Audit Report Global Standard Food Safety Issue 9

1. Audit Summary			
Company name	Vion Enschede B.V.	Site code	1598805
Site name	Vion Enschede B.V.		
Scope of audit	Deboning and cutting to specification of beef. Curing, slicing, mincing, marinating, and tumbling of beef, bulk packed in dolavs or bags in crates, (consumer-) MAP or vacuum packed, including outsourced freezing and thawing of beef.		
Exclusions from scope	None		
Justification for exclusion	Non-applicable		
Audit start date	2024-03-19	Audit finish date	2024-03-21
Re-audit due date	2025-03-25	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	Announced
Previous audit grade	A+		Previous audit date	2023-01-18	
Certificate issue date	2024-05-06		Certificate expiry date	2025-05-06	
Number of non-conformities			Fundamental	0	

2. Audit Results

	Critical	0
	Major	0
	Minor	8

3. Company Details

Site address	Het Lentfert 74 7547 SP Enschede		
Country	Netherlands +031534864444	Site telephone number	+031534864444
Commercial representative name		Email	
Technical representative name		Email	

4. Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift pattern	Dayshift, 2 shifts or shifted day shifts, 5 days per week				
Seasonal site	No				
Seasonal opening times (Start/end date)	Click or tap to enter a date.	Click or tap to enter a date.			
Other certificates held	Skal, IFS PIA, ISO9001 (multi site), QS				

4. Company Profile

Outsourced processes	Yes
Outsourced process description	Transport, storage and plate-freezing is done by subcontracted suppliers who are certified to GFSI standard. E.g. and (certificate BRC Food); Some (packed) beef products do come back to the site of Enschede, plate frozen products do not come back to the site of Enschede.
Regions exported to	Europe Choose a region Choose a region Choose a region Choose a region Choose a region
Company registration number	NL 305 EG
Major changes since last BRCGS audit	No major changes in processes, beside a new QA manager has started a few month ago.

Company Description

VION Enschede B.V. is a site of VION Food Group in which beef is cut and produced to specification for retail and industry. This beef plant is together with the one other Dutch beef plant, led by the German VION Beef group. The third Dutch meat plant in Leeuwarden is closed, so BIO beef is imported/ bought by external slaughterhouses .

Vion HQ is based in Boxtel and provides support on several main processes such as sales, QA, Internal audits and contract management.

VION Enschede is bought summer 2010 as a former cattle slaughterhouse, this is still there and maintained but close for operation. The production consists of two halls for production and several cells for storage. There is an area for receiving and dispatching hanging goods and an area for receiving and dispatching goods in bulk.

About employees of which permanent, including the ones in the offices. Production employees work in one or two shifts (mainly via agencies/subcontractors) mainly in production.

There is a small team leaded by the operation Director Beef with maintenance workers, a sales team, finance manager, QA manager and 2 QA/QC employees and HR manager supported by coaches.

4. Company Profile

Main activity is the deboning and packing of fresh beef for retail organizations and meat industry Volume of production for Bio, Groenlo en about Ton of which T BIO (carcasses) and T consumer Products and minced meat (mainly produced for retailers in Sweden/ Denmark). Retailers are the main customers (Western Europe with a focus on North Europe: Sweden and Denmark), but also meat industry in Western Europe mainly The Netherlands. There are 3 type of products (so 3 HACCP studies): Cutting to 1st slices meat products (technical parts, fresh bulk packed in crates or dolavs or most vacuum packed in foil), sliced products (which can be marinated/ tumbled), fresh packed in crates, vacuum packed, skin packed or map packed and minced meat production to be packed vacuum or MAP. There are cutting lines and packaging lines and a fresh meat line. On site (m2) is app m2 in use by factory and some m2 for offices, utilities, and maintenance. Of m2 not all is in use as the former slaughtering house is partly closed. The production is organized from 6.00 till 16.00 basic in one shift and when needed this can be expand to a 2-shift operation. In special situations shifted shifts are implemented as some employees start a bit later and work until about 7PM (as example expedition, employee to manage dispatch). All finished products do The audit was performed announced, also for next year an announced audit will be planned.

5. Product Characteristics

Product categories	03 - Raw prepared products (meat and vegetarian) Category Category Category Category Category Category Category				
Finished product safety rationale	Chilling (temperature <7°C, <2°C), marinated, tumbling (in brine), fresh, map and vacuum packing				
High care	No	High risk	No	Ambient high care	No
Justification for area	Appendix 2 applied. All products must undergo full cooking step prior to consumption				

5. Product Characteristics

Allergens handled on site	None 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	Oganic, Simmentaler
Product recalls in last 12 months	No
Products in production at the time of the audit	Beef halves, quarters, labelled beef, sliced beef, cured beef (vacuum and fresh), minced meat (vacuum and MAP packed), sliced marinated beef (CU packed) skin packed, labelling of pre-packed beef.

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	NA		
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
	Managing Director	x		x	
	QA manager	x	x		x
	QA officer	x		x	x
	QA employee			x	
	HR Manager			x	
	HR officer			x	
	Maintenance manager	x		x	x
	Engineer			x	
	Engineer			x	
	Manager operations	x	x	x	x
	Sales/ specifications			x	
	Prod. leader cutting department	x	x	x	x
	Manager Retail	x	x	x	

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
18-01-2023	BRC Food v8	Unannounced	Pass

Document control			
CB Report number	5889360		
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
1.1.2	The organization has several items pointed out for further development of the food safety and quality culture such as training, feedback from employees, open communication, performance of evaluation rounds to measure activities related to safety/ legality/quality However these subjects for improvements and developments were not defined in one clear plan incl. these goals to be reviewed and updated at least annually.	A brief overview of various aspects has been added to the Q1 2024 management review. (See attachment 1) Food safety culture.	Information regarding the food safety culture is overseen by QA Central, and a plan for its development is currently in progress. Annual KPIs and objectives are being established for this purpose. The food safety culture will become a permanent component of the management review and will be discussed as such in the management team. (See attachment 2) 31-05-2024 *Closed to be checked during next audit*	Due to the implementation date of BRC version 9 in February 2023, and shortly thereafter the departure of the quality manager, this item was not included in the management review of 2022/2023. No clear plan has been developed for the management review of 2023/2024. Many aspects are present, but not yet formulated into a plan.	2024-04-12	

Minor						
1.1.4	The MR is updated 4x year (quarterly). The end of the year MR (July 2023) was found not fully complete as of some subjects no information was included in the MR of Q@ 2023 (end of FY 2022/2023). Information was missing such as status of training, status of deviations, status of a food safety culture goal as planning and an employee survey. (this information was available, only not included in the MR)	During the second management team meeting in the new lineup on December 13, the year-end report was briefly discussed. At that time, the report was approved, and no further additions were made, as this information had already been centrally processed. Starting from Q1 2024, the food safety culture will be addressed in the management review and discussed in the management team. The procedure for a food safety culture plan is being developed by Vion Central. (See attachment 3) Quarterly Review	The procedure for a food safety culture plan is being developed by Vion Central. (See Attachment 4) 15-05-2024 *Closed to be checked during next audit*	Due to the departure of the previous QA manager, certain sections of the management review were left incomplete. As a result, not all data was available, rendering the management review incomplete. The document was filled out to the best of the QA officer's ability and sent to Vion Central. Additionally, because there was no QA manager, TD manager, or HR manager during this period, the MT meetings did not take place. Consequently, the management review was not sufficiently discussed in the MT, and the report was accepted for informational purposes without noting its incompleteness.	2024-04-12	
3.3.2	The records with shelf life per products, were	For now, a packed-on date is manually entered for the	In consultation with the software developer, an	Due to the linkage between the deboning	2024-04-12	

Minor						
	not very clear. The shelf life (x days for vacuum/ skin or MAP packed) is defined per article number. In this document it is not fully clear how this shelf life is established because it was noticed this differs per type of product. Fresh meat: shelf life is deboning date plus x-days during portioning/ labelling, processed meat is final packing date of processed meat plus x days. The procedure / documents were not fully clear when which rule was valid and how this was controlled.	natural products. Employees are required to transfer the packaging date onto the label control form. Processed products already have the correct packaging date applied. (See attachment 5)	option is being developed where users will be required to input a "packed on" date for certain items. 01-06-2024 *Closed to be checked during next audit*	date and the batch code, where the batch code is entered into the system, the packaging date is automatically populated with this date. This aspect was overlooked.		
3.6.4	Specification review was not clearly performed for all specifications 1 x 3 years (was also not included in the procedure.	Review of specifications has been carried out as planned. Additionally, the validity of specifications has been included in the procedure. (See attachments 6 and 7)	Reviewing auxiliary material specifications will be included as a standard agenda item in the HACCP meetings. (See Attachment 8)	The final product specifications are sent to the customer upon request. Once such a request is received, the specification is routinely	2024-04-12	

Minor						
			01-06-2024 *Fully closed*	reviewed first. The majority of final product specifications have been agreed upon with the customer. However, there hasn't been much attention given to refreshing the specifications of the auxiliary materials.		
4.2.4	The doors at the loading area were not closed, this way drivers can enter the site further than allowed. The doors were deliberately un-locked so that they remain open	The doors have been closed, and employees have been reminded of the importance of keeping them closed. Furthermore, the expedition staff have undergone additional training on Food Defense. (See attachment 9) Training is performed	Technical adjustments are being made so that employees cannot block the doors anymore. Another door will be equipped with a blank plate on the handle, allowing it to be opened only by someone with a key. (See Attachment 10) 15-05-2024 *Closed to be checked during next audit*	The doors are closed, blockades have been lifted.	2024-04-12	
4.7.4	There is an oral transmission of equipment/situations after maintenance on equipment during or	Effective immediately, a paper document will be reinstated for recording the release after maintenance	In , a feature is being developed to enable digital release. The supervisor will	The procedure for this was not followed correctly.	2024-04-12	

Minor						
	after processing towards production. No proof could be shown, no documented hygiene procedure could be shown that maintenance work will be followed by a clearance procedure.	during production. (See attachment 11)	directly sign off on the order in the app. 01-08-2024 *Closed to be checked during next audit*			

4.9.6.3	On top of the packing line a carton box was placed with plastic trays which can pose foreign-body contamination risk of the meat at that line.	The box has been removed, and the packaging has been transferred to plastic crates. (See Attachment 12)	All packaging is being brought into the department without cardboard. The use of MAP trays will cease in the near future. The production of MAP packaging is being transferred to another production location. As a result, cardboard boxes with packaging will no longer be used. (See Attachment 12) 01-05-2024 *Closed to be checked during next audit*	In production, cardboard should not be near the filling lines where open product is handled. Therefore, packaging materials are supplied in plastic boxes or repackaged outside of production. In this case, there was a stock repackaged outside of production in plastic crates. At the end of the production, an employee realized that there was insufficient packaging material available. The standard procedure is to involve the employee responsible for preparing the materials, but this employee was already off duty at that time. Consequently, the production worker fetched a box themselves and temporarily placed it on a part of the machine that was not in use.	2024-04-12	

Minor						
7.4.3	In cold areas since a few weeks, balaclava's were provided and worn. These balaclava's were black and not fully covered. The balaclava's were found not included in the laundry operation procedure.	A washing instruction for the caps has been immediately displayed on the screens. Additionally, upon issuance, a washing instruction in multiple languages is provided. (See Attachment 14)	During the upcoming HACCP team meeting, the availability of balaclavas will be verified. Actions resulting from this verification must then be determined and followed up on. 01-05-2024 *Closed to be checked during next audit*	Due to observations made during multiple audits regarding the improper wearing of hairnets and the use of personal hats underneath, we sought a solution to address this issue. Several options were considered, and issuing balaclavas was deemed the best choice. However, further considerations such as laundering instructions or outsourcing washing were not taken into account. Black was chosen as the color due to its commonality, although white would have the advantage of making contamination more visible.	2024-04-12	

Minor						

Comments on non-conformities
-

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	19-03-2024	08.30	17.00	Physical	
			LA	20-03-2024	08.30	17.00	Physical	
			LA	21-03-2024	08.30	12.30	Physical	

1. Senior management commitment

Policy
The site policy is documented in: **P-ENS-NL-10029 14-02-2023 signed 15-12-2023**
It is signed by the person with overall responsibility for the site.
Commitment to continuously improve the site's food safety and quality culture items are included.
Communication to staff: Displayed in key area (hallway to canteen and restrooms, on notice boards.

The organization has several items pointed out for further development of the food safety and quality culture such as training, feedback from employees, open communication, performance of evaluation rounds to measure activities related to safety/ legality/quality. However these subjects for improvements and developments were not defined in one clear plan incl. these goals to be reviewed and updated at least annually. (separate goals were reviewed such as training and performance of hygiene/evaluation/behaviour rounds. So quality culture at the site is identified but by separate parts which are communicated through various channels (policy, induction program, annual newsletter, TV screens in the canteen)

HQ has set up a procedure for FSC P-NL-Food 10059. However for this site there is no "one" complete culture improvement plan documented, a ***Minor NC was raised against 1.1.2*** only parts were implemented, monitored and improved (in quarterly MR). However activities are undertaken, involving all sections of the site: personnel survey (last year 2023), year-end meetings with personnel, food safety training, whistleblowing policy clear communicated incl. on the TV screen in the canteen, sign up to business code of conduct (whistle-blower procedure).
The organization has monitored and documented the effectiveness of their operation with different mechanisms : Clear organization structure and meeting structure. Each department has its own manager which have daily meeting in Tier 1. Meetings: Tier 1, Tier 2, Tier 3 also with HQ management Quarterly reviews are held. The management review consists of the results from Q3, Q4, Q1 and Q2.

Frequency of reviews: 4 x year (every quarter)
Senior management were able to discuss the plan during this audit (spoken to Operational Manager).

Food safety and legality objectives
A corporate policy is established and approved, with the slogan "Daily Delicious". The strategy is supported and modelled with the OGSM-method which will now be rolled out to this site of Vion.
Notable food safety and quality objectives include:

- Reduce complaints cost of complaints
- Reduce cost of complaints
- Reduce complaints cost of complaints
- Min. 25% permanent employees
- Reduce water usage / gas usage / electricity usage
- Score arbo audit target 3.9

Objectives are monitored 4x year by QA manager incl. all MT members

Key results or significant trends: the site is not meeting all established objectives / effectively progressing through its objectives, but these are identified and by the VION improvement system allocated (VOS) to analyse and take measures if needed and when possible.

Management review

Frequency of management review meetings: 1x 2 weeks Tier 2. All required items are discussed.
Who typically attends the meeting: MT members (QA, control, management production management, maintenance
Date of last management review meeting: **13 March 2024**.
How minutes and actions are communicated to staff and recorded: Senior management is present during most of the meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. For Tier also information is provided on boards so visible for all employees.

However a ***minor NC was raised against 1.1.4*** as the information in the quarterly MR was not fully completed. Information was missing such as status of training, status of deviations, status of a food safety culture goal as planning and an employee survey. (this information was available, only not included in the MR of Q2 2023 (end of FY 20222/2023)

Regular meetings
Routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. The structure is documented. Points of attention /input through the attendance of MT with different backgrounds and focus.
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 2x week.
Minute meetings reviewed: 10/01/2024

Previous nonconformities
All previous non-conformities have been closed out suitably.
Thorough root causes are identified through application of discussions. Preventive actions are effectively implemented to prevent re-occurrence. A CAPA excel list is maintained (Excell File) by QA e.g. register of actions e.g. audits external and internal, status ongoing.

Organisational structure, responsibilities, and management authority
The site organization structure is documented in: **P-ENS-NL 10020 26-02-2024**
Management structure:
The senior management has appointed qualified employees for key functions (managed by HR). 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. Procedure **P -ENSNL-10006 2024-01-19** describes HACCP team of location Enschede has a multidisciplinary team

Current structure and reporting are up to date.
Permanent expertise is provided by HQ Vion Boxtel but also expertise is shared with other Vion locations, managed by Vion HQ; the QA managers of all locations are part of the Internal audit team and audit “eachothers” locations to support the internal audit programme.
Overall responsibility for the day-to-day management of the food safety system is with the Operations Manager together with the Production Leader deboning and manager Retail, supported by the local QA manager.

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, document is available in 6 languages (P-food-10049), anonymous concerns can be shared by a special phone number / email or QR code which can be scanned. The Operations Manager is responsible for monitoring and cascading this to the relevant stakeholders across the site. No issues reported since last audit. Last visit NVWA was 2024-01-19, no remarks. Next hygiene system audit by the NVWA is planned 2024-04-19.

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

2. The Food Safety Plan – HACCP

There is one HACCP manual described as the: **P-Ens-NL-10006 19-01-2024**

HACCP Team
The food safety team is detailed in: P-Ens-NL-10006 19-01-2024
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 incl. microbiology. The other members all had appropriate training and experience. Training records were sampled. 4x Year meeting, 14 Dec 2023 was last meeting.

Scope of HACCP
The HACCP system scope is documented in: **P-ENS-NL-10011 2022-06-24**. It covers relevant processes and all products on site.
No vulnerable groups have been identified. Product is suitable for regular consumer groups.
Product descriptions are detailed in: **basis document of the Hazard analysis P- Vion-10000 and 10001**.
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:
P-ENS-NL-10005 2022-06-21 which are under construction at the time of the audit. Finish date of this projects was set on 2024-03-30.
Record date and reason of last verification: 2024-02, verified by the new QA manager, this way under construction
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**.** A VION central PRP and CCP plan is the basis for the local HACCP plan (P-FOOD-10000 PRP's and additional CCPs' and CP's is regularly updated). The hazards are part of this document (incl. microbiological (esp. pathogens, with Salmonella as higher risk (therefore temperature at receiving is a CCP), chemical, physical (incl. radioactivity/ radiological hazards) Severity vs likelihood is considered, all in basic managed and supported by QA of HQ Vion Boxtel.
No allergens on site.
The local HACCP plan (process beheersplan) is last updated 2022-06-24. No alterations in CP's or CCP's.
Reassessment / verification taken up in the quarterly management review. This verification (reassessment) of the HACCP system is done.

Each identified hazard was reviewed and given a risk rating 1 to 9 (severity and likeliness of a hazard occurring = 3 x 3 matrix). A decision tree is used. A set of flow diagrams is part of the HACCP documentation, the steps are: Process steps in sequence: Receipt (CCP temperature), storage, cutting, metal detection, injecting (option) / slicing, packing, storage and dispatch (CCP temperature on outgoing and returns). The processes are shown on flow diagrams for each process. Checked during the audit for deboning and retail (packing). Also, a minced meat line is part of the production, The production of minced meat with 2 mincing machines, two portioning machines and a Map /vacuum (skin) pack machine and vacuum packers.

CPs, limits and controls
At this moment the following CCP apply with the critical limits (all related to temperature of incoming or outgoing product):

CCP 1 reception of parts of carcasses and CCP 2 reception of meat

- Fresh carcasses/ parts of carcasses/hanged meat and meat in bulk (dolavs/ crates)
- T ≤ 7 °C core temp.(CCP 1a en CCP 2a)
- T ≤ 6 °C vacuüm/MAP → surface temp. (CCP 2b)

- Organs:
- • ≤ 3 °C Core temp. (CCP 2c)
- • ≤ 2 °C vacuüm/MAP → srface temp. (CCP 2d)

- Meat preparations:
- • ≤ 4 °C core temp. (CCP 2e)
- • ≤ 3 °C vacuüm/MAP → srface temp. (CCP 2f)

- Minced meat:
- • ≤ 2 °C core temp. (CCP 2g)
- • ≤ 1 °C vacuüm/MAP → srface temp. (CCP 2h)
-

Monitoring frequency: min 5 products temp measurement spread over the batch: all described procedure monitoring and verification of CCP 1 and 2 reception of products. **P-ENS-10010 2023-03-01.**

CCP 3 dispatch temperature of products

- Fresh carcasses/ parts of carcasses/hanged meat and meat in bulk (dolavs/ crates)
- T ≤ 7 °C core temp.(CCP 3a)
- T ≤ 6 °C vacuüm/MAP → surface temp. (CCP 3b)

- Organs:
- • ≤ 3 °C Core temp. (CCP 3c)

- • ≤ 2 °C vacuüm/MAP → srface temp. (CCP 3d)

- Meat preparations:
- • ≤ 4 °C core temp. (CCP 3e)
- • ≤ 3 °C vacuüm/MAP → srface temp. (CCP 3f)

- Minced meat:
- • ≤ 2 °C core temp. (CCP 3g)
- • ≤ 1 °C vacuüm/MAP → srface temp. (CCP 3h)

Monitoring frequency: min 5 products temp measurement spread over the batch: all described procedure monitoring and verification of CCP 1 and 2 reception of products. **P-ENS-10012 2023-03-01.**

Critical temperature limits are: Organ meats: ≤3 °C, vacuumed organs: ≤2°C; Meat: ≤7°C), vacuumed meat: ≤6°C. CCP monitoring has been defined and documented; records of CCP's were checked during this audit. E.g. The CCP's temperature checks are done on 5 places for delivery of fresh hanging meat.

In general good control was seen on CCP's. Steady group of employees performing the measurements, corrective actions taken correctly.

Beside CCPs, there are about 20 specific control measures (CP's) on various prerequisite and operational processes: personal hygiene, metal detection, household plan, identification and traceability, pest management, training, etc.

Validation of the CCP is done at central level, report is part of the central management system (quality online)

Documentation and record keeping is verified. Results of verification are recorded and communicated to the HACCP food safety team.

More than 20 PRP's / CP's have been identified in: **P-ENS-NI10011 2022-06-24**. Control measures have been defined. This includes e.g.:

1. Packaging / label control (allergens, EAN code verification).
2. Cleaning and disinfection (Pre SSOP check start up after cleaning)
3. Recipe control / check on cutting size
4. Packing & Label check
5. pH check received carcasses
6. % fat by X-ray
7. Weight control
8. Metal detection
9. Traceability
10. Allergens
11. Pestcontrol
12. Personal hygiene
13. Hygienic working/processing/ GMP incl SSOP check daily per department
14. Chain control chilling / Area temperature monitoring
15. Water quality
16. Raw materials appearance/handling
17. Hygienic handling after contamination of products (e.g. cleaning/handling fallen meat)

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.

Validation, verification and review:
The company has effectively validated and verified the HACCP/Food Safety Plan, including the critical limits, control measures and Cp specific for controlling food safety hazards. Procedures of verification have been established. SSOP Daily checks and specific daily/batch checks

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, performed on daily basis.

Frequency of planned HACCP system review (at least annually): 1 x year (as input for MR Q2 June/July)

Date of last review: **zie MR Q2 2023**
Completed by: and additional performed by new QA manager 2023-12-14 (new QA manager started in November 2023).
Reason for completion: no longer injection of meat is performed, only tumbling with additives to prepare meat preparations. So the process for injection was deleted. This way flow charts and RA is under construction to delete this process.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
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3. Food safety and quality management system

3.1 Food safety and quality manual, 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 and 5 more other languages to support the employees understanding the information provided. When staff is not having an appropriate level of English or Dutch Language skills, 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, clearly marked. Changes are also kept by the QMS system.

All documents seen during the audit were complying.

Record completion and maintenance
Records are in good condition and retrievable electronically or on site. Records retained 3 years (max shelf life fresh (vacuum) is 35 days).

However the records with shelf life per products, were not very clear. The shelf life (x days for vacuum/ skin or MAP packed) is defined per article number. In this document it is not fully clear how this shelf life is established because it was noticed this differs per type of product. Fresh meat: shelf life is deboning date plus x-days during portioning/ labelling, processed meat is final packing date of processed meat plus x days. The procedure / documents were not fully clear when which rule was valid and how this was controlled. ***Minor NC on 3.3.2***

The following supporting evidence was reviewed:
Documents in the QMS (digital) and on site during the onsite, digital and on paper.

3.4 Internal audits

The following document(s) define the process: P-VION-100112023-11-27, all included in Q planning 2023-2024 (2023-02-26).
The audits generally follow BRCGS guidelines and clause structures.
Internal audits are conducted: 4 x year. 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: internal auditors provided from Vion HQ and QA managers of other Vion sites (intercompany) 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: a Word format..
Objective evidence of compliance and non-compliance are reported. The audit criteria are clearly referenced. Findings are included in the word document and extra monitored in an excel file, 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: min. 4 audits per year:

2023-06-07 announced process audit, 2023-09-28 Hyg. audit, 2023-11-02 unannounced process audit, 2023-12-13 trace and recall, 2024-02-23 BRC v9 implementation incl. documentation.

The reports reviewed detail conformity as well as non-conformity. A few minor nonconformities have been raised with no trends identified. Root cause by discussion within HACCP team is included where required. All actions were closed within the due date. Audits contained a basic amount of detail. A project is running to digitalize internal audits which makes it more easier to report/ follow up and control corrective actions. Beside this the level of depth will be more visible.

A separate program of internal inspections of factory environment and processing equipment is undertaken verification rounds 1 x month.

This is reported in: for each specific inspection per department, a specific format.
Inspections are performed by using a checklist with the audit topic included and a clear action list . Performance is measured based on minors and major deviations. Actions in response to deviations are recorded, cascaded to team leaders for follow-up, and discussed in HACCP QA/QC meetings. Completion of actions is verified upon the next inspection by QA/QC. Effectiveness of the system is discussed in the Management Review and also separate with the managers as the lines are short in this company.

Inspection report reviewed during this audit: verification rounds Glass/brittle plastic 4 x y 2023-12-07, 2023-09-30, 2023-07-06, 2023-03-21, incl. hygiene Inspections sampled 2024-03-04
A few minor issues had been observed. Follow-up of actions is demonstrable with records.

Beside internal audits, more than 10 client audits are performed on site per year. Results (actions) are reviewed, handled and followed up, also included in the MR report.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Risk identification / risk assessment related to raw materials setup centrally by HQ in Boxtel resulting in product specifications specifying relevant aspects to quality and food safety (CP). As the meat suppliers are all within the Vion company, all approved suppliers. In case of incidental other suppliers, these are low risk (fresh meat). Additives and seasoning is supplied by well-known and fully certified approved suppliers. No high-risk food suppliers identified for this organization. For packing material, Approval of suppliers based on GFSI-certification. All suppliers of packaging materials have to be approved by the central Vion office entered into the system ( ) before they are allowed to deliver. Supplier questionnaires used too. Some additives from the brine delivered by trading companies.

The company's raw material risk assessment, including primary packaging is documented in: List suppliers' additives Vion Food NL (S-MMI-10190), List of approved transporters (S-MMI-10013) and 'List of approved cold stores in use by VION (S-MMI-10199), yearly demonstrably reviewed by Vion HQ

All potential risks have been appropriately considered.
No significant risks include for this site applicable.
The risk assessment forms the basis for the raw materials acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.

Reviewed during the audit according to the last updated evaluation 06.12.2023.

- (foil, BRC Packaging-certified)
- (foil, BRC Packaging-certified)
- (meat rump) GFSI certified

- herbs and spices, GFSI certified

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). The meat is bought by the companies site manger (and purchase manager) by him selves from approved (GFSI certified) suppliers (slaughterhouses) all over in Europe.
Acceptance by receiving checks : close look, also by experienced employees, well known with carcasses and beef, CCP (temp check), monitored during site audit day 2 reception of meat CMR # (BIO carcasses parts) .

Deliveries are visually checked for product integrity, labelling and cleanliness. Based on risk assessment, food safety hazards are controlled through COAs, internal analysis etc.

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 during day 2, reception by expedition.

3.5.3 Management of suppliers of services

The following services are used and assessed:

- Pest control
- Laundry services
- Contracted cleaning
- Transport
- Off-site storage
- Temporary employees

Supplier approval, monitoring and evaluation process documented (referenced under 3.5.1) in List of approved transporters (S-MMI-10013) and 'List of approved cold stores in use by VION (S-MMI-10199). Seen the last updated evaluation 06.12.2023.

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 review Q2 include performance of suppliers of services and feedback.

The following evidence was reviewed:
MR Q2 2023
Supplier approval file (excel)

3.5.4 Management of Outsourced processing

Outsourced process steps to a third-party or undertaken at another site is: Freezing and thawing incl. storage.

Transport, storage and plate-freezing is done by subcontracted suppliers who are certified to GFSI standard. E.g. and (certificate BRC Food); Some (packed) beef products do come back to the site of Enschede, so these are outsourced, raw material in crates to be used e.g. for minced meat, plate frozen products do not come back to the site of Enschede.

Beside this, raw material (beef) is thawed external by , this is also an outsourced process as the products return to the site.

Contracts are in place between the site and processor. Service specifications are present for the outsourced activities. (managed by HQ)

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 electronically (MDM) and access is restricted to the compliance 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: • 9863 Rump • Raw material: (trace test) • Finished product: art 3015 Hackfleish d THT 7-08-2023 • Packaging: • Cleaning agent • and allergen free • Packinng gas: CO_2 Foodgrade: spec. May 2023, O_2 Foodgrade : spec. May 2023 Recently (since a few weeks) new system in use, all retail products are now included and reviewed. However, specification review was not clearly performed for all auxiliary materials specifications 1 x 3 years or if changes occur (was also not included in the procedure) ***Minor NC on 3.6.4 .*** Formal agreement of customer branded products is verified through the system of the retailers (for instance SIM, Trace one, or GS1). Verified customer approval during the vertical traceability exercise. **The following evidence was reviewed:** Procedure P – Ens NL-10027 8 Jan 20219 Management of specifications
3.7 Corrective and preventive actions

A documented system is used to manage corrective and preventive actions on the shopfloor
Corrective actions taken are documented in CAPA Excel overview list for internal/external audits and hygiene inspections. For complaints on the complaints form. In this action list the responsible for completing/ closing the non-conformity is monitored for reporting the status of progress. In all mechanism's attention for root cause analyses. Seen action list which was ongoing reviewed and adjusted. Corrective actions and preventive action system is up to date.
The huddle white boards are implemented, and these daily morning meetings are implemented). Corrective and preventive actions are discussed during the Tier1-2 -3 meetings.

During this audit, several samples were taken to verify effectiveness of corrective and preventive actions. Thorough root cause analysis is performed depending on level of deviation and action required.

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

The following evidence was reviewed:
Plus ultimo
IA action list
Complaint records

3.8 Control of non-conforming product

Control of non-conforming product is detailed in: **P-ENS-NL-10024 2023-01-06 complaints handling** And in P-ENS-NL-10004 2023-01-08. All fallen meat incidents have to be reported on the SSOP-checklists. Non-conforming products are categorised to CAT 1 (CAT 3 is degraded to cat 1). Blocked products are accompanied by form P-ENS-NL-1007 2023-02-06 .
After recording a complaint or incident, a RCA is performed corrective and preventive actions are defined and handled. Categories are used, food safety related issues complaint codes start with 20, this way easy to select in the file. No serious FS related issues were detected.

Raw materials 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 labelled and put on hold. There is a segregated section in the warehouse for non-conforming products and returned goods.

Responsibilities regarding release of products on hold lies with product management together with QA and follows a clear decision-making process.

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

The following evidence was reviewed:
FB complaint 2023-10-27 plastic in minced meat art 3303, no piece sent, not to analyses
2023-11-13 plastic # seen memo incl. RCA, plastic came from a dolav.
In MR analyses of complaints were seen, discussed during the 3 monthly meeting and per incident with involved team. Complaints are below max. KPI.

3.9 Traceability

The traceability process is documented in: **P-Food-10015**

Traceability through the process:
Traceability system operates through ERP computer system and paperwork enables trace of raw materials and packaging from supplier through processes to packing and dispatch. Incoming goods are entered into the ERP system and labelled. Basically, full pallets are transported from the warehouses to the production facilities and do not return. Replacements recorded based on scanning. In case of distributing recipients from the pallets to the production facility this will be entered manually into the system. Recording of batch information raw materials, packaging materials, rework batches or pallets to be re-used on the production record sheets (as reviewed for vertical audit).

Traceability marking on products:
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: min 1x year
Last test conducted**:** 13/12/2023
Product **:**
Results are retained as documented information and reports include all relevant information and data (including mass balance information). Traceability is achieved within 3 hours.

Vertical audit details:
Finished product:
Raw materials: Rumpen in 3 delen
Printed packaging and labels: Label and GT labels, info printed based on ERP system.
Production/packing date: labelling tumbling , delivered
Quantities reconciled: kg finished product

Key documentation reviewed including process control and quality control documentation:
With a vertical audit list, (the internal LRQA list based on Raw materials/Production/Distribution/Quality Assessments/Finished Product Weight Control/HACCP - Critical Control Points/Other Food Safety Controls/Microbiological Controls/Product Specification/ Cleaning Management Systems/ Maintenance/Calibration/Training records) during the audit was tested.

Summary traceability and vertical audit:
Tracing (forwards/backwards) including packaging was possible within 3 H 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 .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: **Klachten en claims procedure P-NL-Food 10054**

Follow-up of complaints is managed through: Excel list manged by Sales and QA, complaints are handled and investigations are completed by the site and returned to the central function for responses. Corrective actions are carried out promptly and effectively. All complaints were deemed as not justified following investigations.

After recording a complaint or incident, a RCA is performed corrective and preventive actions are defined and handled. Categories are used, food safety related issues complaint codes start with 20, this way easy to select in the file. No serious FS related issues were detected.

Product complaints:
2022: complaints per week (all kind of complaints)
2023: complaints per week (all kind of complaints)
FS related complaints < 0,2 /1000 kg FP

Top 3 complaint reasons:
1. Foreighn body complaints differ between piece of bone and pice of plastic
2. Temperature related
3. Quality

A trend analysis is maintained and documented and discussed in management meetings (including the management review (KPI)).

There has been no significant increase in a complaint.

The following complaint samples were taken:
Monitoring in the X-matrix. Complaints mainly about foreign bodies and partly temperature transport. No (other) food safety complaints. Corrective actions and root cause were made when needed.

FB complaint 2023-10-27 plastic in minced meat art 3303, no piece sent, not to analyses
2023-11-13 plastic #Huls seen memo incl. RCA, plastic came from a dolav.
In MR analyses of complaints were seen, discussed during the 3 monthly meeting and per incident with involved team. Complaints are below max. KPI.

3.11 Management of incidents, product withdrawal and product recall

Incident management process documented in P10015, v07.11.2023 and P10009, v12.09.2023. The recall procedure identifies those who are to be notified (including CB, LRQA) 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 will be informed within 3 working days according to procedure. Further via central HQ, quarterly reporting to LRQA seen.

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

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 / The following incident occurred since the previous visit.

Date of last incident management procedures test: 13/12/2023
Type of test completed: recall/withdrawal/incident. Traceability test details company:
Frequency: min 1x year

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. Report of conducted test was seen, ok.

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

4. Site standards
4.1 External standards
Plant located in an industrial area in a rural environment. Site boundaries are clearly identified. Premises is partly fenced off with security gate access to the facility and supervision of all visits incl transport by a porter on site between 4 AM and 11 PM, outside thee hours the main port is locked, then the site fully fenced. Types of buildings include: production facility, storage building, offices, and maintenance workshop. **Site security:** Unauthorised access is prevented by use of ID badges access. Visitors/contractors must register at the security building and request for a badge. Several cameras are installed. Good condition of constructions noted. No risks have been identified related to the external environment. Site area is properly maintained.
4.2 Site security and food defence
Site boundaries well defined and security (external facility provider) in place with check for visitors and lorry drivers. Separate storage takes place for cleaning chemicals, lubricants and waste. Two entrances for pedestrians and one for vehicles. There is a documented policy of the security included in F-ENS-NL10040 Risico management beheersplan 2022-03-11 Product en procesintegriteit (TACCP study, last review was used as input for MR Q2 2023., 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. The individuals or team completing threat assessments and food defence plans have the appropriate knowledge. The Team is also the site HACCP team. Awareness training was included in gen HACCP training.

In general appropriate control measures are developed and implemented.

Access is via electronic keys porter on site between 4AM en 11 PM, access control.

However the doors at the loading area were not closed, this way drivers can enter the site further than allowed. The doors were deliberately un-locked so that they remain open. ***Minor NC on 4.2.4***

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 Overzichtstekening Vion Enschede 2023-02-20 and the bezoekersfolder**:**

Production risk zones (based on BRCGS Annex 2):

- Open product areas: low risk
- Enclosed product areas: warehouses and storerooms
- Non-product areas: canteens, laundries, offices nonfood opslag

Contractors and visitors, including drivers are informed of the requirements for the areas they are visiting through hygiene rules, in a folder with Hygiene and safety rules and zoning incl. personal protection to wear in which area. Personnel flows, material flows, services and equipment are placed such as to minimise the risk of product contamination. No high risk, high care or ambient high care production.

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:
Folder “welkom bij Vion Enschede”
Overzichtstekening Vion Enschede

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. Drainage, where provided, designed and maintained to minimise risk of product contamination and not compromise product safety. Machinery piping goes directly to the drains. (   )

There are elevated walkways, access steps or mezzanine floors that are adjacent or above open product, but god control was seen. Ventilation controls in place to ensure good air flow.

No windows could be opened in the processing areas, glass is protected

Sufficient lightning available, a project is running to optimize ths even more.

Doors in good condition, external doors are well fitted and kept closed when not in use.

The washing of equipment is done separated from production. Plastic strip curtains present, clean and maintained.

4.5 Utilities – water, ice, air and other gases

Water is used as: ingredient for the marinade and for cleaning purposes.

Source(s) of water supply:

- Municipal/city (cleaning, handwashing)
- In-house treated (only softened)
- Storage or holding tanks (water used for cleaning purposes only, Temp T min 60°C) this water is warmed up by rest heat generated by cooling equipment

Only potable water is used provided by the mains.

Microbiological or chemical testing is undertaken: min. 3x year
Water testing is completed via compliance checks and microbiology via an accredited external laboratory.

A water system distribution schematic diagram is available.

Sampling points include: sampling points are changing, but include marinade mixing point and hand washing points.

Gas used in packaging: yes
Food gas used for MAP packing:
CO_2 Foodgrade: spec. May 2023
O_2 Foodgrade : spec. May 2023

Compressed air used: yes
Purpose of compressed air use: control of machines and equipment and packing machined ( )
In direct product contact: Y
Air is filtered and dried before use. Monitoring plan on filters was seen.

Checks are done on filter replacement s as part of the preventive maintenance program and are suitable for usage purposes.

No steam is used.

4.6 Equipment

Key production and product-handling equipment include: maintenance recorded and monitored with help of Some sample taken, equipment was included and maintained. Most is maintained by own engineers.

Equipment is suitable and designed for the intended purpose; mostly stainless-steel construction. Conveyor belts are food grade. Hose used for product transfer is registered as FDA compliant for food contact.

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.

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 when stays at the department.

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

Présentive maintenance
Maintenance management system:
Frequency of main checks: depends on type of maintenance and equipment, based on risks/usage en status of equipment.
Notable equipment include: cooling equipment last check was performed 2024-03-01

Preventative maintenance covers all plant, processing equipment and mobile equipment.
Contractor services are used for: , cooling equipment / evaporators 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:

- Cooling maintanance 2024-03-01
- Saw equipment for carcasses 2023-11-10
- Freon installation by incl check PT1000 2024-01-30

Inspection of equipment condition
Inspections for damage and wear are completed for: conveyor belt condition, other equipment on daily basis, is part of SSOP.
Beside this before start up maintenance engineer is “walking” his round in the morning before startup to , to see and hear if all equipment is running ok.

Temporary maintenance was not detected.
Specific attention is given to energy savings such as heat recovery and reuse, water saving, reduction of gas and electricity consumption.

Handover
There is an oral transmission of equipment/situations after maintenance on equipment during or after processing towards production. No proof could be shown, no documented hygiene procedure could be shown that maintenance work will be followed by a clearance procedure. Minor ***Nc on 4.7.4***

Lubricants
Range of food grade lubricants used: .
F MSDS and technical specifications are on site with compliance to NSF H1 and Allergen Declaration

Overall cleanliness engineering workshop
The workshop was well maintained, not directly connected with the production areas. Entry via “regular entry with food brushes and hand wash equipment. There is also a dedicated rest room, changing room and wand wash present.
New project is running to refurbish the maintenance offices.

4.8 Staff facilities

Changing facilities
Designated changing facilities for staff in place that are appropriately sited. Sloped lockers observed for storage of outdoor clothing, and a separate area for protective clothing.

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

Handwashing
Hands-free operable handwash facilities located in lobby area 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
Two rest room areas for food storage and eating; catering facility in place. Fresh meals are cooked on daily basis. No (white) working jackets are allowed to prevent contamination risks. Good controlled

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 available and documented in: **document : portal**

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: seen and

All chemicals as sampled are suitable for the intended application.

Waste handling and spillage control is effectively managed.

4.9.2 Metal control

The following type of sharp metal equipment is used: knives (Stanley and fish). No snap-off blades used.

An example was seen on the factory inspection and observed to be in a satisfactory condition.

Knife check performed by operation management, also included in SSOP

Condition and integrity are monitored: by QA/QC on monthly hygiene audits; see section 3.4.4 for details.

Staples, paper clips and drawing pins are not used in open production areas. Observed bags and boxes were glued or stitched.
4.9.3 Glass, brittle plastic, ceramics and similar materials
Monitoring of glass/brittle, plastic and ceramic items is done through glass inspections 4x year. Records were seen for: 2023-12-07, 2023-09-30, 2023-07-06, 2023-03-21, Besides these quarterly audits, inventory is checked daily (SSOP) and extra checks are performed by QC. Last round performed and recorded on record**:** today. 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) Windows are protected against breakage with foil.
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 allowed (and present) in packing areas, only at the site of enclosed products and not near open product areas. Wooden pallets used were observed to be in good condition. Some packaging may be delivered on wooden pallets but re packed so no wooden pallet is used in the near of open product.
4.9.6 Other physical contaminants
Describe any other specific controls on physical contamination such as packaging: De boxing and debagging procedures include controls for physical contamination. When packing material is brought in, the to use amount is temporary stored in yellow crates, to avoid contamination risk by carton/ other packing material at the packing line (in near of open products). However, on top of the packing line a carton box was placed with plastic trays which can pose foreign-body contamination risk of the meat at that line. ***Minor NC on 4.9.6.3*** **Management of portable handheld equipment:** Metal detectable pens are in use mobile phones only by management used. Testing equipment is situated in a separate area away from production of open retail products All checked on daily basis by SSOP rounds and extra rounds by QC . 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
Metal detection (products) and X-ray (to determine fat%) applied. Also visual inspection is applicable, as employees are trained to detect FB's such as small pieces of bones /tendons and e.g. plastic pieces. When foreign materials found these are collected and evaluated. Testing metal detection and X-ray detection using methods and samples compliant with commercial specification as well as the sensitivity of control measures is appropriate as determined through validation study.
4.10.2 Filters and sieves
No filters or sieves used.
4.10.3 Metal detectors and X-ray equipment
Detection equipment (metal detection) is installed as result of the risk analysis and is controlled as CP, recorded on F-ENS-NL-10023 in cutting department and on F-ENS-NL-10036 in vacuum (skin) pack department for retail. Based upon risk analysis metal detector devices are placed in the cutting department, also in the sorting and labelling department. After these departments, meat can be sliced and packed, and there are also two metal detector devices in the packing department. The x ray device is behind the detector in the cutting department but for fat% measurement. No removal or detection of foreign bodies with the Xray. Metal detection is arranged as a system with an alarm and a belt stop at the production lines and/ or rejection system. The sensitivity of control measures is appropriate as determined through validation study .Tests are done with 3 types testing rods in the cutting department: Fe 10,0 mm; Non FE 7,1 mm; RVS 316 8,7 mm, and in the packing department: Fe 4,0 mm; Non FE 4,0 mm; RVS 316 4,0 mm. The testing procedure is found to be suitable. No history of failed (metal) tests recorded.. Correct operation was observed in line with the work instruction. Corrective actions are clearly defined in the CP control plan. Data is maintained in documentation. The sensibility of the detector is justified. An automatic rejecting and alarming system is in place and/ or belt stop and alarm . Escalation procedure in place in case of breakdown incidents. Detected foreign materials are evaluated and analysed by QA. Monitoring frequency metal detection: at the beginning/end of the run, changeover of products and every 2 hours. Metal detection (CP) was tested during this audit, correct performance was seen by trained employees. No foreign bodies detected recently.
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: Documented cleaning and disinfection procedures are in place and maintained for the building, plant and all equipment. Examples cleaning procedures seen included: **P-ENS-NL-10031 11 03 2024** Periodic cleaning activities ”diepte reiniging” are included and manged by QA and main contact . Dedicated contact person of , good contact and regular meetings, this contact is working for 25 years on this location. 1x week Acidic cleaning as scheduled in the “werkschema” 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. Examples records seen: records verified for Jan-Feb-March YTD 2024. Pre-SSOP’s are verified by QC . Cleaning is monitored through: daily start up ckeck by Pre- SSOPS per production/ area. **Environmental verification** Swaps Retail pack department 12 x year 10 samples Swaps deboning 12 x year Listeria 10 samples Agar verification cleaning 1 x 2 wk Retail and the other week deboning, 20 samples per week Water samples 3 x year: sampling plan random incl. tumbling (preparing marinade) Results are shared with departments and management, also included in MR. Limits of acceptable and unacceptable cleaning performance is defined for food contact surfaces and processing equipment: In general good performances were seen in case agar is 3 or 4, (TOO high amount of TPC) a resampling is performed. Areas visited on the factory inspection were observed to be clean and tidy. Specific cleaning operations seen during the audit: cleaning and disinfecting of cutting boards, which was carried out conform work instruction and cleaning agent manufacturers instruction.

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

4.11.8 Environmental monitoring

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

Environmental verification
Swaps Retail pack department 12 x year 10 samples
Swaps deboning 12 x year Listeria 10 samples
Agar TPC verification cleaning 1 x 2 wk Retail and the other week deboning, 20 samples per week
Water samples 3 x year: sampling plan random incl. tumbling (preparing marinade)

Comment on the results of environmental monitoring programme:
Results seen were within specification for January-March YTD satisfactory results. Close and direct communication with representative employee of on site (good and direct communication, short lines).
Also by what's app: photos of situations which are not good cleaned or when agar is too high, direct communication and feedback was seen.

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.

4.12 Waste and waste disposal

Waste is categorized in: **Cat 1 &bones, carton and plastic**
All waste containers were identified with contents. Cat 1 specific in grey containers or with clear identification CAT 1.

Bone collection is situated indoor in special area, this way no birds nuisance.

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:
Trademarked waste materials are: not present

Licensed waste removal was sampled for:
Records of destruction are being retained.

4.13 Management of surplus food and products for animal feed

Category 3 material declared unfit for human consumption, retrieved by which is specialized in the destruction of this type of animal by-products. Trade documents according to Regulation 1069/2009/EC. A register is kept, and legal requirements are met, e.g. separate refrigerated storage and clear identification.

Materials transferred to the animal feed chain: No

4.14 Pest management

Pest control is contracted to
The scope is detailed as: rats, mice, cockroaches, flies and visual inspection point

No internal pest controller applicable. If yes, detail evidence of competence. If no, remove this sentence.

No presence of infestation during the last certificated period or observed during the BRCGS audit.

Routine visits per year: 8x year
Content of routine inspection: 8x rodent inspection visit, 4x flies, 1x year lamp change
In-depth inspections performed: **1xyear PRI performed 2023-11-20**
Frequency is suitable.
Sampled regular visit reports 2024-01-03, 2024 02-16, 2024-03-15 performed by inspector specialist
Documentation was well maintained and visit reports fully completed with actions closed in a timely fashion.

of Vion has been trained also.
Traas dashboard, detailed information, some open action points were seen, but were included/ demonstrably planned in y maintenance.

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, temperature storage of FP is <2°C. This is not required for ambient stable raw materials and packing materials incl. clean empty crates.

No allergens on site

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

Only small stocks of materials are kept on site and stock rotation is via the ERP system managed. FIFO usage when possible, but as the shelf life is short and most products are produced based on client orders, FIFO or FEFO is not always applicable .

Delivery/Storage record sheets are in place for each raw material & packaging item and are kept at their storage location; seen within the traceability exercise with no issues noted.

No outside storage.

4.16 Dispatch and transport

The transport of finished goods is all outsourced to external service providers. There are no company vehicles. An overview is maintained in the site approved supplier list. Verified GFSI certification of: Temperature checks and hygiene monitoring controls are in place for: unloading raw materials and loading finished product (identified CCP, see chapter 2), all recorded per batch. Records of evidence were reviewed during the factory inspection during these audit days and and through the auditor vertical audit. Vehicles back directly onto loading bays, which are closed with shutter doors when not in use.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.10.2	No filters and sieves applied
4.10.4	No magnets applied to control / prevent product contamination. Method not suitable for this sector.
4.10.5	No optical sorting
4.10.6	No packaging in glass jars, cans and other rigid containers.
4.10.7	No other foreign-body detection and removal equipment
4.11.7	No CIP cleaning applied. Brine storage tanks are cleaned using manual flushing programs.
4.13.1	No customer-branded surplus food.
4.15.5	No outside storage

5. Product control

5.1 Product design/development

The product design/development procedures are clearly detailed in: **P-ENS-NL-10070xx 2023-02-06**

No specific prod development, mostly minor product adjustments of products/ labels/packperformance, portion size or marinade, all on request of clients.

There is a process of defining the product brief and agreeing the brief with external customers. HACCP review and sign off, sample agreement, trail review and customer sign off.
The sign off within the company is spread between PD of location Groenlo and Enschede. Some products are collected in location Groenlo Retail to deliver at the DC of the client in one groupage truck. Beside retailers also wholesalers are delivered.
A form F NL Food 10065 Monsteraanvraag (sample request) which is used in case of a client request for another kind of product. This was checked for # and # , product runder rollade), art contr # 2023, process is not fully closed yet YTD 2024-03-19.

HACCP team involvement and agreement on customer requirements:
Communication with PD based at Vion Groenlo retail is performed by QC (HACCP team member)
HACCP reviews are held annually and include HACCP assessments made by the HACCP team leader The HACCP team also consider any amendments to standard processes.

The QC manager (HACCP Team Leader) reviews process specifications and agrees/discusses information areas with customers before final agreements are made.

Trials:
Trials are agreed between the QC/ Sales contact and Development Manager and customers, this is all customized (depending on type of development).

Shelf-life validation:
Shelf-life verification and evaluation details have been verified for 2023-March 2024 YTD. All ok

5.2 Product labelling

The following documentation describes the process: P-Ens-NL-10039 2020-01-03 Labelling procedure

Day batches are created for meat preparations and minced meat products. All other meat which is only portioned and packed, the original batches stay on the final packing incl .the shelf life is depending on the original day of cutting (deboning). However the label says “pack date which is eventually the deboning date. But this method of shelf life date defining is all laid down in specification system and interpretation. *See also minor NC on 3.3.2*

Legislation in countries of sale:
Labelling product for EU-market following EU-legislation and any additional customer requirement. No markets outside EU for this kind of products produced at this Vion site. In storage no none-labelled goods allowed.

Suitable cooking instructions are limited applicable; only for retail-packing. Seen in the right way.

Seen several right labelling of B2B packing.

Artwork approval & accuracy of information:
The artwork approval and legality of customers' labels is the responsibility of the customer – they are supplied to site by the customer. The QA / QC Manager will still review the label contents.

No allergens on site used.

Cooking instruction validation procedures:
Cooking instructions are demonstrably performed, but most of the time provided by the clients as in foreign countries, these instructions vary. These instructions are included in specifications and product development process.

5.3 Management of allergens

No allergens handled onsite, this is also communicated with product development and sales in case new marinades are introduced, to look for ingredients without allergens. Risk of allergens is part of the risk analysis. Measurements are arranged in hygiene rules and visitor rules e.g eating/ drinking without company clothes only in the canteen, and handwashing before entry. Corr contamination with possible allergens is defined as low risk.

5.4 Product authenticity, claims and chain of custody

Product authenticity is detailed in: Risicomatrix Food Fraud last adjustment P-ENS-N-10057 2024-01-23

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. Examples include:
Bio material <50 low risk, .No high risk identified (> 100)
Appropriate mitigation measures are developed and implemented, which include:
Herb /spices, trusted GFSI certified suppliers: risk <50
External storage risk GFSI certified <50

Review of the vulnerability plan is programmed to be reviewed annually, included in yearly MR.
Date of the last review: 23/01/2024

Claims:
Simmentaler (specific race of beef) site is FS PIA certified
Annual Skal audit (BIO) took place 2023-10-09, no remarks.

5.5 Product packaging

The packaging materials for finished products are: **plastic bags and foil, for vacuum pack, trays (plastic incl. top foil, in liners in crates**

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

Specification and declarations of conformity seen for the vac, foil (trace test) provide by , , tech spec and DOC available and up to date

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

The testing programme is outlined in: **P-ENS-NL-10067 29-02-2024 b**ased on P-Food 10009 created and maintained by HQ.

A plan of analysis is available and systematically followed. Product samples are taken from production at the line.
No laboratory present on the site. External analysis via ISO 17025 accredited. (-).
Product monitoring based on Regulation 2073/2005/EU laid down in procedure P-FOOD-10008. Both food safety criteria and process hygiene criteria set by legislation are translated to the monitoring program as reviewed based on sampling.
Listeria positive swabs found during monitoring of production areas (internal requirement). .
Comprehensive action plan on cleaning is observed.

Types of tests and frequency:
Daily Salmonella snippers poul 60 sample
Weekly trimmings 80/10 80 list STEC, TPC / Entero's
Weekly parts (veredelde delen)TPC and Listeria
TPC, E. coli, Salm, for meat preparations e.g. minced meat
1x year DNA test
Shelf life per product type 1 x year

Environment
Swaps Retail pack department 12 x year 10 samples
Swaps deboning 12 x year Listeria 10 samples
Agar verification cleaning 1 x 2 wk Retail and the other week deboning, 20 samples per week
Water samples 3 x year: sampling plan random incl. tumbling (preparing marinade)

Results are shared with departments and management, also included in MR.

Summarise test result outcomes / trends and actions taken: no issues.
Seen in MR Q4 KPI's micro, example Log TPC for minced meat KPI log 4.4: result av. For Q3 and Q4 log 4.3 .

Confirm process and frequency of shelf-life testing verification: 1x year per type product
The most recent shelf-life validation was seen for the:
Shelf life test runderrollade2023-11-24 ok
DNA test 2023-10-28, OK

5.7 Product release
No specific pos. release. For selected clients there is a positive release request on microbiological values (Listeria absent, E. coli O157 absent) on raw materials, selected and tested before deboning. No such clients at the moment.
5.8 Pet food and animal feed
No pet food produced.
5.9 Animal primary conversion
No animal primary conversion.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.6.5	No laboratory on site.
5.8	No pet food
5.9	No Animal primary conversion

6. Process control
6.1 Control of operations
Process control was evaluated in all process steps incl. packing and change over. **The following evidence was reviewed:** During the onsite audit evaluated: • Unloading and reception of (hanged) parts of carcasses, incl .CCP temperature check and CP pH check • Deboning of meat • Cutting of meat • Slicing / portioning of meat • Determine fat% by the eagle (x-ray) • Deboning of beef, metal detection, vacuum packing of beef, B to B labelled and packed in boxes

- Vacuum packing of minced meat, labelling and metal detection
- Managing of packing material
- Managing of Cat 3 material
- Managing of clean arrived crates and used dirty crates
- Marinating by tumbling meat
- Storage of chilled meat (packed in crates, foil, boxes)
- Mincing of meat
- Slicing and portioning of meat
- Label check with specifications and client requests
- UBD defining/ label print check
- E-weight control checks
- CP metal detection check on retail products
- Sleave and labelling of packed consumer products.
- Storage of FP at <=2°C
- PRE-ssop and SSOP checks
- Control checks before loading on product temperature (CCP) and trucks order ok
- Chemical storage (for cleaning purposes
- Maintenance of during processing

Documented procedures and work instructions are in place that ensure consistent product is produced and packed.

There are dedicated logs for each process which include traceability, process steps, process parameters such as times, temperatures and volumes, additions, recipes, quality testing and results, set up approval (release) and packing.

The product is subject to CCP and CP checks and these were seen (see details below at evidence).

No products outside of the scope are handled.

The following evidence was reviewed:
Process control was evaluated in all process steps including packing and change-over; changeover of Batch delivered carcasses to be deboned was evaluated and also retail packing and labeling

6.2 Labelling and pack control

There is a clear process and line clearance check for labelling and removal of labelling from the line at a product change over.

Records of checks were sampled from previous days and from the vertical audit trail.

Verification of labels is 4 eye principle, manual check which is recorded.
There is no online verification equipment for the correct label.

The process for back label printing was looked at with checks on coding incl. bar code and best before date undertaken and recorded.

The following evidence was reviewed:
Flat iron steak # label check start- plus finish check and new product checked at start (incl change over Runderlap label check Art UBD , ok

6.3 Quantity, weight, volume and number control
Weight control is on e- weight (average weights (gram)) for packaged retail products as seen on the factory inspection and within the trace exercise and satisfactory. E-weighing is done at the packing department and is described in F-ENS-NL-10001. Licence is in use since 2011-04-27 of NMI. Most goods in packing area are on e-weight. Also some type of meat can be packed with the nominal weight on the label. E-weight control was checked for Runderlap label check Art UBD No bulk quantities are sold. Check weigher online are used for real product weight incl. price labelling, verification start during packing and at the end, ok

6.4 Calibration and control of measuring and monitoring devices
Calibration procedures ensure relevant equipment is identified and regularly calibrated on calibration form F-ENS-NL-10020. There is a monitoring and registration system for the temperature in cooling / freezing cells and production areas. Calibration of the temperature equipment is outsourced. Temperature devices (hand thermometers CCP and CP related) and scales (legal issue) were sampled and found calibrated 6 times a year. Calibration of the chemical dosing systems used for cleaning equipment is managed by the cleaning company . There is a clear schedule of calibration for all equipment. The records of calibration were checked for: • Floor weighing unit 20-01-2024 • Thermometer CCP exp. 19-02-2024 • Thermometer retail #994 2024-04-19 • Metal detector retail Line 8-06-2023 • Metal detection snippers 90/10 19-01-2024 • The inline X ray (fat measurement) is calibrated daily by TD seen 16-03-2024 • weight unit 1 retail 20-12-2023 • Table scale e-weight 18 Nov 2023 • Gas measurement retail19-03-2024 • pH meter incoming goods 15-03-2024 (1x wk) Clear records of calibration were seen within defined limits for all the equipment sampled.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.2.4	No on-line verification equipment used.

7. Personnel

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

The HR department has its own Quality Manual, also centrally for VION locations. Training is a relevant part of the Manual. For temporary personnel, for flex, for key personnel. Records are maintained in personnel files and in an excel-sheet (seen overview 2024 ytd)
HR manager is “shared “with Vion Groenlo. HR officer is dedicated for this site.

There is evidence of introduction training for new starters and refreshment training of employees. Personnel hired via an agency is currently a challenge as scarily available. Each agency has a job coach to assist and guide its personnel so many coaches in the house, all trained on hygiene policies and safety policies as well. HQ is responsible for contracts with agencies. Competence training had taken place for the staff sampled (food safety and quality).
Day 0, a guided tour is performed, to introduce the company and it habits, incl. the induction-film and training (provided in 12 languages). A good overview of given training per person is in place.
After that, all employees do have to pass a test (after an instruction/training video) on the hygiene rules before starting the contract. This HACCP training (HACCP test) is every two year repeated). Seen personal training records for several key personnel on Metal detection, HACCP test, Instruction “Werken bij Vion voor Flex”, CCP temperature, Training SSOP, Internal auditor/“Interne audit training” of by 2012-08-28, HACCP update course. There are two xlsx -files to demonstrate education and training on competencies and on training: “Invoeren opleidingsoverzicht” and “Personeelsmatrix”.
Recently the VOS team of Enschede was trained in Grmany (on another Vion company by a Vos trainer). This, to handle the VOS system for improvement purposes on daily basis.

All workers (including contracted workers) are trained in Food defence. Principles of Food hygiene and food safety, Health and personal hygiene and Produce safety standards. All personnel engaged in activities relating the production has followed relevant training. Verified training records including CCP/ HACCP training, allergens, food defence and food fraud) and cleaning.Training will be given once every year. In case of new employees these will be trained prior to enter the production area by the QA manager himself. Employees sign for the house rules prior to start working as well

The following evidence was reviewed:
Employee # meewerkend voorman metaldetection, e weight, gas measurement HACCP 3-8-2023 machine instructions every year,
13 feb 2023 MAP measurement and CCP
HACCP3-8-2023 metal detection, E weight
HACCP 5-09-2023
HACCP
9-01-2024 HACCP leidinggevende 13 Feb 2024 CCP training 10003 version 8
11-09-2023 HACCP leidinggevende

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 and a folder is given with the

Hygiene rules

Adequate facilities in place. Only to enter with a batch Handwashing takes place at entry of the production area and warehouse area. No issues observed regarding handwashing stations. Staff hygiene 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:
In practice seen every day on site during the audit, good control

7.3 Medical screening

Employees, visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Procedures are established for personnel to notify management of infectious conditions they may be suffering from or been in contact with.
The site makes all visitors, new starters and contractors aware of the need to report infectious disease during the intake by the porter before entering the site. The health and safety service physician signs declarations for each personnel under contract of VION Enschede. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.
Personnel should report the use of medicine to their direct leader according the house rules in the contract. Dutch law ensures basic income in case of absence due to illness.

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 used in production processes which is defined clearly where to use. Disposable hair/beard nets and/or Astro caps available for employees and visitors.

Safety shoes/boots also provided. For visitor's coats, shoes/boots and hairnets are provided.
The laundering of protective clothing is outsourced to a contracted and specialised laundry .
The wearing of sleeves, aprons, gloves and work coats isn't allowed during eating and smoking.

In cold areas since a few weeks, balaclava's were provided and worn. These balaclava's were black and not fully covered. The balaclava's were found not included in the laundry operation procedure. ***Minor NC on 7.4.3***

Segregation of clean and dirty clothing is effectively managed; there is a dedicated closed bin for dirty clothing. Clean clothing is provided in a dedicated locker by the laundry service provider. Free provided every day. When needed sleeves or skirts

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.