreign body detection. Foreign body alertness has the attention of all employees working in production, currently a project is running on this topic, led by QA manager.
4.10.2 Filters and sieves
No filters and / or sieves
4.10.3 Metal detectors and X-ray equipment
The company has 3 metal detectors in cutting department and in packing department which are identified as CP. Test pieces (certified) in use are: - 5.0 mm Fe - 6.0 mm non Fe - 8.0 mm SS Records of the use of the metal detector at 2022-10-18 are verified (vertical test) and demonstrable. Metal catches are recorded at F-GRO-NL-10098. During the site audit the control of the metal detectors is demonstrated by operators. The used method was in conformity with the instructions in P-GRO-NL-10190. Corrective actions are clearly defined. Data of the metal detectors is available in the documentation. E.g. the sensibility of the detector is clear. Belt stop/alarm light goes on, alarm sound is heard. The CP was demonstrated, including a right way of recording during the audit. No issues YTD.

4.10.4 Magnets
No magnets are used into the process.

4.10.5 Optical sorting equipment
Na (although the Eagle is an optical sorting machine it is in use for measuring fat content in mixing of batches of meat, not for foreign body detection and removal).

4.10.6 Container cleanliness – glass jars, cans and other rigid containers
No containers are in use. No products packed into glass/brittle containers.

4.10.7 Other foreign-body detection and removal equipment
No other foreign-body detection and removal equipment.

4.11 Housekeeping and hygiene
Procedure in cleaning (R&D) is present in P-GRO-NL-10021 v14 dd 7-12-2022. Cleaning is partly outsourced and partly executed by own facility department. Facility personnel is identifiable by red clothing. Plan is documented in F-GRO-NL-10021. The daily cleaning of the plant is outsourced to a contracted specialised cleaning company with agreement validation dd 2019-11-05, inventory plan dd 15-12-2020. Daily cleaning and disinfection of the production departments <3 m. Plan in place with all items, frequencies, means and detergents. Communications via online applications and whatsapp. Periodic cleaning (ceilings, walls >3 m) is taken place at request and is coordinated by the QA manager. Cooling areas are cleaned by a specialised contractor. Daily visual check at cleaning with pre-SSOP systematic. Weekly check at the disinfection process with agar samples and residue checks. Trends in agar results show results on some places on basic level and on other places good. Corrective actions are demonstrable and are VS, PS or CS. Vertical test documents checked of week 42-2022. Residue tests show no deviations. Daily cleaning of the staff facilities and outside terrain is responsibility of facility department. CIP is applied in the blood tanks but these tanks are outside audit scope and owned and handled by the customer of the blood. VION does however checks if the system including the CIP is working well. Dosage of detergents is verified externally 4x/year with titration tests by external party in close cooperation with detergent supplier. Swabs are taken, and a trend analysis showed good results. Actual trends in are verified: show stable results. Listeria is analysed during environment check see also 4.11.8.

4.11.7 Cleaning in place (CIP)
CIP is not applicable.

4.11.8 Environmental monitoring

A risk based environmental monitoring programme is in place, part of the micro analyses plan (both for environment as well as the products), risk based and includes the sampling protocol on agar including Listeria in different departments of the factory on identified locations including gutters and coolers.
Listeria is analysed during environment checks as a CP and monitored every quarter. Goal is max 6% of the swaps positive. Correct RCA seen, corrective actions demonstrably implemented as sometimes belt are replaced or other actions as changed cleaning protocol. These corrective actions were demonstrably effective.

A 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.
This cleaning process is monitored by agar control, verified analysis 20-10-2022. Also, residue tests are performed with Kalium Jodide. Last concentration test on chemicals performed on 20-12-2022.

A clear review and trend analysis is taken into the management review (no issues).

Verified:
Allergen swab on lactose/ D-glucose available.
Residue chemical Kalium-Jodide 4x a year, seen date 5-11-2022 performed on F-GRO-NL-10091, no issues.

4.12 Waste and waste disposal

Reference procedure: XXX 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 (Contracts are applicable).
This company is all qualified for disposing these kinds of materials.
Wastewater is disposed in the municipal sewage canal. Company has a clear policy to minimize the amount of waste.

4.13 Management of surplus food and products for animal feed

Rendac / Sonac / CTH are the licensed recipients of Category 2 (eg blood) and Category 3 material. In case product is rejected, all packaging including labels will be removed before collection of products for Cat 2 . No remarks.

4.14 Pest management

Pest control is subcontracted to company since April 2016 (HQ contract). Online application “Pest scan” verified. Monitoring includes rodents, flying and crawling insects. Scheduled surveillances take place 8x/year. In case of infestation extra visits are in place and reported. Besides surveillance also an in-depth QA inspection takes place 1x/y and a PRI is executed to assess and verify plan and execution.
The competence of the pest control inspectors is available in the online application. Also in the application are the plans, the means and the chemicals used. No usage of tox inside, tox is used at the life stock truck washing place currently. This area is about to be reconstructed. In-depth surveys are scheduled yearly, based on risk assessment. The report of the last in-depth inspection was seen during the audit and was dated 21-07-2022. All related action points are completed. Also the PRI was executed on 31-1-2023.

In 2022 some 25 actions were brought up by the pest manager and currently partly still open, well managed.
Trend analyses of 2022 shows an increasing trend for flies in summer, but also decrease from October 2022 (same as last years). Rats outside are sometimes detected, namely around the washing place for the life pigs lorries. This part is currently renewed coming year. No nuisance of rats inside the building. Bird control by good housekeeping and preventive protection on roof edges, birds (gulls) are challenging and currently the bones are transported in cloes truck and dolavs which is changed with past year as then the bones were outside visible by the birds. Bird activity has therefor decreased.

Minor: Rat bait observed in the packaging storage department not taken up in the plan.

4.15 Storage facilities

Packaging materials and crates/pallets are stored in a separated building. Cooled storage facilities are for product are sufficient. All chilled storage areas are linked to a recording system, linked to an alarm reporting system.
The system is verified for the temperature course in the week of 42-2022 (vertical test), no issues with the temperature control in this week. Stock rotation is based at FIFO principle.
Good storage of packaging, ingredient 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 is control is required for raw materials; work in progress or finished product.

There is no controlled atmosphere storage. There is no outside storage of food.

4.16 Dispatch and transport

During the dispatch process a pre-shipment control is taken place to verify the temperature CCP controls. This process is verified for 2022-10-18 (vertical test).

Transport is outsourced to contracted and specialised transport companies. Intercompany transport is organised via Distrifresh, this company is part of the VION Food company (IFS log. certified). Supplier approval and contract management is managed by HQ Procurement. On the opposite site of the road is situated VION Retail to which 30% of the quantity is shipped to, to be processed for B2C/retail.

Local verification of the transport process by transport audits (agar check cleanliness, verification logger /temperature: seen the digital system to monitor temperature in lorries) and check of cleanliness before loading of each truck.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.5.3	No air or gasses used for direct contact. Compressed air is filtered.
4.9.2.2	No staples, purchased of ingredients and packaging which uses staples in use on site.

4.9.4/ 4.10.6	No products packed into glass or other brittle containers
4.9.5.1	No wood is used in open product areas
4.10.2	No filters and sieves applied
4.10.4	No magnets applied.
4.10.5	No optical sorting equipment applied.
4.11.7	No CIP cleaning in use
4.14.3	Pest control is outsourced
4.15.4	No controlled atmosphere storage in use
4.15.5	No outside storage

5. Product control

5.1 Product design/development

Reference procedure: First Time Right
Process improvements are done based upon investment projects. Product design aspects are changes in cutting or packing instructions, recorded in de MDM application.
Shelf life trials are coordinated by the central QA department and is a continuous programme within VION. Seen shelf life report of Product Buik A (Vertical test 2022-10-18) Shelf life: production + 7 days, results TPC: < log 7 and Entero's < log 5, all ok.
Product development is normally not applicable except for changes in existing products and introduction of new packaging methods. In all relevant cases when the company changes anything or introduces new methods this is described in detail in a validation report.
HACCP team is involved in development processes as in the management team is outlined the controls in place to reduce the potential to introduce hazards. Validation procedures are in place, lean methodology on first time right.

5.2 Product labelling

Labelling is according to legal aspects as required by the company; several checks done during production tour. Pigs carry earmark, carcasses are marked with ink. Fresh meat is always accompanied by a label and label design is it responsibility together with MDM.

Minor: Found one dolav with art 49803 NAR Vlees A Cat3 BTW-L GF with the authority oval EG367NL. It was stored outside together with 20 other dolavs with Cat3 material and Cat 2 material in direct sunlight.

5.3 Management of allergens

In HACCP analysis (the actual plan is described in P-GRO-NL-10139) is mentioned and judged that no allergenic material is to be declared. Milk in sows as acknowledged and swab sampling on lactose is in place 2x/y on belt and surface. No risk on contamination with allergens as concluded in HACCP analyses. No herbs and spices are used on site.

Minor: Observed is Sodium Bisulfite onsite in use at partner CTH which is not taken up in the allergen procedure.

5.4 Product authenticity, claims and chain of custody

VION Groenlo is producing EKO/Bio, FS+, FS, IKB (and Standard) pork meat. Chain of custody audits are done (IFS PIA) by an external certification body (LRQA). The company has a SKAL recognition for production of Organic pork meat. Measures to ensure identity of products are in place (on pig and farm level traceability is arranged). Several software applications in place and well arranged.
Mass balance checks are kept at a daily base on 5 chains and past years there was a project to improve and automate these checks, in current tracetest the mass balance was calculated in 15 minutes which is a major improvement.
The assessment covers purchase and delivery of pigs/sows which is managed by VION Farming. This is highly in control, as currently animal welfare is becoming more and more important in the public's eye. Video surveillance and recording in place of acceptance. Detailed checks of authority, external certification body and reception procedure under supervision of SKV including of the verification of relevant documents (VKI) is a local responsibility.
The vulnerability assessment is part of the risk assessment P-GRO-NL-10157, and under annual review as seen in the MRM of July 2022. Assessment is complete and detailed.

5.5 Product packaging

Packaging materials are stored separately from production materials and part used packaging is covered prior to returning to the storage area. Product contact liners applied have colour coding and colours mean chains. As green for organic, amber for FS depending on the IP of the product. In all cases the labelling is prevalent to colour as products can be degraded. Several types of amber with blue blocks per client now introduced: AH/Plus/Other.

All packaging materials are checked and purchased via HQ. Only packaging material suitable for food contact is in use. Proof seen during vertical test.

Vertical test result check packaging material DUM 262 lot 10637511.

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

The sampling program and schedule for 2023 is seen, for 2022 is met. Results of analysis of 2021 and longer ago seen. Sampling plan according national law and HQ instructions in P-NLFOOD-10016. Sub

contracted analyses (microbiological/chemical and allergen) are carried out by a several laboratories all operating in accordance with ISO 17025. Eg L132 for microbiology.

Trend analyses in Quality Trends of swabs from carcasses do show good results within the limits (regarding to EU 2073/2005). Seen Jan-Dec 2022 TPC log<4 kve/g, Entero log <1,7 (within specification/ far below legislation). Salmonella: several samples of positive results are found, VION KPI max 5%, legislation max 6.5%). All within own limits.

Daily sampling on trimmings, N=5 TPC and Entero's, 1x week Salmonella and Listeria. KPI max log 3.7. Entero's KPI max log 1,7), Salmonella max. 5%, Listeria max. 5%.

5.7 Product release

Product release is based upon product temperature measurements (CCP) before dispatch. This is the pre-shipment process. 5 samples are taken of every batch. Records checked during vertical audit and site tour. Seen recording during the dispatch during the audit on F-GRO-NL-10001 and 100120 and there is a verification by 2 persons on measurement in F-GRO-NL-10044. Thermometers in use are Ebro 15207377 calibrated by quality department every 2 months and Ebro 15189177 and also calibrated correctly.

5.8 Pet food and animal feed

na

5.9 Animal primary conversion

For reception of live animals, strict procedures apply and a designed animal welfare officer is appointed and seen in place. No slaughtering can take place without permission of Dutch NVWA on health status of animals and on approval of documents (VKI).

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
5.2.3	No claims in use to satisfy a consumer group
5.3.7	No claims applied regarding the suitability of a food for allergy or food sensitivity suffering
5.6.2.2	No testing laboratory on site
5.8	No product rendered to pet food

6. Process control

6.1 Control of operations

The site clearly demonstrated a good control of the operational process. Processes are documented in Process Control Plans (Eg P-GRO-NL-100140 and -10157). Process control is based upon the HACCP study, legal and customer requirements. Process conditions and methods are well set at and revalidated. Systematic monitoring is demonstrated. Documented start up checks are applied and demonstrated during this visit (pre-SSOP and SSOP).
During production, correct application of CCP's and CP's was monitored and verified on a day-to-day basis. Assessed for CCP temperature control at dispatch. During production, each department has its own SSOP (checks on personal hygiene and hygiene of production performance, glass control, knife control, lane fat and condense, maintenance requests for repair. Records were checked during vertical audit and site audit. Records of 2022-10-17 and 2022-10-18 (vertical test) are verified in depth, also CCP checks were verified. The fat measurement of mixed meat is done by fat measurement equipment in line. The temperature of the chilling areas is verified; these are well within conformity with the standards. All cooled areas are linked to a failure alarm. Metal detectors are controlled 1x/ 2 hours.
A product conformity check is performed at hourly base in the cutting department.

6.2 Labelling and pack control

Labelling and pack control is on identification per id. This can be a carcass, a hook, a dolav, a crate, a box, etc. Labels are generated by application where production employees only can enter ID. Amounts by weighing/counting as system creates label ID's. The labelling and pack control process of the production for art 25275 is verified. Weighing operation only to be executed by trained and competent personnel. First and last labels of a production batch are pasted at a registration form F-GRO-NL-10184 for Hilton products and on -10172 for China products. The label is compared with the label of the last batch. With this system the company also has a reference in case of questions are complaints related to labelling.
Temperature specification of loading is defined in the CCP 2-6.
Temperature and label control seen during onsite audit of loading for customer DGS.

6.3 Quantity, weight, volume and number control

On entrance pigs/sows are counted and count of carcasses to be paid to supplier/farmer. Only sales of variable weight products. A calibration programme for measuring equipment is in place, seen calibration program of external contractor Daily check of scales via pre-SSOP F-GRO-NL-10160, yearly external calibration of scales.

6.4 Calibration and control of measuring and monitoring devices

Calibration procedure P-GRO-NL-10029 ensure relevant equipment is identified and regularly calibrated. All taken up in application . (Thermometers, pH-meter, PT100, Weighing devices, Foam/disinfect units.)
Temperature devices (CCP related) and scales (legal issue) were sampled. Hand thermometers are calibrated at least two monthly (with melting ice) and the reference yearly externally.
Seen calibration report of Loma on the Metal detector dd 09-02-2023 and Eagle on fat analysis. Internal weighing with own weights in recorded on F-GRO-NL-160.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification

7. Personnel

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

There's a yearly training programme for all employees. Training programme 2022 is seen which was executed. There is evidence of introduction training for new starters and refreshment training of employees. The induction program is partly e-learning and also usage of translators is in place. Almost all agency workers are not native Dutch. There is a training plan for all types of training including obligated training on truck driving, Health and first aid courses. Seen induction for the new HR Officer.

Competency training had taken place for the staff sampled however the administration was not up-to-date (see minor) (food safety, quality and safety). Seen the competence matrix on which personnel is planned. Level 1, A, O per person. Per position/task is assigned how many competent workers are needed.

Records were sampled for the new QA manager and employees including the assistant foreman in the dispatch area on CCP training. Hygiene rules and regulations are defined and available (employees, temporary employees, visitors). CCP training is available and in place.

For all own employees the refresher training is 1x/2y, latest June 2022 online. There are >10 certified animal welfare officers trained yearly.

Minor: Skill matrix defined however the skills of the instructor is not taken up. Not demonstrable who is the trainer.

Minor: "Overzicht machine instructies.xlsx" is not actual as several overdue items and several not present persons still in the list.

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

Well detailed (all requirements of chapter 7.2 are included) hygiene rules (handed out at the porter to all visitors) are documented. Visitors have an intake at the porter and have to fill in a questionnaire on their health, contact with livestock and covid issues.
On all entrances hand wash and boot wash facilities are applied.
All personnel are instructed on the documented hygiene standard of VION to be applied, prior to commencing work, this includes temporary personnel, visitors and contractors.
The standards for personal hygiene, dress code, medicines, make up and perfume, jewellery and medical screening have been defined and communicated to all personnel prior to commencing work. These hygiene rules are effectively enforced.
The guidelines for personal hygiene are documented in the brochure which every employee receives at start of working for VION (good business practice (how we do business at VION)). Also the standard hygiene rules are published on the board in hygiene.
Metal detectible plasters are checked and controlled by the facility department. Records were demonstrable. All batches are checked and date of check and approval is written on each batch supplied to the different departments.
Rules are available in several relevant languages; f.e. Polish.
Correct use of blue plasters and storage of personal medicines observed and no remarks during the audit.

7.3 Medical screening
Medical screening prohibited / 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 is in place.
7.4 Protective clothing: employees or visitors to production areas
All employees are wearing suitable work clothes. White, Green, Red, dark or light Blue, depending on department. Helmets and hairnets have colour coding to indicate department and hierarchy. All employees and visitors are wearing protective clothing and shoes or boots partly provided for by VION. Change of work clothes is at least daily. The wearing of a disposable hair cap is mandatory. Wearing of jewellery is not allowed (zero tolerance policy). Laundering of protective clothing is done by a contracted professional laundry company. The subcontracted laundry is audited as part of the supplier audit programme. Agar micro results of the work clothes are good. There is a check for work wear during the hygiene inspection. (SSOP item). There are also facilities for temporary workers, visitor facility is given up to create more space for workers. Gloves are worn (policy seen), disposable gloves are changed each break. Safety gloves are washed each break on site. Aprons in use, correct cleaning seen. Jackets of Maintenance workers are not washed but replaced if too dirty/yearly.

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
Not applicable
9.4 Product inspection and laboratory testing
Not applicable
9.5 Product legality
Not applicable
9.6 Traceability
Not applicable

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

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

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

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