Audit Report Global Standard Food Safety Issue 9

1. Audit Summary			
Company name	Vion Tilburg BV	Site code	1886989
Site name	Vion Tilburg BV		
Scope of audit	The slaughtering of cattle and the deboning, cutting to specification and packing (foil or vacuum) of beef. The production and packing (foil, crate or drum) of slaughter by-products, semi-processed scalded stomachs.		
Exclusions from scope	none		
Justification for exclusion	na		
Audit start date	2024-04-08	Audit finish date	2024-04-10
Re-audit due date	2025-05-10	Head office	No

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

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit programme	Announced
Previous audit grade	B+		Previous audit date	2023-03-07	
Certificate issue date	2024-05-15		Certificate expiry date	2025-06-21	
Number of non-conformities			Fundamental	0	
			Critical	0	
			Major	0	

2. Audit Results

	Minor	9

3. Company Details

Site address	Enschotsestraat 28 5013 BD Tilburg		
Country	The Netherlands	Site telephone number	+31 (0) 13 462 08 00 345
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, day operation	
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; Organic; IFS PIA; BLK	
Outsourced processes	No	
Outsourced process description	na	
Regions exported to	Europe Asia	

4. Company Profile

	North America Choose a region Choose a region Choose a region
Company registration number	NL87EG
Major changes since last BRCGS audit	New offices. Construction works for stables are starting shortly as well as the construction of an extra corridor for better circulation in the plant.

Company Description

VION Tilburg B.V. is a cattle slaughterhouse and industrial butcher. It is one of the several sites of VION Food Netherlands which is a company with global presence. The location Tilburg is NVWA approved (NL 87 EG). VION Tilburg B.V. produces beef products and slaughter by-products and offal (organs, processing of stomachs (scalding) and the processing of first stage of natural casing (cleaning/ heating of bovine intestines)). The cattle is bought by VION Rundvee BV at the general mostly Dutch and Belgium market. Slaughter capacity is animals per day per hour which is all done in 1 shift.

The cutting department is supplied by pre-selected carcasses and very first cutting. The department includes about 3 main routes (forequarter, hindquarter and butcher handling). There are many equivalent activities (deboning, cutting to specification). Packing is at semi-bulk level (no consumer packed items). Trimmings are packed loose in crates/ dolavs or vacuum packed. The by-products are packed loose in crates/ dolavs or vacuum packed. The main customers are operating companies in the VION Food Group, retailers related processing within the Netherlands and Europe, Fast food producers, and business to business in Asia and Canada and almost all over the world. Some beef is sent to an external provider for freezing, packing and final storage (GFSI certificated). Some products from sister VION company in Enschede are cross docked in Tilburg.

The site is situated at an industrial area of the town Tilburg. The oldest part of the building is from 1920. In 2006 a new building for the cutting and packing departments has been constructed. Past year extension of staff facilities, storage of crates and primary packaging material, and creation of new offices. Site currently still in building activities as stable is adjusted to best practice and state of the art stables for accepting cattle according to animal welfare requirements. Also outside activities to be finished within coming months as paving and porters house creating correct and logical flow for cattle carriers and meat carriers according to European law.

VION Tilburg B.V. is certificated against ISO 9001 (multi-site certification) and holds SKAL approval (001997), IFS PIA declaration and certificate for trading of BL2* meat. At the moment the company employs approximately) people (including subcontracted personnel about % mainly in operation). Production takes place in one shift. The surface is sq. meters and the used quality system is based on one HACCP-study.

4. Company Profile

www.vionfoodgroup.com.

5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category Category Category Category Category				
Finished product safety rationale	Cooled red meat and by-products/offals. Beef intended for further raw processing is under a positive release regime.				
High care	No	High risk	No	Ambient high care	No
Justification for area	Appendix 2 is applied. In general beef and by-products are heated in one of the next stages of processing at the customer. Beef intended for further raw processing and consumption is under a positive release regime.				
Allergens handled on site	Milk 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 Choose an allergen				
Product claims made e.g. IP, organic	BLK, Organic/BIO				
Product recalls in last 12 months	No				
Products in production at the time of the audit	Different meat cuts, slaughtering of cattle				

6. Audit Duration Details			
Total audit duration	24 man hours	Duration of production facility inspection	12 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
	Production Leader	X	X	X	X
	Quality Manager	X	X	X	X
	Quality Manager	X	X	X	X
	Financial manager	X			
	HR Manager	X		X	X
	Commercial Manager	X		X	X
	Maintenance Manager	X	X		X
	Cutting department		X		
	Expedition		X		
	Cutting		X		
	Maintenance		X		
	Maintenance		X		

	Slaughtering manager		X		

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

Document control			
CB Report number	RQA9732086 job 6040414		
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
2.1.1	HACCP team is described in P-TIL-NL-10129 but team is not actually meeting. Production Team has taken over these tasks but not demonstrable that all specific knowledge is in the team present.	VION Tilburg HACCP team-related procedure P-TIL-NL-10129 has been amended in per 23-04-2024 in which demonstrability of specific required knowledge of members is clearly stated/formulated and methodology /frequency of consultation is better specified. See evidence minor 1.A	Implementation of action described in column correction whereby during next HACCP / work consultation this procedure is reviewed and then will be applied as approved working method. This decision is recorded in the minutes of this consultation.	The team does actually meet and the minutes are shown to auditors. The HACCP team and the functional positions present in it with their specific HACCP knowledge are also part of the team work meeting, which meets at least once every 14 days and also takes minutes on HACCP issues. Merging HACCP team/elements and discussing them in the work meeting was a purely practical solution to generate a in practice wider support field with production. The whole	2024-04-29	

Minor						
				thing was not included in procedure P-TIL-NL-10129. Also, mentioning specific members was not correct.		
3.6.2	Form for product specification of end product is not authorised, has no version number, has outdated information. Seen specification article dd 05-4-2023. System to generate correct end product specifications not demonstrable.	Specification article dated 05-04-2023 has been revised as to content (after consultation and update procedure management customer specifications and format specifications with QA VION centrally). Subsequently this specification through authorisation (with version number and date), released by commercial end responsible. See evidence minor 2.A	Procedure P-TIL-NL-10117 Procedure management customer specifications ir has been adapted to better manage/control the management of specifications. This includes how VION Tilburg assesses, manages and communicates product specifications and external customer specifications. In addition, a format has been designed for VION Tilburg's own specifications, which can be used by both QA VION central and the VION Tilburg sales department. In the future, VION Tilburg	VION Tilburg's digital quality system contains Procedure management customer specification P-TIL-NL-10117. This was unknown to many commercial and production stakeholders. This procedure describes the correct use and management of both VION Tilburg and client specifications. All heads of the various departments are demonstrably users of the digital quality system in which this procedure is included.	2024-04-29	

Minor						
			specifications will only be drawn up in English. Those responsible will receive demonstrable training and must conform to this procedure. See evidence minor 2.			
3.7.1	Completion of RCA not present in procedure on preventive and corrective measures (P-TIL-NL-10088 v 21-1-2009. Created Action list and form F-TIL-NL-10170 do not lead to rca. RCA is not correctly applied on a minor in internal audit dd 17-11-2023 as seen that form for correction is used as form for training registration which is not correct.	Rounding cause analysis (RCA) is included in relevant procedure P-TIL-NL-10088 and document F-TIL-NL-10170. See evidence minor 3.A	Updated procedure P-TIL-NL-10088 'Procedure Corrigerende en preventieve maatregelen' and form F-TIL-NL-10170. 'Registratie verbeteractie'	Cause analysis is not structurally applied in accordance with BRC requirements. Possibility of using cause analysis structurally as part of improvement management is insufficiently used because staff are too much production-oriented and/or underestimate the usefulness and requirements of their administrative tasks/obligations, including cause analysis.	2024-04-29	
3.10.1	Complaint on stinky fat of a customer in November 2023 is booked on category	P-TIL-NL-10229 procedure on complaints is reinstalled.	Start implementing and recording complaints processing as per modified procedure.	The complaint handling procedure (of VION Central and VION Tilburg) are not communicated,	2024-04-29	

Minor						
	3099 (no food safety). Complaint is analysed but result and count not taken up in count and trend. Not demonstrable that complaints via WhatsApp all are taken up in the analysis and overviews. Not demonstrable that coding can be corrected if wrongly booked.		See evidence minor 4.A Responsible persons are still demonstrably trained and must conform regarding compliance with this procedure.	used and applied as such by department of commerce, QA. As a result, complaints are not always correctly reported and booked to VION Tilburg by customers. Subsequently, no structural administrative route regarding pre-screening/ assessment, allocation, analysis and response towards the customer within VION Tilburg.		
4.5.2	No schematic diagram of water distribution system is available with tap-points for water-analysis. Not demonstrable that and which points are analysed 2x per year as indicated in procedure P-NLFOOD-10032.	Department QA is going to ensure by Q2 2024 that water samples are taken in accordance with P-NLFOOD 10032 (based on information current at TD Tilburg regarding water distribution system). (This means that ice machine and cattle shower will be periodically examined in addition to the taps required by NVWA).	Order by email from branch manager to manager Technical Services that he will demonstrably resolve this minor within set timeframe and thereby start meeting BRC criteria. See proof minor 5B.	This BRC requirement has been known to the technical department for some time, but until now, a full update has never been carried out because parts of the building date from 1926. Many changes have taken place throughout history and in recent decades, but not all of them have been archived. An update order	2024-04-29	

Minor						
		See evidence minor 5.A1 and 5A2		will have to be reported/applied for as a cost/investment and approved by VION headquarters.		
4.7.1	Greasing instructions not demonstrable. Not verifiable what machinery is to be greased with which grease. No overview of food grade greasing demonstrable. Ultimo application not correctly filled, data not available.	Drawing up a controlled procedure lubrication instruction by technical service, including an overview of machine type, type of grease and frequency of how this should be carried out and monitored.	Order by email from branch manager to technical services manager that he demonstrably resolve this minor within set timeframe. See evidence minor 6.	Technical service The technical department has never implemented this BRC requirement in the past. They	2024-04-29	
4.9.1.1	No updated and correct list of chemicals on site present. Found several chemicals present not available in the overview presented (list not authorised). Missing is and (both H1/NSF). application not available during the audit.	Preparation of an authorised list of total chemical substances by technical services and human resources departments.	Order by mail from branch manager to Technical Services and Human Resources managers that they demonstrably resolve these minors within set timeframe and thereby start meeting BRC criteria. Keeping current, periodically monitoring and verifying the list	Technical service / HR (ARBO) Have not properly implemented this requirement from BRC in the past.	2024-04-29	

Minor						
			mentioned under correction. See evidence minor 7			
4.10.3.4	Metal detection applied on packing line 3 and observed that method for release is not correctly applied and not (correctly) instructed P-TIL-NL-10061 . Reset option to be applied by all and no instruction on method of testing (order, with or without product, on or in product, etc).	During audit, the foreman concerned was told directly that his method of reset release was not allowed. The machine must not be set up (or allow it to be set up) in such a way that resets can be performed by other unauthorized employees without the use of keys by supervisors. Key use here means restart after each detection and/or monitoring.	The procedure regarding metal detection has been substantively modified regarding reset description, sequence and methodology of product testing, and disinfection of test equipment.... Related employees have been demonstrably instructed on this. Blocking current possibility of escaping reset by technical adjustment technical service or supplier is further considered by Branch Manager. See evidence minor 8A and 8B.	The cause of this deviation regarding reset is due to the fact that technical update/placement did not take into account this requirement (from BRC/food safety). In addition, the QA department was unfamiliar with this technical application used.	2024-04-29	
7.4.1	Personal hygiene instruction is not strict enough as seen lockers used wrong (on storage of which items where) without correction and seen	Immediate corrective action regarding cabinet use during second audit day. All cabinets are cleaned weekly but too little attention to daily monitoring regarding desired storage and use. After	Cabinetcontrol is in place and hygiene is topic. Instructions to employees will be repeated coming months. See evidence minor 9.A and 9B	The VION Tilburg instruction regarding cabinet use is apparently not clear enough (instructed/applied) regarding prohibition and/or does not address	2024-04-29	

Minor						
	PBM/Malienkolders worn over hygienic company clothing.	observation PPE use over company clothing during audit also there immediate correction but a structural solution should be implemented.		the need for safe and **locked** storage of personal food items. Employees in the slaughter hall, without intervention from their management, proceeded to unhygienic wearing of PPE		

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**
20485	Ans	Van Bergen

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
[redacted]			Auditor	2024-04-08	08:30	16:00	P	
			Auditor	2024-04-09	07:30	16:00	P	
			Auditor	2024-04-10	08:30	16:30	P	

1. Senior management commitment

Policy
The site policy is documented in: Policy dd 31-10-2023 by
It is signed by the person with overall responsibility for the site.
Commitment to continuously improve the site's food safety and quality culture is included.
Communication to staff: Displayed in key areas on notice boards and part of induction program new employees.

Product safety and quality culture plan
The level of culture at the site is identified by introducing and implementing a plan for the development and continuing improvement of a food safety & quality culture. Culture aspects are clearly communicated through various channels (policy, induction program, annual newsletter).
The culture improvement plan is documented in: the management assessment plan
Activities undertaken, involving all sections of the site: personnel survey, workshops, year-end meetings with personnel, food safety training, whistleblowing policy, sign up to business code of conduct.
Success of the plan is measured through monitoring of actions taken during management meetings. Tier 1 boards show current performance against the objectives for the benefit of the staff.
Plan is ongoing. During this audit, the implementation of this plan was also verified on the factory floor and all other departments that were audited.

Date of last review of plan: **02/04/2024**
Frequency of reviews: 4x per year
Senior management were able to discuss the plan during this audit (spoken to Operational Manager).

Food safety and legality objectives
Notable food safety and quality objectives include:

- **Cost and amount of returned goods**
- **number of food safety complaints number of product integrity complaints per 100,000 kg, with targets of 0,2**

Objectives are monitored 4x per year by MT
Key results or significant trends: the site is meeting established objectives / effectively progressing through its objectives.

Management review
Frequency of management review meetings: 4x per year. All required items are discussed as these are fixed tabs in the excel sheet managed by HQ. EG on FSQC-plan, returns and complaints, microbiology, audits, and other topics.
Who typically attends the meeting: PT Production team of 8 persons
Date of last management review meeting: **02/04/2024**
How minutes and actions are communicated to staff and recorded: Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status.

Regular meetings
Routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed.
The structure is documented.
How minutes and actions are communicated to staff and recorded: emerging actions are discussed in the Tier meetings (1-5) with Tier 1 held with operatives daily and Tier 2 with line management weekly.
Minute meetings reviewed: **10/07/2023**, **03/04/2024**

Previous nonconformities
All previous non-conformities have been closed out suitably.
Thorough root causes are identified through application of a 5-Why/Fishbone diagram. Preventive actions are effectively implemented to prevent re-occurrence. A CAPA excel list is maintained.

Organisational structure, responsibilities, and management authority
The site organization structure is documented in: **3 documents dd 19-01-2024**
Management structure:
The senior management has appointed qualified employees for key functions. Responsibilities and competences are detailed in job descriptions. Employees in key functions and the members of the Incident Management Team are announced in the production site. Also, Members of the Food Safety Team are announced. Substitutes have been clearly appointed in case of absence of the responsible person.
Current structure and reporting are up to date.
External expertise is used (consultant). This consultant supports the internal audit programme.
Overall responsibility for the day-to-day management of the food safety system is with the Operations Manager and Distillery Manager (deputy).

Reporting food safety issues
How food safety risks, concerns or non-conforming issues are reported by staff and resolved:
Feedback from personnel on factory floor demonstrates that staff is aware when, how, and to who report food safety issues to. The company keeps up to date with emerging issues, legislation, and good practice through branch organization and consultant.

A whistle blowing system is in place, where a box is placed within the rest room and employees are free to leave anonymous concerns. The Operations Manager is responsible for monitoring and cascading this to the relevant stakeholders across the site.

BRCGS standard is available onsite in the QOL manual.

The following supporting evidence was reviewed:
- X-matrix with objectives dd 2-4-2024
- Management review with HACCP assessment over Q3 and Q4 2022 and Q1, Q2 2023
- Management review with FSQCulture plan over Q3 and Q4 2023 and Q3 2024
- VION app with whistle blowers' arrangement

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

2. The Food Safety Plan – HACCP

There is one HACCP manual described as the: **application**

HACCP Team

The food safety team is detailed in: **P-TIL-NL-10219**
The team leader is well qualified and experienced. The team is multidisciplinary, experienced, and knowledgeable in their fields with required level of food safety training. The HACCP Team is led by the 'Chair' Technical Manager who has more than 20 years' experience in the food industry and trained in HACCP. The other members all had appropriate training and experience. Training records were sampled. Training records were sampled. HACCP team is integrated in Production team and does not have same cast, for this a minor is raised.

Scope of HACCP
The HACCP system scope is documented in: **P-VION-10000**. It covers relevant processes and all products on site.
Vulnerable groups have been identified. Product is suitable for regular consumer groups.
Product descriptions are detailed in: **P-VION-10000**. Relevant information is described and information on food safety is included.
The scope accurately reflects all products on site.

Process flow diagram
Record key process steps/operations to manufacture products within the scope of certification:
Receipt of cattle, receipt of packing material, storage, slaughter, cutting, packing, storage and dispatch.
Yearly verification of all process flows by thodology of authorisation and verification. The flow diagrams accurately reflect the production processes

Record date and reason of last verification: **11/05/2023**
Flow-diagrams are maintained and signed as verified by members of the HACCP team; all were reviewed during the HACCP review.

Hazard analysis
HARA is based on comprehensive information sources**.**
Severity vs likelihood is considered.
Outline hazards considered specific to each process step:

- An assessment is made of microbiological (main risks Salmonella, STEC, Listeria), chemical (main risks heavy metals, pesticides, PFAS, PCB, dioxines, veterinary residu's, the allergen milk is acknowledged due to slaughtering of cows/presence of udder), radiological and physical (metal, plastic) risks for all steps in the production process, packing material

CCPs, limits and controls
Provide CCPs / PRPs details:

#	CCP	Control measure	Critical limit	Monitoring frequency
1	Faecal contamination of carcasses, zero tolerance for visible faecal contamination just before the carcass cooling step. There is a daily verification of this CCP on the 5 last carcasses of the day. Monitoring is done at the end of the slaughter process	Visible detection faecal contamination	zero tolerance for visible faecal contamination just before the carcass cooling step	Formal monitoring is done on 5 carcasses at least 4 times per day.

2	Temperature control of cooled (vacuum) packed beef and by-products at dispatch (expedition). This is measured on every dispatch of product in the product reception / dispatch area	Thermometer	Core temperature of beef <7ºC, intermediate surface contact temperature of vacuum-packed cooled beef <6ºC, core temperature of animal by-products <3ºC, surface contact temperature of vacuum-packed animal by-products <2ºC	Every Dispatch, several (minimum 3) times
3	Temperature control of externally slaughtered cattle (carcasses/beef) of approved suppliers	Thermometer	Core temperature of beef <7ºC intermediate surface contact temperature of vacuum-packed cooled beef <6ºC, core temperature of animal by-products <3ºC, surface contact temperature of vacuum-packed animal by-products <2ºC.	every receipt.
4	Removal of spinal cord at the slaughter department	Visible detection on cutting the vertebral column	Zero tolerance for visible spinal cord or husks of spinal cord just before the carcass cooling step	monitoring is done on 5 carcasses at least 4 times per day. There is a daily verification of this CCP on the 5 last carcasses of the day. Monitoring is done at the end of the slaughter process;
5	Transport and reception of partially chilled beef quarters conforming (EU) 2017/1981 with transport time of maximum of 6 hours.	Thermometer	Surface temperature <7ºC, travel duration less as 6 hours	This is measured on every reception or dispatch of product in the product reception / dispatch area.

PRPs have been identified in: **P-TIL-NL-10127 Procesbeheersplan**. Control measures have been defined. This includes approximately 30 OPRPs as condense control, knife and sharps management, metal detection, calibration of weight scales, traceability, packaging control.

Examples of corrective actions:
Actions when monitoring level exceed acceptable limits are documented within the HACCP plan, recorded and investigated. Based on live demonstrations and records checked during this audit all CCPs are in control conform the work instructions. (NB CCP3 and CCP5 currently not in operation.)

Validation, verification and review:

The company has effectively validated and verified the HACCP/Food Safety Plan, including the critical limits, control measures and PRPs specific for controlling food safety hazards. Procedures of verification have been established.

Procedures include performing internal audits, review of records where acceptable limits have been exceeded, review of complaints (by enforcement authorities or customers), review of incidents (of product withdrawal or recall).
Documentation and record keeping is verified.
Results of verification/validation are recorded and communicated to the HACCP food safety team.
Validation was sampled for the CCPs.

Frequency of planned HACCP system review (at least annually): annual
Date of last review: **10/07/2023**
Completed by: QA manager and PT
Reason for completion: **annual verification**

The following supporting evidence was reviewed:

- P-TIL-NL-10127 Procesbeheersplan
- Flow docs: F-TIL-NL-100158 Packaging

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

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

The Food Safety & Quality Manual with department specific work instructions are available on the network ( ) and at point of use as demonstrated throughout the audit. All procedures and work instructions are in Dutch. Several in up to 7 languages or with pictures. Interpreters are available should they be required. Documentation seen is up to date. Only QA can make the changes into the system. Changes are indicated in the procedures in a yellow colour.

All documents seen during the audit were complying.

There is also a manual of the HR management with documents and procedures concerning HR.

Record completion and maintenance

Records are in good condition and retrievable electronically or on site. Records retained as a minimum for the shelf life +3 year.

The following supporting evidence was reviewed:

-
- for training records
- for Maintenance
- for slaughtering management

3.4 Internal audits

The following document(s) define the process: P-VION-10011 Internal audits
The audits generally follow BRCGS guidelines and clause structures.

Internal audits are conducted: in a rolling pattern 4x per year on food safety. The programme includes at least four different audit dates spread throughout the year and is risk-based, considering any previous audit findings.

Internal audits are performed by: QA managers from other sites or from HQ (to maintain independency).

Auditor competency has been demonstrated through training records, sufficient knowledge of the products and processes and experience.

Internal audits are reported in fixed formats with annexes per scheme. BRC is annex 3 to the audit report. Objective evidence of compliance and non-compliance are reported. The audit criteria are clearly referenced. Findings are included in a central log, monitored for follow-up, and evaluated in management meetings. Follow-up actions include immediate correction, root cause analyses and corrective action. Responsibilities and timescales for verification/closure of findings have been defined.

Internal audit reports reviewed during this audit: 27/11/2023, 18/12/2023
The reports reviewed detail conformity as well as non-conformity. A few minor nonconformities have been raised with no trends identified. Root cause by is not sometimes not sufficient for which a minor in 3.7 is raised.. All actions were closed within the due date. Audits contained a moderate amount of detail.

A separate program of internal inspections of factory environment and processing equipment is undertaken daily by SSOP and Pre-SSOP.

This is reported in: a excel list PRE-SSOP and SSOP monitoring.xlsx after a minor on this topic past year. Inspections are performed by using a checklist which includes a clear action list. Performance is measured based on a scoring system and link to a KPI. Actions in response to deviations are recorded, cascaded to team leaders for follow-up, and discussed in production team meetings. Completion of actions is verified upon the next inspection. Effectiveness of the system is discussed in the Management Review.

Inspection report reviewed during this audit: 12/01/2024. A few minor issues had been observed. Follow-up of actions is demonstrable with records.

The following evidence was reviewed:
- Procedure P-VION-10011 Internal audits including the planning
- Results of internal audits and inspections in the management review
- Internal audit reports dd 27-11-2023, 18-12-2023
- Pre SSOP and SSOP of 11 and 12-01-2024, the day of the trace test example.
- Verification list of all PRE-SSOP and SSOP inspections
- Action list of findings in all audits

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The company's risk assessment is documented in: P-NLFOOD-1055 Management of suppliers of raw material, services and packaging. The approval procedure is also documented in: P-NLFOOD-1055 Management of suppliers of raw material, services and packaging. Categorisation is in place but no suppliers indicated as high.
Procedure is found to be suitable and effective.

All potential risks have been appropriately considered.
Significant risks on farms include healthy cattle which is handled by sister company as they are in contact with farmers, traders and transporters.

The risk assessment forms the basis for the raw materials acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.

List examples of suppliers reviewed during this audit:

Name/Initials supplier	Supplier of:	Method of assessment	Evidence seen
Vion Rundvee	Cattle	Daily contact	Manager joint the audit
	Primary Packaging Material	Yearly on criteria as GFSI certification	Taken up in the review, GFSI certificate available

All suppliers are evaluated: Yearly
Suppliers are rated on quality, service, delivery, and complaints. All suppliers graded satisfactory in the past year.

Traceability system is verified through: GFSI certification of the manufacturer, I&R system of the Dutch Authorities on cattle management.

Handling exceptions and absence of information is considered in the supplier approval procedure. Exceptions can be made on supplier status and when information is not available straight away. But this should be fixed within 3 days otherwise the supplier is taken of the approved supplier list and blacklisted.

The following supporting evidence was reviewed:

- All cattle is supported with VKI document
- GFSI certificate

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 visually checked with authority of Dutch NVWA. Other than cattle is accepted based on risk assessment, food safety hazards are controlled through COAs, internal analysis etc. Samples have been taken (see below).

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

The following evidence was reviewed:
- Packaging bags from with DOC

3.5.3 Management of suppliers of services

The following services are used:
- Pest control
- Maintenance
- Laundry services
- Contracted cleaning
- Temporary employees

Approval and monitoring for ongoing performance are described in the company's supplier approval procedure (referenced under 3.5.1). Service suppliers (based on risk assessment) are evaluated annually.

Contracts are in place that clearly define service expectations. Food safety aspects are appropriately addressed.

Examples assessed during this audit:
- Contract with Pest manager

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

Quarterly management reviews include performance of suppliers of services.

The following evidence was reviewed:
- Contract with dd 18-12-2019
- certificate valid until 10-01-2025

3.5.4 Management of Outsourced processing

Outsourced process steps to a third-party or undertaken at another site is: **not applicable**

3.6 Specifications

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

Specifications are held and access is restricted to the production team.

Specifications include limits for relevant attributes (relevant chemical, microbiological, physical and allergens). Key data is included to meet customer and legal requirements and to assist the user in the safe usage of the product.

During the audit, several specifications were reviewed:

- Raw material: VKI for cattle delivered on
- Finished product: art dd 5-4-2023
- Packaging: HDPE bags from with Doc dd 22-9-2022
- Lubricant:

See minor as not all were seen to be clear and accurate.

Frequency of review of specifications: at least every 3 years or if changes occur.

Minor: Form for product specification of end product is not authorised, has no version number, has outdated information. Seen specification article dd 05-4-2023. System to generate correct end product specifications not demonstrable.

3.7 Corrective and preventive actions

Procedures are in place for handling and correcting issues identified in the food safety and quality management system. This is documented in: P-TIL-NL-10229 Corrective and preventive actions and P-TIL-NL-10088 Corrective and preventive actions

Identified issues are logged in: the site has 3 CAPA lists, depending on meeting group (MT, PT, QA) which are all Excel overviews.

During this audit, several samples were taken to verify effectiveness of corrective and preventive actions. Thorough root cause analysis is performed by the Production team. A correct solid system not yet identified and very occasionally as a minor is raised on this issue.

This approach is applied for: internal audits findings, nonconformities raised by external audit bodies, complaints and found to be suitable and effective. It meets the expectations of the BRCGS standard (i.e., section 3.7)

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

Actions and status of CAPA list are discussed during: HACCP meetings.

The following evidence was reviewed:

- Xlsx with actions from audits
- Xlsx with actions from Production team

Minor: Completion of RCA not present in procedure on preventive and corrective measures (P-TIL-NL-10088 v 21-1-2009. Created Action list and form F-TIL-NL-10170 do not lead to rca. RCA is not correctly applied on a minor in internal audit dd 17-11-2023 as seen that form for correction is used as form for training registration which is not correct.

3.8 Control of non-conforming product

Control of non-conforming product is detailed in: P-TIL-NL-10xxx Handling of waste and categorised material

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

Corrective and preventive actions are described in several work instructions (see previous section). Clear process which is well understood by staff that was interviewed during the audit.

Non-conforming products are physically segregated and discard according to defined categories Cat1, Cat3 and waste. There is a segregated section in the warehouse for returned goods.
Responsibilities regarding release of products on hold lies with Dutch NVWA and also follows a clear decision-making process.

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

Example seen of non-conforming product incident: slaughtering process in which segregation of categorised material is correctly applied.

The following evidence was reviewed:
- Area for returned goods in the storage cell.
- Identification of bins for Cat1, Cat3 and grey waste

3.9 Traceability

The traceability process is documented in: P-TIL-NL-10087 Traceability and P-VION-10015

Traceability through the process:
Traceability system operates through cattle identification per animal, application is in place.
Recording of batch information per batch of packaging materials, on the production record sheets (as reviewed for vertical audit).

Traceability marking on products:
LOT codes are printed on all raw materials, intermediate/semi-processed products, part-used materials, finished products and materials pending investigation which enables retrieval of all required data.

Traceability test details company:
Frequency: yearly
Last test conducted: 14/03/2024
Product couple slaughtered 8-3-2024:
Lot code: na
Results are retained as documented information and reports include all relevant information and data (including mass balance information). Traceability is achieved within 4 hours.

Vertical audit details:
Finished product: art
Raw materials: Slaughtering dd
Printed packaging and labels: na
Production/packing date:
Quantities reconciled:

Key documentation reviewed including process control and quality control documentation:
Quantity control, pre-SSOP forms, SSOP-form, CCP1, 2 and 4 control, knife count forms, microbiological and chemical analysis results

Summary traceability and vertical audit:
Fast tracing (forwards/backwards) including packaging was possible in the records/system. Rework is not used. No product in stock, 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 CCPs and PRP's, delivery control checks, production checks, calibration and analyses were verified too. Time to perform the test was respected (<3h). 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. The company's traceability system is found to be effective.

3.10 Complaint-handling

Complaint-handling is documented in: P-TIL-NL-10229 Complaint-handling
Follow-up of complaints is managed through: Complaints are handled centrally using the system and complaints from B2B come in per mail and WhatsApp. Investigations are completed by the site. Corrective actions are carried out promptly and effectively.
Product complaints:
2022-2023: complaints on food safety in over 10 categories: plastic, smell, microbiology, temperature, etc
Top 3 complaint reasons:
1. Sensoric/smell
2. Foreign bodies/plastic
3. BBD/Old

A trend analysis is maintained and documented and discussed in management meetings (including the management review).
There has been no significant increase in a complaint.

The following complaint samples were taken:
- Complaint overview in the management review 2022-2023 and 2023-2024 including returns

Minor: Complaint on stinky fat of a customer in November 2023 is booked on category 3099 (no food safety). Complaint is analysed but result and count not taken up in count and trend. Not demonstrable that complaints via WhatsApp all are taken up in the analysis and overviews. Not demonstrable that coding can be corrected if wrongly booked.

3.11 Management of incidents, product withdrawal and product recall

The company has procedures in place to report and effectively manage incidents and potential emergency situations that impact food safety, authenticity, legality, or quality.

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

There is a documented product withdrawal and product recall procedure: P-VION-10015 Management of incidents, product withdrawal and product recall.

The recall procedure identifies those who are to be notified (including CB,) in the event of an incident where product safety or legality is in question. There is a recall plan which is supported by a recall

checklist. Mobile phone numbers for the senior management team are available for out of hour's emergencies. Recalls are categorised as critical (food safety, allergens, FBs, health, pest, and legislation) and non-critical (quality, coding and packaging).
LRQA is referenced as contact, indicating that incidents/withdrawal/recalls shall be reported via the website within 3 days of the event.

No withdrawals/recalls occurred since the previous visit.

This was notified to LRQA on: na
Corrective actions found to be effective. na

Date of last incident management procedures test: 14/03/2024
Type of test completed: recall/withdrawal/incident.

Mass balance information is included in the report. Traceability is achieved within 3 hours. Successful test conducted. No improvements have been required as result of the outcome.

The following evidence was seen:
- Evaluation report of the recall test dd 14-03-2024
- Minor of last year on this topic.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.4.	There is no outsourced processing
3.9.4.	No rework

4. Site standards

4.1 External standards

Plant located in an industrial area in a rural environment.

Site boundaries are clearly identified. Premises is fenced off with security gate access to the facility.

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

Site security:
Unauthorised access is prevented by use of badges. Visitors/contractors must register at the security building and request for a badge. Several CCTV cameras are installed.

Supervision by porters. Truck drivers (cattle and other) need to report to the porter before they can enter premises and will be supervised by staff. The company is always guiding the visitors while visiting the production areas.

Water break tanks are in place and locked when not in use. This was checked during the audit outside tour. Access to these tanks is controlled through the site key plan.

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

The following evidence was reviewed:
- Badge system on entrance
- Reporting system on entrance
- Outside tour: all fenced and gated.

4.2 Site security and food defence

The team completing threat assessments and food defence plans have the appropriate knowledge. The Team is also the site HACCP team. Awareness training was seen for team members.

There is no legal requirement for specific training.

Food defence risk assessment is documented and based on TACCP: P-FOOD-10051

Risk score calculation based on impact and likelihood of occurrence. The threat assessment includes both internal and external threats. The site has established a documented food defence plan covering assess points and controls.

Examples of threats that have been determined unauthorised visitors and personnel and temporary contractors.

Appropriate control measures are developed and implemented: CCTV cameras installed, badge system for visitors and temporary contractors.

Access is via key coded doors and keyed locks. There is a gate that can be used outside of normal operating hours and during opening hours watched by porters. Security training is included for all staff as part of the HACCP induction to site.
Beef storage areas are controlled and key locked. No external intake points.

The following evidence was reviewed:
- Key plan with numbers and sorts of keys available and handed out.
- Daily opening and closing of beef storage cells on F-TIL-NL-167

4.3 Layout, product flow and segregation

A lay out map with flow of processes and movement of personnel is present, including zoning. This is documented in several maps. There are three large parts on the production site. The first part contains the live animal stable and slaughter part, the second part is the cooling of the carcasses and finally there is a cutting part in the plant. There is 1 slaughter line and carcasses are automatically transported to the cooling areas. From there on, there is 1 main cutting line to cut the carcasses into quarters. Once this is done, there are three possible finishing lines for technical pieces, one line for meat cuttings and some smaller machines for grease collection and some minor products. In the slaughter area, the intestines are sent to a specific area, where there is a cold and a warm cleaning line. In the cutting area, the offal is collected and sent to a specific area for further collection.:

Production risk zones (based on BRCGS Annex 2):

- Open product areas: (all low-risk production zone identified due to processing of raw beef)
- Enclosed product areas: warehouses and storerooms
- Non-product areas: canteens, workshop, offices

Contractors and visitors, including drivers are informed of the requirements for the areas they are visiting through hygiene rules, placed on walls and to be signed in contract or during visit (visitors and contractors).

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

The following evidence was reviewed:
- Map on entrance with zoning and clothing and safety instructions per zone

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

Building materials were in good condition. Smooth cement floors, walls, and ceilings from metal cladding.

Condition of building was acceptable. No deteriorated doors or gaps evident. No suspended ceilings and internal drains.

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

No 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.

Plastic strip curtains present.

The following evidence was reviewed:
- Well managed conditions observed

4.5 Utilities – water, ice, air and other gases

Water is used as: rinsing and cleaning, for ice production for cooling stomachs

Source(s) of water supply:
- Municipal/city (cleaning, handwashing)
- In-house treated (Yes. Descale system installed to prevent equipment damage)
- Storage or holding tanks (demi-water)

Only potable water is used.
Microbiological or chemical testing is undertaken: 2x per year (but not demonstrable for 2023: see minor)
Water testing is completed to ensure the requirements are met. Analysis reports for chemistry are completed from the water company ' ” via compliance checks and microbiology via an accredited external laboratory.

A water system distribution schematic diagram is partly available, including holding tanks.

Sampling points include carcass rinsing water, canteen water, water for ice production

Gas used in packaging: N
Compressed air used: Y
Purpose of compressed air use: blow up beef for easier cutting
In direct product contact: Y
Filtered at point of use (when in direct contact): Y

Checks are done on filter replacement as part of the preventive maintenance program. Filters are to 1 micron.

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

The following evidence was reviewed:
- Area with water holding tanks and tap points,
- Maintenance department with detailed schematic overview of processing water (maintained by external company).

Minor: No schematic diagram of water distribution system is available with tap-points for water-analysis. Not demonstrable that and which points are analysed 2x per year as indicated in procedure P-NLFOOD-10032.

4.6 Equipment

Key production and product-handling equipment include stables with automated animal welfare state of the art cattle pushing system, slaughtering line, intestines line with stomach cleaning, chilling equipment, cutting lines with several meat equipment, packing lines with up to 8 vacuuming machines, fat% detector on X-ray, 4 metal detectors.

Equipment is suitable and designed for the intended purpose, mostly stainless-steel construction.

Line equipment is sourced through procurement, specified, tested, and commissioned before use.

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

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

Equipment is made of stainless steel. Conveyor belts are food grade. lines used for product transfer are registered as FDA compliant for food contact.

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.
The following evidence was reviewed:
- Highly capitalised and robust equipment with daily robust cleaning. No new equipment commissioned past year. Stable is still in finalising process: pushers are still to be installed.

4.7 Maintenance

Preventative maintenance
Maintenance management system: Application Ultimo recently installed maintenance system used for PPM work.
Frequency of main checks: weekly, monthly, quarterly, and bi-annual PMs are completed.
Notable equipment includes stables with automated animal welfare state of the art cattle pushing system, slaughtering line, intestines line with stomach cleaning, chilling equipment, cutting lines with several meat equipment, packing lines with up to 8 vacuuming machines, fat% detector on X-ray, 4 metal detectors.

Preventative maintenance covers all plant, processing equipment and mobile equipment.
Contractor services are used for: multiple activities including weighing scales and metal detectors.

Plans are downloaded along with relevant job sheets. Once completed they are put into the system.

Samples seen and completed to schedule.

Inspection of equipment condition
Inspections for damage and wear are completed for: conveyor belt condition, daily checks on sterilisation water temperature >82C. .

Temporary maintenance
No temporary repairs observed.

Handover
Suitable handover processes were in place after maintenance work to eliminate foreign matter risks generated. On SSOP forms per department used; seen for slaughtering line on second audit day, sign off by foreman.

Lubricants
Range of food grade lubricants used. MSDS with compliance to NSF H1 and Allergen Declaration seen (list not complete, see minor in 4.9).

Overall cleanliness engineering workshop
The workshop was well maintained and away from the production, access via outside, no direct access into production areas. There is also a dedicated rest room, changing room and wand wash present.

The following supporting evidence was seen:
- , not completely installed yet as , was former application but not yet supported anymore.
- Workshop inspection with locked area with greasing and chemicals

Minor: Greasing instructions not demonstrable. Not verifiable what machinery is to be greased with which grease. No overview of food grade greasing demonstrable. application not correctly filled, data not available.

4.8 Staff facilities

Changing facilities
Designated changing facilities for staff in place that are appropriately sited. Several areas with these facilities present. Most areas have sloped lockers for storage of outdoor clothing, and a separate area for protective clothing. In the new area found some inconsistencies, see minor in 7.4.

Workwear is laundered externally to a defined process and brought to site in a separated container. Captive site shoes are stored in the work-wear locker when not in use.

Handwashing
Several hygienic sluices with hands-free operable handwash facilities located at entrance to production, equipped with an adequate supply of water delivered at a suitable temperature, soap and drying facilities. Advisory signs for prompt handwashing are displayed above the sinks.

Toilets
Toilets provided do not open directly into production or packing areas. Adequate hand-washing facilities are provided within toilets conform 4.8.5.

Catering facilities
Multiple rest room areas for food storage and eating; several catering facilities in place. There are also vendors for food and drink. Staff fridges were seen to be clean and maintained.

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

4.9.1 Chemical control

An approved list of chemicals is not available and but to be documented in applicatior.

Chemical containers including cleaning chemicals are clearly labelled and separately stored in secured compounds.

Safety Data Sheets / specifications are available, and samples have been taken: all cleaning chemicals supplied by ., available on internet.

All chemicals as sampled are suitable for the intended application.

Waste handling and spillage control is effectively managed.

Minor: No updated and correct list of chemicals on site present. Found several chemicals present not available in the overview presented (list not authorised). Missing is and oth H1/NSF). application not available during the audit.

4.9.2 Metal control

Several types of sharp metal equipment are used: knives, blades, saws. No snap-off blades used.

There is a knife regime and a procedure for guidance with daily counting and recording in place.

Condition and integrity are monitored: by daily hygiene inspections; see section 3.4.4 for details.

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

4.9.3 Glass, brittle plastic, ceramics and similar materials

Monitoring of glass/brittle, plastic and ceramic items is done through monthly hygiene audits.
Records were seen for: all areas in the trace test day (12-01-2024)

Besides monthly audits, inventory is checked daily via pre-SSOP.

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) in and near open product areas. Wooden pallets used in storage areas were observed to be in good condition. Some packaging may be delivered on wooden pallets.
4.9.6 Other physical contaminants
Other specific controls on physical contamination such as packaging: Deboxing and debagging procedures include controls for physical contamination. Plasters are all blue and metal detectable. Management of portable handheld equipment: Metal detection is used. Single piece biros are used with no small parts evident. Other types of control for contamination not covered in section 4.9 are not required.
4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
Detection equipment (metal detection) is installed as result of the risk analysis mainly to protect equipment and is controlled as OPRP. The sensitivity of control measures is appropriate as determined through validation study. One x-ray is used but for fat% and not for foreign body contamination removal. Escalation procedure in place in case of breakdown incidents. Detected foreign materials are evaluated and analysed by QA. Past year 8 complaints on metal and 45 examples of foreign bodies detected recently. The following evidence was reviewed: - 4 metal detectors in use and 1 x-ray equipment
4.10.2 Filters and sieves
No filters or sieves used.
4.10.3 Metal detectors and X-ray equipment
Metal detection is used mainly for equipment protection. Detection equipment not installed as result of the risk analysis and controlled as CP. Monitoring frequency: beginning/end of the day, every 2 hours and between breaks.

Metal detection verification is performed through test sticks. The testing procedure is found to be suitable. But a minor given on not correct instruction.

Corrective actions are clearly defined in the control plan. Data is maintained in documentation. The sensibility of the detector is justified. A stop and alarming system is in place.

Metal detection was tested during this audit. Operation to be improved was observed, see minor.

In case of detection of foreign body contamination, the material is analysed by QA.

The following evidence was reviewed:

- Test pieces on packing line: 10 mm SS, 10 mm Fe, 10 mm Bs.

Minor: Metal detection applied on packing line 3 and observed that method for release is not correctly applied and not (correctly) instructed P-TIL-NL-10061 . Reset option to be applied by all and no instruction on method of testing (order, with or without product, on or in product, etc).

4.10.4 Magnets

Magnets are not used.

4.10.5 Optical sorting equipment

Optical sorting equipment is not used.

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

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

4.10.7 Other foreign-body detection and removal equipment

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

4.11 Housekeeping and hygiene

Cleaning is performed by external company and own workers.

Documented cleaning and disinfection procedures are in place and maintained for the building, plant and all equipment. Cleaning procedures seen included: in the manual of external cleane

Cleaning methods described are found to be suitable.

Cleaning records were reviewed in both the traceability exercise and on the factory inspection with no issues noted. Cleaning records detail the cleaning requirements stipulated in clause 4.11.2.

Cleaning is monitored through audits and chemical/ residue and microbiological testing. And monitoring via amount of detergent used. Also a dedicated employee is installed to guide the daily cleaning operations.

Limits of acceptable and unacceptable cleaning performance is defined for food contact surfaces and processing equipment: visual inspections.

Areas visited on the factory inspection were observed to be clean and tidy.

The following evidence was reviewed:

- Microbiological testing on Listeria and on TPC for cleaning monitoring.

4.11.7 Cleaning in place (CIP)

CIP is not applicable.

4.11.8 Environmental monitoring

The environmental monitoring programme is detailed in: P-NLFOOD-10032
The programme is risk-based and includes frequency of testing, organisms to be included, typical sampling areas and procedures for out of specification results.

The programme monitors for: spoilage bacteria, Listeria, coliforms, yeast and moulds.

Comment on the results of environmental monitoring programme:
Results seen were within specification aside from one slightly elevated count on coliforms that was satisfactory upon retest.

A clear review and trend analysis is in place. Key data and performance are provided as input to the management review (no issues).

The programme is found to be suitable and effective.

The level of environmental monitoring performed is commensurate with the final product risk.

The following evidence was reviewed:
- Trend analysis on environmental results in the MR.

4.12 Waste and waste disposal

Waste is categorized in several items as grey, paper, grease.
All waste containers were identified with contents.

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

Waste removal is contracted to for paper, plastic and grey waste.
Trademarked waste materials are not present.

Licensed waste removal was sampled for: categorised CAT 1 and CAT3 material to and Records of destruction are being retained.

The following evidence was reviewed:
- All waste and disposal bins are labelled with their type of waste. Sludging and correct disposal observed.

4.13 Management of surplus food and products for animal feed

Na

4.14 Pest management

Pest control is contracted tc
The scope is detailed as: rats, mice, cockroaches and flying insects.

No internal pest controller applicable.
No presence of infestation during the last certificated period or observed during the BRCGS audit.

Routine visits per year: 12x
Content of routine inspection: all traps and all 18 EFKs
In-depth inspections performed: 1x per year dd13-11-2023 with action list seen of last inspection.
Frequency is suitable.

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

The following evidence was reviewed:
- Folder of with maps dd 6-2-2024, adjusted for all building activities
- IPM certificate dd 10-02-2022
- Competence certificate of pest manager valid until 9-12-2024

4.15 Storage facilities

Storage spaces are maintained in hygienic conditions. Waste materials and chemicals are stored separately.

Temperature controlled storage is required, and this is monitored continuously through a central system with alarms when out of set limits.

No products contain allergens and so segregation is not required. Udders are removed in the slaughtering line and correctly segregated.

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

Stocks of materials are kept on site and stock rotation is via system identifying FIFO usage.

Delivery and storage record are in place for each packaging item and are kept at their storage location; seen during the audit within the traceability exercise with no issues noted.
Outside storage is not applicable.
No controlled atmosphere storage.

The following evidence was reviewed:
- Stocking of beef for storing and aging in several cells and stocking of packaging material in a separate hall.

4.16 Dispatch and transport

The transport of finished goods is all outsourced to external service providers. There are no company vehicles. This is organised and controlled by HQ. An overview is maintained in the site approved supplier list.
Verified GFSI certification of

Temperature checks and hygiene monitoring controls are in place for: loading finished product. This is daily using pre-use check sheets, managed as a CCP.

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

Vehicles back directly onto covered loading bays, which are closed with double doors when not in use.

The following evidence was reviewed:
- Dispatch of art 2194 on 12-01-2024 with correct temperature control.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.9.4.	No such packaging
4.10.2.	No filters and sieves
4.10.3.5.	No X-ray for foreign body detection
4.10.4.	No magnets for this product
4.10.5	No optical sorting equipment for this product
4.10.6.	No glass, cans or rigid containers
4.10.7.	No such equipment
4.11.7.	No CIP
4.12.4.	No such practices
4.13.	No products for animal feed
4.14.3.	Pest control is outsourced
4.15.4.	No controlled atmosphere
4.15.5.	No outsourced storage

5. Product control

5.1 Product design/development

The product design/development procedures are clearly detailed in: P-NLFOOD-10165 Shelf-life testing

There is no real product design or development. Product range may be a different cut, but even this is very limited and would consist out of a variation on current products – which is not limitless.
Product is mostly minor product adjustments rather than new developments.

Shelf-life validation:
Shelf-life trials follow documented protocols that reflect appropriate conditions.

Shelf-life testing is done yearly, where an article from every group is tested. This is planned in document P-NLFOOD-10165, standards (microbiology, organoleptic) are taken in P-FOOD-10008. When shelf-life tests are done, there is a microbiological as well as an organoleptic test that is done. Typical shelf lives are 10 days for offal products, 14 days for trimmings and 35 days for other cuts (vacuum packed products). Fresh products generally hold 6 days of shelf life. Last test on product used for the traceability test was performed and seen during the audit – all results clearly within the tolerances (which is also the case for the other products seen.

The following evidence was reviewed:
- Shelf-life test results for ar[illegible]

5.2 Product labelling

The following documentation describes the process: P-TIL-NL-10087 Traceability

There is almost no labelling done inside the company, as the only real raw material are live animals. After slaughter, these are provided with tags which include the identification number of the animal (e.g. [illegible]), the birth date, class, weight and other information necessary for the rest of the process. This includes a scan tag, which is used to scan the animals into the batches that are created. Final product labelling is according to legal aspects as required by the company; several checks done during production tour (article [illegible] and [illegible]). Finished product labelling includes specific regulatory information, such as the veterinary mark (NL 87 EG) and the information with regards to where animals were born, raised, slaughtered and cut. There is no artwork, so no approval (only B2B). There is 1 ingredient only and no allergens to be declared. Since all products are B2B, no specific cooking instructions are provided

The following evidence was reviewed:
- Labelling of boxes and crates with batch numbers before dispatch according to VO 1760/2000

5.3 Management of allergens

The following documents form the controls in this area: P-TIL-NL-10127 Procesbeheersplan

Allergens handled on site are milk in udder.

The risk assessment covers all potential sources, including cross contamination. Measures implemented include removal of udders in the slaughtering line.

Allergen containing re-work:
No rework

Claims for individuals:
No allergen claims are made.

The following evidence was reviewed:
- Udder removal in the line by competent person

5.4 Product authenticity, claims and chain of custody

Product authenticity is detailed in: P-TIL-NL-10224 Food Fraud

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

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

Examples raw materials, risk level and mitigating controls:
Significant vulnerabilities have been determined. Company is holding an IFS PIA declaration on integrity.

Review of the vulnerability plan is programmed to be completed annually.
Date of the last review: 07/07/2023

Claims:
A claim is made for Organic and for BL2*.
Claims are made for some products.

The following evidence was reviewed:
- IFS PIA declaration valid until 08-02-2026

5.5 Product packaging

The packaging materials for finished products are plastic, crates, dolavs.

Suitable packing procedures and materials are in place with relevant (food contact suitability/migration) specifications. The packing suppliers are GFSI certified.

Specification and declarations of conformity seen for the packaging used in the traceability test.

The following evidence was reviewed:
- bag with Doc
- supplier with GFSI certificate

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

The testing programme is outlined in: P-FOOD-10008 and P-FOOD-10009

A laboratory testing plan is developed for the next steps and is based on 2073/2005 EU legislation. All tests are done by an external lab which is ISO 17025 accredited). Schemes are as following:
- Carcasses: twice per week, 5 carcasses: total plate count, Enterobacter, STEC, Salmonella (sampled the analysis of the week of January 9th to 13th, 2023)
- Quarters that are bought externally, every delivery, 5 carcasses: total plate count, Enterobacter, Salmonella, Listeria
- Technical pieces, weekly on 5 pieces: total plate count, Enterobacter, Salmonella, Listeria
- Vacuum products, once per week: Enterobacter, Salmonella, Listeria
- Trimmings, once per week: total plate count, Enterobacter, staphylococcus, yeasts and moulds, Pseudomonas, Salmonella, Listeria and STEC
- Offal: once per month: total plate count and Enterobacter

A test plan on chemical parameters including heavy metals, pesticides, OTA, PCB, PFAS and dioxins dd 23-04-2023. DNA sequencing is per carcass.
Products that will be used to produce ready-to-eat products are positively released on Listeria, STEC and Salmonella. The customer needs to indicate that the products will be used for ready-to-eat items.

A plan of analysis is available and systematically followed, a dedicated QA team member is responsible. Product samples are taken from production at the line.

No onsite laboratories.
Out of specification laboratory results follow a defined escalation route.

The following evidence was reviewed:
- Trends on micro results and a comparison between all VION Beef plans in which VION Tilburg has best results.
- DNA sampling in the slaughtering line
- Half yearly calendar for the QA employee

5.7 Product release

Positive release only for products that will be used for ready-to-eat items. These are analysed for Listeria, Salmonella and STEC (all pooled) and, according to the results, these products can be used for ready-to-eat items or have an alternative routing (e.g. selling to a processer who cooks). This process is described in procedure P-TIL-NL-10132.

5.8 Pet food and animal feed

No pet food produced.

5.9 Animal primary conversion

The risk assessment with regards to prohibited substances is taken in the HACCP study and is considered as being sufficient. This is also sampled thought the government analysis programme. The site is in receipt of live animals, which are inspected by the government themselves and the stable responsible. The VKI passport of the animal will already be verified before entrance in the stable.

The traceability system covers the raw materials through work in progress to finished product including packaging materials and distribution according to procedure identification and traceability (P-TIL-NL-10067). This system is fully based on electronic data and written documents, day batch codes and bar codes:

- Cattle wear an earmark (+ accompanied by passport, track record and VKI according to Dutch I&R)
- Beef carcasses / quarters get a serial number (together with date of slaughter + origin + classification)
- Quarters (own production + additional purchase) get a batch code (date of production + origin)
- Finished product is traced depending on the date of production (SSCC-number per piece / crate / box is scanned at dispatch)
- Primary packaging materials are tracked based upon the date of starting a new batch
- Time and temperature requirements are fully established throughout the process and were found suitable.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.3.5.	No use of rework
5.3.6.	No such warnings needed
5.3.7.	No such claims
5.3.8.	No such processes necessary
5.8.	No pet food or primary animal conversion

6. Process control

6.1 Control of operations

The processes covered on the site include slaughtering and cutting to specification.
Control of operations based on process control sheets as reviewed during the production round and for the vertical audit process trail which cover controls/inspection of the process and product relevant to quality and food safety (start-up-checks, settings/program, characteristics, inspections product, CCPs, product weight, label checks, etc.). Process monitoring checks are including pre-SSOP, SSOP, temperature, product, metal

detector and equipment checks, label checks and hygiene rounds as well as checks at intake and at storage. Temperature is constantly monitored by the online monitoring system. Chilling and freezing controls management is constantly verified (for further details see under 2 The Food Safety Plan – HACCP). Verified all these process controls during the audit round in production and during the vertical traceability check.

Examples of lists and checks seen include:
- Pre-SSOP lists for cutting on F-TIL-NL-10072 and expedition on F-TIL-NL-10066
- SSOP list packaging on F-TIL-NL-10121 and cutting F-TIL-NL-10076
- Metal detectors: F-TIL-NL-10064 and notification of findings on F-TIL-NL-10081
- Weight verification: F-TIL-NL-10114
- BBE verification: F-TIL-NL-10120
- Product verification: F-TIL-NL-10133

6.2 Labelling and pack control

There is a process and line clearance check for labelling and removal of labelling from the line at a product change over which is only on batch change-over.
Records of checks were sampled from previous days and from the vertical audit trail.

At the time of the audit there was no change over on the lines so this could not be witnessed but the process was discussed with the labelling supervisor.
There is no online verification equipment for the correct label.

The following evidence was reviewed:
- Label control on item batch

6.3 Quantity, weight, volume and number control

All products are sold by weight. Metrology verifies the balances for commercial purpose. No issues identified. Calibration of the scales is demonstrable. Apart from the calibration there also is a daily verification of the weighing scales with calibrated weights, as seen for the weighing scales before labelling

Stomachs are sold by quantity.

No online check weighers.

6.4 Calibration and control of measuring and monitoring devices

There is a clear schedule of calibration for all equipment. The records of calibration were checked for:
- F-TIL-NL-10048

This is a list of measuring equipment that is to be calibrated, last verification 05/01/2024. This includes items checked by the quality department. will hold items calibrated by the technical department.
Main procedure is P-TIL-NL 10074.

Calibration records of metal detectors (annual check), thermometers (annual check), balances (annual check), pH measuring equipment (is done at a frequency of 2 weeks).
Clear records of calibration were seen within defined limits for all the equipment sampled.

The following evidence was reviewed:
- Calibration of 17 weighing scales by

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.2.4.	No such equipment

7. Personnel

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

Induction training is required for all new employees and includes the company hygiene rules, site policy, general product safety and quality aspects, etc. There is a 2 yearly refresher training for inductions in place.

Training needs for personnel engaged in activities related to product safety, quality and legality are further defined in a competence matrix.
Employee training is defined in a documented procedure. For operators there are records of sign off against key tasks.

At this visit, HACCP team and packing employees were sampled. Clear competency records and refresher training records were seen.

The following evidence was reviewed:
- system with all employees and there attended trainings.
- Induction training for new worke on 1-2-2024

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

Hygiene policy is clearly communicated as part of induction programme and displayed on the wall in key areas. All requirements of the Standard are addressed. No deviations from the policy were observed during the audit. Blue, metal detectable plasters are provided in the first aid box.

Visitors are required to complete a questionnaire prior to entrance.

Adequate facilities in place. Hand and boot washing takes place at entry of the production and warehouse areas. No issues observed regarding washing stations. Staff canteens and consumption areas are segregated from production areas. Hygienic conditions are maintained. No issues observed during the audit.

Changing rooms are located close to production facilities and found to be clean and tidy. Personal items stored in lockers. Double sided lockers for personal and company issued clothing. Staff changes into workwear on site. Toilets are accessible from the locker rooms, segregated from production. Designated smoking area available outside of the main buildings.

The following evidence was reviewed:
- New staff locker room gender specific at entrance of cold areas
- Locker rooms for authorities
- Locker room for cleaning agency workers
- Locker room for blue / slaughter personnel

7.3 Medical screening
Staff medical screening is limited under national privacy law. Reporting of illness and injuries which might cause a risk to product safety must be reported according to the company hygiene rules. Visitors need to sign the visitor's log and therewith declare adherence to the company rules. The following evidence was reviewed: - Medical screening of employees is done at the start and further every 5 years, as allowed by law and for export licence.
7.4 Protective clothing: employees or visitors to production areas
Work wear of personnel includes suitable, protective clothing (including hair/beard nets) that provides adequate coverage. Clothing has no external pockets above waste or sewn-on buttons. Gloves, aprons, sleeves and other garment is used in production processes. White coats and trouser, hair/beard nets available for visitors. Laundering of clothing is done by external service provide (professional laundry service). Limited in-house washing of clothing is done. Segregation of clean and dirty clothing is effectively managed; there are dedicated closed bins for dirty clothing. Clean clothing is provided in a dedicated areas by personnel. The following evidence was reviewed: - Staff facilities with bins for dirty clothing and handout point for clean clothing - All aprons, gloves are for single use. Minor: Personal hygiene instruction is not strict enough as seen lockers used wrong (on storage of which items where) without correction and seen PBM/Malienkolders worn over hygienic company clothing.

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.