Audit Report

Global Standard for Food Safety Issue 7: July 2015

1 Audit Summary

Company name	**Vion Food Group**	BRC Site Code	**1768974**
Site name	**Vion Boxtel BV**		
Scope of audit	**The slaughtering of pigs and the deboning and cutting to specification and packing in bulk and consumer packaging of chilled pork, including Good Farming®-meat.**		
Exclusions from scope	**The intestinal washing process.**		
Justification for exclusion	**Segregated process with clearly differentiated products**		
Audit Finish Date	**2017-06-14**		
Re-audit due date	**2018-06-28**		

Voluntary modules included

Modules	Result	Details
Choose a module	**Choose an item**	
Choose a module	**Choose an item**	
Choose a module	**Choose an item**	

2 Audit Results

Audit result	**Certificated**	Audit grade	**A**	Audit type	**Announced**
Previous audit grade	**A**	Previous audit date	**2016-06-03**		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0

3 Company Details

Address	**Boseind 10** **5528 RM Boxtel**		
Country	**The Netherlands**	Site Telephone Number	**+31 0 658196411**
Commercial representative Name		Email	**@Vionfood.com**
Technical representative Name		Email	**@Vionfood.com**

4 Company Profile

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

Subcontracted processes	**No**
Other certificates held	ISO9001, IKB, Tesco approved, QMS, QS, Better life 1 star, Chain of custody
Regions exported to	**Europe** **Asia** **Oceania** **Other** Choose a region Choose a region
Company registration number	**EG 61 NL**
Major changes since last BRC audit	**New metal detection device vacuum department. Replacement of metal detection to cold department. Change of transport belts and changes in lines and production process. Day coding with colours, New MES for weighing. Purchase from sister company, cutting of product in slaughter house.**

Company Description

Vion Boxtel BV is the biggest processing plant of pigs to meat and meat products in the Netherlands. The company is part of the Vion Food group. The company is slaughtering about 19.500 pigs per day. Main customers are the retail plants of the Vion Food group (Vion Groenlo, Distrifresh) and the bacon plant for the British market and Asia (Vion Scherpenzeel), as well as companies producing for large retailers, such as The company also delivers directly to retail international and industrial customers. Legs are particularly produced for Spain and Italy. All pigs are bred by Dutch farmers and reared conform the Good Farming principles (IKB); a part of them are also reared regarding special Welfare demands. The company has a system (Green label) to comply with welfare demands. The company has ca. 1100 employees with a possible extension to 1530 workers. A considerable amount of the employees is working at a temporary base in 2 shifts. Most of them are from East European countries such as Poland. There are interpreters in the company for communication purposes. The company is certificated for ISO 9001 as part of a multi-site ISO system. Vion Boxtel is officially approved for export of pork meat to several third countries (e.g. Japan, Korea, Russia, Canada, Africa, China, Australia, China) The surface is 15.0 K sq. metres. The used quality system is based on one HACCP-study. The pork is packed at semi-bulk level and there are some vacuum-packed consumer goods. EG number is NL61 EG. Website: www.Vionfoodgroup.com

5 Product Characteristics

Product categories	**01 - Raw red meat** Category Category Category Category Category
Finished product safety rationale	**Chilled red meat, short shelf life 5-8 days and chilled red meat vacuum packed, short shelf life 14-21 days**

High care	**No**	High risk	**No**	Ambient high care	**No**

Justification for area	**No high risk or high care production assigned on site. All products undergo full cooking prior to consumption**
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	**Welfare (GB = Good Farming Bacon) and BLK 1star (FS = Good Farming Star)**
Product recalls in last 12 Months	**No**
Products in production at the time of the audit	**Raw red meat of pork from slaughtering till primary cutting: half carcasses, legs, shoulders, middles, bellies, necks, loins, 80/20 meat, minced meat, organs**

6 Audit Duration Details

On-site duration	**24 man hours**	Duration of production facility inspection	**12 man hours**
Reasons for deviation from typical or expected audit duration	**No**		
Next audit type selected	**Announced**		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	**2017-06-12**	**9:00**	**17:15**
2	**2017-06-13**	**9:00**	**17:15**
3	**2017-06-14**	**9:00**	**17:00**

Auditor (s) number(s)		Names and roles of others
Auditor Number		
Second Auditor Number	**N/A**	

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 1.1.9)				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
/ Plant Manager	**X**			**X**
/ QA manager	**X**	**X**	**X**	**X**
/ Department manager slaughterhouse		**X**		
/ foreman Slaughterhouse		**X**		
/ assistant Technical department	**X**		**X**	

/ Department manager cutting department		X		
/ Department manager veredeling department		X	X	
/ Foreman Packing Asia		X		
/ Department manager veredeling department		X	X	
/ Production manager veredeling and packing department	X	X	X	X
/ Retouren and incoming meat				
/ facilitair manager			X	
/ Production manager Internal logistics and packing Asia	X	X	X	X
/ Team leader Expedition/Logistics		X		
/ Employee QA department			X	
/ Manager HR	X			
/ Production manager Slaughter- and cutting department	X	X	X	X
/ Foreman veredeling		X	X	
/ Foreman Cutting department		X		
/ SRS employee		X	X	
/ Financial Controller				X

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	**Clause**	**Details of non-conformity**	**Critical or Major?**	**Anticipated re-audit date**

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	3.4.1	For internal audits it is not provable that all activities are covered throughout the year. Besides the unannounced intercompany audit in 11-2016 (which does not contain all activities but is based on	In the next audit (An unannounced) planned in October 2017, the new template will be used by an instructed auditor.	Due to the fact that the internal auditor assumed that the planning was part of the report, not all planned activities were reported.	Send evidence by mail: Minutes of discussed item during QA meeting 4-7-2017 and template	2017-07-09	Closed by Follow up will be given to planned execution of audits

		hygiene) an audit was only executed 4-2016 and 5-2017. The TD was planned 5-2017 but not documented and site standards (besides fundamentals) were not provable audited in 5-2017.		The processes will be added to our audit report template. Also will be confirmed if the audit was performed as planned. On 04-07-17 in the annual internal audit meeting these items will be discussed and implemented.	including planning internal audits		throughout the year.
2	4.4.5	Junctions in the corner of the Asian department and several junctions in the room behind the Asian department contain dark spots (moulds?).	These junctions where cleaned at 14-06-2017	It seems that the Pre-ssop in these areas was not performed properly. We adjusted the instructions for the Pre-Ssop. And reinstructed our staff	Evidence send by mail: Instruction for notification of dirty junctions	2017-07-09	Closed by Follow up will be given to clean junctions next audit
3	4.4.11	PRE SSOP are executed to detect broken glass and plastic in the production environment. In general this is good arranged but a few chatter proof protections were seen cracked: a light	The lampshades where replaced the same day after production	The light bulb nearby line 1143, broke during condense wiping and was reported immediately to the cutting department,	Evidence send by mail; Instruction for notification of broken chatters.	2017-07-09	Closed by Follow up will be given to practice

		bulb nearby line 1143 at the cell with hanging meat parts, 3 bulbs at the organ department, one at the room were the organs are cleaned and cooled and a bulb at the dirty slaughter. These were not documented during the daily PRE SSOP.		recorded on the Ssop and reported to the maintenance to repair it the same evening. We adjusted the instructions for the Pre-Ssop. And reinstructed our staff			
4	4.6.2	The white food grade transport belt of the speed batch equipment losses white fibres.	The loose white fibers are removed, and the already produced product are checked. However the maintenance told that the belt was replaced, the new belt was still in our warehouse, replacement was planned already, but not yet executed.	It seems that the belt scraped on the frame, when it broke, the loose fibers where not noticed. The belt will be replaced, meanwhile there will be an additional check on the loose fibers.	Evidence send by mail: photo of the replaced transport belt	2017-07-09	Fully closed by
5	4.14.8	Not provable is that corrective actions were carried out after the PRI inspection of 11-2017. The actions taken were not documented.	The corrective actions from the inspection on which we agreed where carried out. These are recorded now.	Due to the fact that we asked for an adjusted inspection report, which was not provided, the already performed corrective actions were not documented. The facility manager , will react more	Evidence send by mail: documented corrective actions taken on PRI	2017-07-09	Fully closed by

				directly to the remarks of inspections and the remarks will be added to the digital system, with the corrective actions.			
6	4.15.1	Red crates and blue dolavs (to be used without inliner) are delivered by a cleaning supplier. The crates and dolavs used during the audit which were filled with meat were wet inside.	The wet substance was tested , to check if there were any residues, which showed the absence of residues. We also contacted the supplier to confirm these where fresh washed crates.	It seems that the crates were not fully dry after the cleaning and disinfection of the crates. We started to send complaints and with the central office, we contacted the supplier of the crates to check if their process can be adjusted to deliver dry crates.	Evidence send by mail: Written complaint to the supplier	2017-07-09	Closed by Follow up will be given to practice (dry and clean crates and dolavs)
7	4.16.1	In general transport is good arranged including risks of cross contamination, but during the audit it has been assessed that: -a stair was standing on the foil in the truck during the filling of the truck. - meat with possibility of dripping was transported	The stair was removed and new foil was placed in the truck. The liners were placed correctly on the dolavs	The staff which placed the stair on the foil was not fully aware that also stairs we not to be placed on the foil, they are reinstructed. Due to the fact that more dolavs are	Evidence send by mail: Instruction to staff about the correct use of foil and photograph of the correctly placed dolavs	2017-07-09	Closed by Follow up will be given to the execution of the corrective actions, no risk of cross

		above partly covered crates and over dolavs at the "veredeling".		delivered to the veredeling and more front peace's , we did not notice the possible contamination. We adjusted the plan of filling the cold store, that dolavs are only placed under shoulders and frontends. Therefore the liners and dolavs can't come in contact with the meat hanging above.			contamination
8	6.2.3	Documented procedures for label control are in place but not correctly executed: -Tare was incorrect labelled at the cutting department -The records of 12-6-2016 for label control were not signed according to the frequency as mentioned in procedure at the Packaging department.	The small boxes are all checked and if needed a new label with the correct tare was placed.	The tare was incorrect programmed in the system, at the cutting department. The data on the labels of the packaging depart was checked, but forgotten to be recorded. Because there was no instruction file, some of the staff	Evidence send by mail: New checks for correct use of tare and check of label control	2017-07-09	Fully closed by .

				could not perform the label check thoroughly. Therefore we created an instruction file which is displayed at the checkpoint and altered the label checklist.			

Comments on non-conformities

Voluntary Modules Non-Conformity Summary Sheet

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company has a management team which meets regularly. Formal communication meetings are held at several levels within the organisation; weekly MT (Plant manager, 3 production managers, HR manager, Controller, QA manager and TD manager, Planner), daily level 1 (department managers, planning, F&A, QA, HR, FD and TD)), 3-dayly Team huddle (department manager, team leader and operators). Records seen: Minutes of meeting MT report of 6-6-2017, planning boards and action lists.

Food safety and Quality is part of the policy "Passion for better food" P-BXT-NL-10126 and signed by the plant manager on 12-4-2017.

Relevant Quality Objectives for 2017 have been defined for Safety, People, Delivery and Costs. More specific: eg. reduction of complaints, waste control, training of staff, optimising of quality and efficiency besides several projects.

The management review is kept at a yearly base, a clear management review June 2015 – June 2016 is demonstrable and discussed during the MT meeting of 12-9-2016. The review contains the verification of the HACCP system, complaints, the review of the objectives, training activities, changes and the preventive and corrective actions.

The management review contains also evidence for continuous improvement (e.g. PDCA cycle, projects and microbiological analyses by).

The 9 non-conformities identified at the previous BRC6 audit against the Global Standard for Food Safety are effectively corrected: the minors were fully closed. (New deviation raised for cracked covers; organisation has hundreds of bulbs and corrective actions were sufficiently executed last time by inspections and hygiene audits for the one cracked cover identified last year)

1.2 Organisational structure, responsibilities and management authority

The organisation is defined (Organogram 25-4-2017). is Site Manager from Vion Boxtel BV. The departmental managers directly report to the Site Manager. The Key staff (Controller, HR Manager, Planner, Coordinator QA, Manager TD, Manager Service Bureau and the 3 production managers) directly report to the Site Manager.
All staff personnel have job descriptions. They give the summary, essential duties and responsibilities, prerequisites, physical demands and work environment. Assessed for "Voorman Azie" dd. 11-2014.
Procedure P-BXT-NL-10247 describes the arrangements for absence of staff.
There is a matrix in place for the production personnel to cover their experience and responsibilities.
Performance of personnel is monitored day to day with a formal review during the appraisal system.

Details of non-applicable clauses with justification	
Clause reference	Justification

2 The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical and physical risks for all steps in the production process, packaging material and general elements. The HACCP analysis is carried out by the group QA department of the Vion Group and the results are locally translated to the process control plan for the plant Vion Boxtel BV.

The QA manager is the food safety team leader; he`s sufficient educated and experienced. Food safety team meetings are on request, but the team leaders of the safety team are also part of the MT (multidisciplinary composition) which meets weekly. (P-BXT-NL-10183, dated 18-7-2016)

The prerequisite programme is part of the QMS system and is based at EG 853 and EG 854 requirements. Verification by the daily pre-SSOP and SSOP checks.

Different product groups are distinguished (Procedure Products Boxtel P-BXT-NL-10.170, dated 9-1-2017:

- Fresh pork meat;
- By-products (category 3);
- Destruction material (category 2);
- Partially chilled pork meat (50% / 70%).

The intended use of the product by the customer has been clearly defined. No specific groups are applicable. The intended use is business to business meat products and a few vacuumed consumer products (Italy).

The company has defined 8 Critical Control Points (CCP's) relating to product safety and the scope of the BRC audit following P-FOOD-10000, dated 29-9-2014:

1. Faecal contamination of carcasses (Zero tolerance for visible faecal contamination);
2. Temperature control of animal by-products at dispatch <= 3°C vacuum <=2 °C;
3. Temperature control of fresh / vacuum packed pork meat at dispatch <= 7°C vacuum <=6 °C, organs <2 °C);
4. Temperature control of partially chilled pork meat (50%) at dispatch, <= 31,2 °C ;
5. Temperature control of partially chilled pork meat (70%) at dispatch <= 21,9 °C;
6. Temperature control of fresh pork meat at reception <= 7°C
7. Temperature control of returned animal by-products at reception <= 3°C;
8. Temperature control of returned fresh pork meat at reception <= 7°C.

The Hazard analyses of Vion Boxtel BV is documented as P-BXT-NL-10116, dated 15-11-2016.
Flow diagram is prepared and available on VION on-line: P-BXT-NL-10248 from 4-4-2016. This procedure includes 6 flow diagrams: Entering pigs, Clean slaughtering, Chilling/ cooling, Cutting, Packing, Expedition.

Validation takes place of changes in products or processes, which may affect food safety aspects. Verified for the cooling of organs, report assessed from 29-3-2016 and validation of clipped Neck developed 30-11-2015.
Daily verification is part of the production process and assessed. The verification report of period July 2015-June 2016 dated 15-7-2016, as part of the management review is seen. Corrective actions are discussed in the MT-meeting.

Details of non-applicable clauses with justification

Clause reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

The company has a Quality Manual, complying with ISO 9001 and BRC 7 requirements, which states the company's commitment to quality and food safety. The quality manual is the total of all quality documents,

including procedures, work instructions, HACCP analysis and registration forms.

3.2 Documentation control

An electronic quality manual named ' ' is in place. Changes in old versions of documents are maintained.

3.3 Record completion and maintenance

Records of the following controls are verified: SSOP, pre-SSOP's, CCP checks, the new CP checks (including metal detection). Records are retained for at least 2 years at the site (and 5 years elsewhere).

3.4 Internal audit

There are detailed schedules of internal audit against documented procedures, carried out by trained independent staff (Vion sister company employees). The audits have been carried out close to schedule and corrective action has been taken in a timely matter.

Twice a year the production sites and involved departments are audited. There is a schedule for the internal audits according to procedure 'interne audits' (P-VION-10011). The audit frequencies are based on the risk of the activity to the business, the operation and the customers. A hard copy of internal audit reports is maintained.

Non-conformities are clearly listed with their corrective actions. Nonconformities seen for audit of 18 and 19-5-2017 and the unannounced audit of 4-11-2016. (Vion audit) including verification of the nonconformities of 24/25-4-2016. Results of the internal audit are reported to the personnel responsible. Minor and Major nonconformities which arise are documented following the internal procedure. The corporate quality department has to accept the action plan suggested. Detailed records of former internal audits are available.

Minor NC: For internal audits it is not provable that all activities are covered throughout the year.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

The management of suppliers is a corporate responsibility within the Vion Group.
Vion Farming is taken care for the suppliers of livestock (pigs and cattle) documented in P-NL-Food 10157 and verified for product delivered (trace test and during the audit by).
Purchasing processes of raw materials (ingredients) and packaging materials are centrally managed via approval procedures and contracts. The Vion plants are only authorised to order products or services from approved suppliers:

- Procedure supplier's audit' (P-FOOD-10023);
- Procedure food supplier assessment' (P-FOOD-10025)
- Procedure requirements products and services' (P-FOOD-10026).

There's an audit plan for external suppliers, based on risk management

3.5.2 Raw material and packaging acceptance and monitoring procedures

Livestock deliveries are checked at their requirements by an administrative check of the delivery documents before slaughtering. A veterinarian check at animal welfare and health aspects is carried out by the local veterinarian (employed by the government).
Vion Boxtel BV is also processing meat, delivered by other Vion plant in Apeldoorn (hams). The temperature of incoming meat is CCP6.
Packaging materials is inspected visual during delivery.

3.5.3 Management of suppliers of services

Purchasing processes of transport, storage and services are partly centrally managed via approval procedures and contracts and partly by the site for local deliveries.
The Vion plants are only authorised to order products or services from approved suppliers:
- Procedure requirements products and services' (P-FOOD-10026).

There's an audit plan for external suppliers, based on risk management. Verified for the cleaning supplier, crate washing supplier and local washing supplier of gloves.

3.5.4 Management of outsourced processing and packing

No outsourced processing (subcontracted: freezing of packed product in collaboration with customer.) The cold store is an approved supplier.

3.6 Specifications

Specifications for raw materials, packaging materials, cleaning agents and finished products are available. Samples of specifications taken at this visit demonstrate control. This is verified for:

Requirements article 35273 "Schouder 2D Japan", art 43743 "nek zonder knars gf", art.39253 " Nek ab, ak, Korea Z.gf"
Foil: ' , clips,
Pigs GB Good Farming Welfare and
Cleaning agents: , white gloves.,
The specifications were present and accompanied by food grade declaration when relevant.

3.7 Corrective and preventive actions

In general, good follow up was seen from corrective and preventive actions taken by the company; e.g., complaints, audits, PRE SSOP and SSOP inspections, out of spec analyses, blocked products. Improvement and prevent of recurrence of failures was provable.

3.8 Control of non-conforming product

Clear procedures for control of non-conforming products (e.g. fallen meat, blockades) are in place: P-BXT-NL10131. Products on hold are physically identified as such (red label/tape).

The procedure for non-conforming product defines how non-conforming product is identified, quarantined and disposed of. Only authorised personnel (QA Manager or department manager) is allowed to release products.

3.9 Traceability

Traceability system is well developed. It covers raw materials through work in progress to finished product including packaging materials and distribution according to 'procedure traceerbaarheid' (P-P-Food-10015).

This system is fully based on written documents, batch codes and bar codes:

- Porks bear an earmark (+ accompanied by track record and VKI)
- Half carcasses get an EG-mark + serial number (together with date of slaughter + slaughter line number + origin)
- Technical parts (own production + additional purchase) get a batch code (EG-mark + date of production + origin)
- By-products get a batch code (date of slaughter / production)
- Finished product is traced depending on the date of production + calculation number + serial number of EG-mark (weighing label is scanned at dispatch)
- Primary packaging materials are traced on the date of receipt / breaking into new batches
- Returned product + NAR (destination form)
- Retail (separate cell and label)

During the audit a traceability test was performed on Nek zb zk Korea Z gf (Artnr. 39253) Slaughter date 7-6-2017 (production date 8-6-2017) including mass balance, specifications, process records, (pre shipment) checks and distribution details. The test was performed well within 3 hours, showing a good grasp of tracking and tracing of product and corresponding documentation.
Documents showed during the test: End product specification, CCP training documents, Control on cleaning (Agar and residues), Trend analyse agar control, Distribution documents, Weight lists, Label check, Traceability to slaughter house number, specifications of packaging material, trace on packaging material, monthly trend micro results, SSOP list, PRE SSOP, Verification list CCPs, Monitoring list CCPs, Pre-shipment control list.
Yearly trace tests are documented verified upwards and backwards of 12-1-2017 from Welfare and male pigs.

3.10 Complaint handling

Complaints are received by Sales at central office (Boxtel). Any complaints which are considered to be attributable to the site are communicated and investigated. The procedure for complaint handling (P-BXT-NL-10096) defines types of complaints and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action (corrective / preventive) as appropriate. All complaints are trended and reviewed by the site management team based upon / database and weekly reported (K&M-monitor).
There is a KPI on complaints: 2,65/week integrity and 8,5/ week food safety besides 10 % less complains than in 2015-2016) This is not accomplished at the moment (2015-2016: integrity 2,95/week and food safety 9,45 and at the moment YTD 3,78/week and 11,68/ week but well managed with weekly performance documented and provable actions taken.
In 2015-2016 there were 4871 complaints (not taken into account weight and sales complaints (2014-2015: 4785)). In 2015-2016 there were 255 food safety complaints of which foreign bodies: 48 x plastic (foil, parts of crate, dolav) and 6 x metal.

3.11 Management of incidents, product withdrawal and product recall

There is a company's crisis and recall management procedure P-VION-10015 which covers the process which is applicable for all Vion sites. The procedure for non-conforming product defines 'incidents' and addresses requirements in terms of incident reporting as these are escalated to relevant personnel for review and action as appropriate. Business continuity guaranteed by central procedures and emergency coordination protocol. The local procedure Product recall P-BXT-NL-10024 defines the composition of the recall team and complies with these requirements.
The recall procedure is tested 1x / year (seen withdrawal from 1-3-2017; product with wrong sleeve was packed). Report of this withdrawal assessed. Departmental feedback has been given. No recalls (but one withdrawal) since last BRC audit.

3.12 Customer focus and communication

Bulk products are delivered with product specifications based on customer requirements. Specific cutting requirements are documented in meat specifications assessed at the lines.

During the audit follow up was given to specific requirements from customers; eg specific cutting requirements, best before dates, metal detection requirements on tongue, weight, colours of packaging and specific micro analyses.
Only 2 products are direct delivered as consumer products.

Details of non-applicable clauses with justification

Clause reference	Justification
3.5.3.4	No outsourced processes

4. Site standards

4.1 External standards

Site boundaries are clearly marked and fenced. Separate storage takes place for cleaning chemicals, lubricants and waste. The site is registered by The Food and Consumer Product Safety Authority (official approval EG 61).

4.2 Security

24h security during production days from 06:00 till 22:00 by own trained staff the rest is covered by . There is a system in place with badge control for employees and identification and badge control for visitors and contractors on all potential entry points to the plant. Reassessment Food defence executed 29-7-2016 and documented.

4.3 Layout, product flow and segregation

The processing and packaging areas of the production are well designed and maintained to prevent risk of contamination. Premises are suitable for the intended purpose. Process flow is designed to minimise/prevent contamination and agreed with the Food and Consumer Product Safety Authority. Personnel-, material-, air-, water, waste-, services flows are designed and equipment placed in such a manner as to minimise the risk of product contamination.
No high risk or high care production assigned on site. In the low-risk areas, effective procedures are in place to minimise the risk of the contamination. Plan of 11-5-2017 assessed.

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

The internal condition of the site is suitable and satisfactory for the process. Walls, ceilings and floors were suitable in general. Floors are coated or granite and in good condition. Continuous attention is given to the condition of the floors. False ceilings are in place in manufacturing area, which are full closed. In case of glass windows, these are protected by foil. Suitable ventilation and cooling throughout the factory.

Minor NC: Junctions in the corner of the Asian department and several junctions in the room behind the Asian department contain dark spots.
Minor NC: 6 chatter proof protections were seen cracked

4.5 Utilities – water, ice, air and other gases

Utilities constructed, maintained and monitored to a good level. The water used for cleaning and process is mains water. Testing of water (chemical/microbiological) is incorporated in the testing programme(s) P-BXT-NL-10009 dated 11-1-2017 and P-NL-Food-10.196C.The samples are analysed by , which is an ISO 17025 accredited laboratory ( ). Water quality is defined as a general control measure. A new plan of the water distribution system from 2016 is in place. Tests are executed 4 times a year, last tests assessed from 20-3-2017 and 22-12-2016, with good results.

Air flow is regulated; airflow directly in contact with meat (at cutting department) is filtered. These filters are controlled and changed each 2000 hours. Filter is a EAKC 14 filter with an active coal filter, designed to filter particles to a high level. Specification and replacement of filter is demonstrably performed.

4.6 Equipment

Equipment was seen as suitably designed and used to minimise potential contamination. The used equipment is suitable for its purpose. New equipment is purchased as required and specified, validation report assessed. Food grade / contact compliance documents were seen from the Speed Batcher dated 25-2-2016

Minor NC: The white food grade transport belt of the speed batch equipment losses white fibres.

4.7 Maintenance

Equipment is maintained using the maintenance system ( ). Maintenance consists of 33 employees; mechanics and a manager and assistant manager. Maintenance is also outsourced to established companies within the food and meat business. Registrations to confirm that the preventive maintenance or preventive controls have been carried out as planned are in place. New machines are directly incorporated in the system. Maintenance and activities for disturbances/failures are typically and preferably planned and carried out after production hours or in the weekend. Release of equipment after repairs and/or maintenance are signed off via the (pre)SSOP forms. Repairs/maintenance are communicated with team leaders and other relevant people, as well as the cleaning company, to keep focus on hygiene.

Lubrication is planned and all used lubricants are food grade with a FDA H1 status (food grade).

Maintenance people are trained on hygiene and contamination prevention. A sole washer is present at the entrance of the clean slaughtering department. Main Maintenance Department is separated from the production but in production also a technical department is available named "het bunkertje".

4.8 Staff facilities

Canteen and changing rooms (production and dirty slaughter house) were assessed. Facilities are designed to a good level. Cleaning and maintenance is in good order, to prevent contamination or food safety risks. Outdoor clothing and shoes are stored separately from work wear.

Hand-washing facilities (with hand-free soap tap operation and air blade dryer / single use paper towels) were provided in toilets and at entry points to production areas. Before entering the production areas boot washing and hand disinfecting equipment is installed.

Rest room and catering facilities are provided for staff (,). A HACCP plan is applicable. Smoking is only allowed in a separated area of the canteen. No evidence of smoking was seen during the site evaluation. Proper storage areas and fridge were observed for brought food stuffs. Temperature is checked following Appèl HACCP plan.

No high risk / high care operation

4.9 Chemical and physical product contamination control

Raw material handling, preparation, processing, packing and storage areas

Chemical cleaning agents are well controlled. Good manufacturing practices are in place in production. Storage and application of chemicals are in line with the requirements.

4.9.1 Chemical control

Chemicals/cleaning agents are stored separately and away from production. Authorised access by cleaning company and production department. MSDS available and specifications confirm suitability for use in food processing industries.

4.9.2 Metal control

The HACCP study has determined that metal detection is not necessary as CCP, but as CP. Registration and corrective actions could be demonstrated. A knife handling policy is in place.

4.9.3 Glass, brittle plastic, ceramics and similar materials

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic. Glass / hard plastic audits are regularly carried out by production department (daily pre-SSOP and SSOP) and by maintenance department (1 x / 3 months -). New plans are made for 2017 to use. Glass audits assessed from 21-3-2017 and 7/8-6-2017.

4.9.4 Products packed into glass or other brittle containers

No products packed into glass or other brittle containers

4.9.5 Wood

Wooden pallets are not permitted in production of meat products (only non-food area; storage of packing materials).

4.10 Foreign body detection and removal equipment

4.10.1 Foreign body detection and removal equipment

The HACCP study determined the metal detection step as a CP, not a CCP. Only 2 (direct) consumer products are processed on the premises. Checks are performed every hour. Employees for monitoring are trained by an instruction. During the audit the use and control of the metal detection equipment was assessed at the packing area and area for tongues.

4.10.2 Filters and sieves

Sieves and filters are not in use for product checks.

4.10.3 Metal detectors and X-ray equipment

Metal detection devices are used to check for unpacked products and vacuum-packed products. Appropriate foreign body detection equipment (metal detectors) is in place, calibration of equipment is demonstrable, executed 25-4-2017. Metal detector check is performed correctly, as well as registration of results and, in case of non-conformance, corrective measures.

4.10.4 Magnets

Magnets are not in use for product checks.

4.10.5 Optical sorting equipment

No optical sorting equipment.

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

No glass jars, cans and other rigid containers

4.11 Housekeeping and hygiene

Cleaning is subcontracted and performed by in the evening/ at night after production. Cleaning of equipment is carried out according to documented and detailed cleaning schedules. Procedure for cleaning and planning were assessed.

The effectiveness of the cleaning and disinfection process is followed by hygiene audits (pre-SSOP), agars and swabs for pathogens (e.g. Listeria). Records of checks are maintained and were sampled during the audit, both of as the pre-SSOP lists. Cleaning schedules of are available and cover equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) were also assessed. Registrations are carried out correctly, deviations from schedule are followed up properly, verified for "verdeling week 1 till 13-2017).

Specifications of the new cleaning agents delivered by (consisting of MSDS and food grade certificate) are present eg.

Cleaning is validated 27-5-2016. Dosage units are calibrated yearly by external party and supplier of cleaning agents (last time 11-4-2017). Cleaning agents are labelled and stored in a locked area. Segregation is used for cleaning agents and for internal use by Vion Boxtel.

Analyses are made of the controls for cleaning effectiveness. The results are discussed with and

used for a bonus/malus system.

logbook was assessed, as well as several pre-SSOP's and the agar and swabbing results. Corrective action in case of unsatisfactory cleaning is demonstrable and registered on the pre-SSOP list (distinction is made between direct corrective measure, or repeating cleaning after production). Verification on cleaning takes place (F-BXT-NL-10005).

4.11.7 Cleaning in place (CIP)

A cleaning in place system is used for the cleaning of the blood vessels and tank and the cleaning of knifes and crates.

4.12 Waste / waste disposal

There are contracts with two licensed waste disposable companies:

- Paper-carton and other non-food waste materials ( )
- Category 2 and 3 waste ( )

The waste collection is clearly identified during storage and stored segregated.

4.13 Management of surplus food and products for animal feed

It's the policy of the organisation not to use surplus food for third parties. There are 2 products going to consumers, those products are labelled at the end of the process. Products identified for waste are unpacked and segregated

4.14 Pest Control

New external subcontractor services the pest control since 29-3-2016. Points of attention are:

- Rodents
- Cockroaches and crawling insects
- Flying insects

The frequency of control is 8 x / year; maintenance of EFK is 1 x / year and determination 4 x / year. All documentation is present in the contract map of and electronically. Analyses can and are made from this programme. Maps are available (online) detailing the location of baits / traps, electronic fly lamps, etc. All MSDS and specifications of used pesticides are present. No toxic pesticides are used in the production area. Infestations are reported via the online programme.
Records were seen from 24-4-2017, 6-6-2017 and PRI (in-dept pest control survey).
Trends are available and follow up of corrective actions. Extra actions were taken during pest activity from rats and insects outside verified for 19-5-2017. (Space under the site was renewed).
Minor NC: Not provable is that corrective actions were carried out after the PRI inspection of 17-11-2017.

4.15 Storage facilities

The company is producing fresh meat. The main part of the production is delivery daily chilled. Carcasses are stored 1 day before they are cutted and boned. Storage temperatures are controlled automatically via the system. Used temperature standards are in conformity with the legislative demands about temperature, this is verified for the cooling departments and production rooms (beneath 12 degrees). Production is organised based at the FIFO principle. Production is sold to customer or Vion West who has a subcontracted storage and freezing at and . Both cold stores are BRC-certificated for storage and distribution and approved suppliers.

Minor NC: The red crates and blue dolavs used during the audit which were filled with meat were wet inside.

4.16 Dispatch and transport

Temperature during dispatch of the product is a CCP. Records were verified during the audit and during the audit also the verification process of the organisation is checked (verification of temperature is daily performed by the organisation) via CCP checklist F-BXT-NL-10045. All checked CCP's are checked at random to verify correct measurement and registration, twice a day by production leader or other approved verifier on F-BXT-NL-10048.
Transport is organised and scheduled by the Service desk. They are only making use of approved transport companies. Trucks are inspected for hygiene and temperature prior to loading. Results of these inspections are recorded on the CCP control forms F-BXT-NL-10045. There's a schedule for audits of the transport companies and a verification of the cleaning by agar samples.

Minor NC: a stair was standing on the foil in the truck during the filling of the truck and meat with possibility of dripping was transported above partly covered crates and over dolavs.

Details of non-applicable clauses with justification

Clause reference	Justification
4.3.5.	No high risk, products undergo full cooking prior to consumption
4.3.6.	No high care, products undergo full cooking prior to consumption
4.3.7	No ambient high care, products undergo full cooking prior to consumption
4.4.4	No high care or high risk area
4.4.13	No high risk, products undergo full cooking prior to consumption
4.5.3.	No use of non potable water
4.7.5.	No high risk or high care area
4.8.4.	No high risk, products undergo full cooking prior to consumption
4.8.5	No high risk / high care / ambient high care in place.

4.10.4	No magnets in place
4.10.5	No optical sorting equipment in place
4.10.6	No glass/brittle plastic containers used.

5. Product control

5.1 Product design/development

The product development process is centrally organised within the Vion Food. There are no product development activities at the Boxtel site. New processes are validated before implementation. Validation report of clipped meat for Korea assessed.

Shelf life / best before date trials are coordinated by the central QA department of Vion Food, with the exception of shelf life trials on customer demand. Data derived from these tests is, when applicable, adopted by Vion Food. Shelf life trial samples are taken in conformance of the central shelf life trial plan and seen during the audit.

5.2 Product labelling

Only 2 products are direct delivered as consumer products. Bulk products are delivered with product specifications based on customer requirements. For one customer with specific requirements an agreement was signed, it includes positive release and more than the standard analyses each batch.

5.3 Management of allergens

No allergens on site under current scope, only production and handling of fresh meat.

5.4 Product authenticity, claims and chain of custody

There is a procedure P-BXLNL-10219 Risk management third lands IKS and process/ product integrity dated 17-3-2016 which was reviewed 20-7-2017.
Vion Boxtel uses the GoodFarming* mark for designated meats, which are controlled and monitored throughout the chain (from breeding, livestock/pigs to slaughter). Products of this label carry a "GB" claim at dispatch. Most of the processed livestock has a good farming * origin, this is more than the actual sales of good farming * products.
Daily a mass balance of the good farming * meat is made and was assessed of 6/7-6-2017

5.5 Product packaging

The packaging and supplier approval is controlled at Vion Food central office. The central system is a part of the multi-site ISO 9001 approval. Primary packaging materials are appropriate for the intended use. Product packaging material is checked against visual standards of acceptability upon arrival at the site. There is a separated storage area for primary packaging materials.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Livestock/pigs are controlled by a veterinarian during the arrival at the slaughter department and during the process in the clean slaughter line (control for diseases intestinal check).

All analyses (hygienograms, microbiology, water, etc.) are subcontracted to an accredited laboratory operating in accordance with ISO 17025:
A microbiological monitoring program 'procedure planning monstername 2016-2017' and shelf life testing program 'Houdbaarheidsonderzoeken' (P-FOOD-10010 and P-NLFOOD-10165) are in place and were assessed.
The frequency of monitoring depends on the risk:
Carcasses own production: daily microbiological analysis of TPC, entero's, (pool) Salmonella (process hygiene);
Trimmings: daily microbiological analysis of TPC, entero's, (pool) Salmonella and listeria;
Deboned meat: 1 x / week microbiological analysis of TPC, entero's, Salmonella and Listeria;
Technical cuts, by-products and organs: 1 x / 2 weeks microbiological analysis of TPC, entero's, Salmonella and Listeria;
Besides above analysis specific tests on customer demand are executed and yearly tests on ochratoxin and heavy metals.

5.6.2 Laboratory testing

Results of TPC and pathogens (every thousand carcass) are analysed and reported monthly (KPI reporting). Trend graphs are applied. Results are analysed at trends at a monthly base (Q report). Tests are assessed for raw materials and finished goods. Microbiological results from "veredelde delen" from week 27-2016 till 23-2017 were assessed. Analyses performed on KVE, Entero's, Salmonella and Listeria. 6 times results were above internal limit. Corrective actions are taken when limits are exceeded (besides better performance a new decontamination oven was installed)

5.7 Product release

Products are released after the pre-shipment controls, which are carried out by the expedition department. The verification of CCP controls is part of the pre-shipment process. Verification procedure and checklists were assessed during the audit at dispatch and during the traceability test (F-BXT-NL-10048).

Details of non-applicable clauses with justification

Clause reference	Justification
5.3	No allergens on site

6. Process control

6.1 Control of operations

Process conditions and methods are well monitored and re-validated when deemed necessary. In case of breakdown of critical equipment (e.g. cooling system) a system and procedure is in place for the proper handling of product. Verification of process and equipment takes place once a year. The results are used and discussed as input in the yearly management review. QA monitors aspect of the controls that might affect food safety, legal and quality characteristics. The control of operations is partly at visual inspection during the process by operators and supervisors. Checks are made on the SSOP forms for process controls, such as temperatures.
The cooling system is automated and registered real time.

Maintenance of the cooling equipment has the highest priority. Real-time temperature-recording equipment is linked to an automatic alarm system. Alarms are set and maintenance department is notified of any alarm. The system is tested regularly.

6.2 Labelling and pack control

Packaging takes place in line with production planning and customer requirements. QC tests (product labelling, traceability code, shelf life, disclaimer, seal control) carried out in accordance with specifications. At the packing department, checks on labelling are carried out between batches, except for the organs heart and tongue on two lines. These products are checked on labelling also after pelletizing to ensure that correct labels are used.

Minor NC: Documented procedures for label control are not correctly executed:
Tare was incorrect labelled and the records of 12-6-2016 for label control were not signed according to procedure.

6.3 Quantity, weight, volume and number control

All products are sold by weight. Weighing scales are in place and subjected to calibration and maintenance programme. Calibration reports of the weighting scales and dated 7-4-2017 assessed.

6.4 Calibration and control of measuring and monitoring devices

Critical measuring equipment are thermometers (CCP related), weighing scales and metal detection equipment. These are calibrated. Records were available.
The equipment used to measure on CCP's is identified. List of measuring devices in place. Calibration due date on equipment. Seen calibration on temperature device equipment 503, 306, 108 and 112 dd 28-4-2017 with referential temperature device 15166723 calibrated by 2-3-2017. Metal detection device was calibrated 7-4-2017.

Details of non-applicable clauses with justification

Clause reference	Justification

7. Personnel

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

The HR department is responsible for archiving and monitoring training records. CCP trainings for CCP 1 to 8 was seen for several operators and workers (Training on CCP every 3 year, power point presentation by QA). Training was given in 2015 and daily verification execution of CCP was seen. The hygiene training/induction training with test was assessed during the audit. Last HACCP training was executed16-11-2016.

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

The standards for personal hygiene are documented in the QMS as P-FOOD-10017. The document is covering the requirements of the BRC 7 standard. The wearing of any jewellery isn't allowed.
Effectiveness of the hygiene procedures for personnel is part of the SSOP systematic.
A sample of each batch metal detectable plasters is demonstrable tested.

7.3 Medical screening

The medical screening is part of the intake of new employees and part of the instructions to visitors. Assessed for several workers, among which temporary workers. (Review every 5 year). 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. In case of a disease the company is consulting a specialised company doctor. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

7.4 Protective clothing: employees or visitors to production areas

Protective company clothing is facilitated to all staff, temporary workers and visitors and changed daily. Workers are divided per rank and agency by different colour hair nets. The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined (P-FOOD-10017). These hygiene rules are effectively enforced and daily inspected as a part of the SSOP control.

Protective clothes are provided in sufficient numbers. The laundering of protective clothing is outsourced to a contracted and specialised laundry . Gloves are cleaned by

The wearing of sleeves, aprons and work coats isn't allowed during eating and smoking. Disposable hair nets are in use; bear snoods are in use. Cleaning facilities are provided.

Details of non-applicable clauses with justification

Clause reference	Justification
7.4.4.	No high risk or high care area

Module 8 - Traded Goods

Scope	
8.1 Approval and performance monitoring of manufacturers/packers of traded food products	
8.2 Specifications	
8.3 Product inspection and laboratory testing	
8.4 Product legality	
8.5 Traceability	

Module 9: Management of Food Materials for Animal Feed

Scope

9.1 Management Commitment

9.2 HACCP

9.3 Outsourced Production

9.4 Specifications

9.5 Traceability

9.6 Chemical and Physical Product Contamination Control

9.7 Labelling
9.8 Training

Module 11: Meat supply chain assurance	
Scope	
11.1 Traceability	
11.2 Approval of meat supply chain	
11.3 Raw material receipt and inspection	

11.4 Management of cross-contamination between species
11.5 Product testing
11.6 Training

Module 12: AOECS Gluten-free Foods	
Scope	
12.1 Senior management	
12.2 Management of suppliers of raw materials and packaging	

12.3 Outsourced production
12.4 Specifications
12.5 Management of gluten cross-contamination
12.6 Management of incidents, product withdrawal and product recall
12.7 Labelling

12.8 Product inspection and laboratory testing

Module 15 FSMA Preventive Controls Preparedness Module				
Item no.	Clause	Module item	Conforms (Y/N)	Comments
1	117.20	Handwashing areas, dressing and locker rooms, and bathrooms must have adequate lighting.		
2	117.37	The water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.		
3	117.40	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact.		
4	117.80	Ice used in contact with food must be manufactured in accordance with the good manufacturing practice (GMP) requirements of 21 CFR § 117.		
5	117.110	Where defect action levels (DALs) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food		

		adulterated may not be reduced by mixing the food with another lot.		
6	117.130 (a)	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: • economic adulterants which affect food safety • environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • radiological hazards • unintentional adulterants that affect food safety.		
7	117.130 (b)	All identified, known, or reasonably foreseeable hazards must be evaluated to determine 'hazards that require a preventive control' (i.e., significant hazards).		
8	117.135	Establish one or more preventive control(s) for each identified 'hazard that require a preventive control' (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.		
9	117.139	Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following: • notifying consignees of how to return or dispose of recalled product • conducting effectiveness checks to verify recall is carried out • appropriate disposal of recalled product (i.e., destroy,		

		divert, repurpose).		
10	117.145	Establish monitoring activities and a written procedure for each preventive control in a manner consistent with the requirements of BRC section 2.10.		
11	117.150	Establish corrective action procedures when preventive controls are not implemented in a manner consistent with the requirements of BRC sections 2.11 and 3.7. Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).		
12	117.160	Validate all established process controls prior to implementation of the food safety plan, upon changes requiring revalidation or within 90 calendar days of the first food production. Validate allergen, sanitation and supply-chain controls as appropriate to the nature of the hazard, control and facility.		
13	117.165 (a)	The PCQI (or authorized designee) reviews the monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification. The PCQI (or their authorized designee) reviews the verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record has been created.		
14	117.165 (b)	Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing		

		procedure must identify the following: • sampling procedure to include method, quantity, frequency, and number of samples • analytical method • laboratory conducting an analysis • corrective action procedure where a pathogen is detected.		
15	117.165 (c)	Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • adequate number and location of sample sites • timing and frequency of sampling • analytical method • laboratory conducting the analysis • corrective action procedure where a pathogen is detected.		
16	117.165	Devices used to **verify** preventive controls must be calibrated.		
17	117.180	Identify a PCQI responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training or qualifications via job experience.		
18	117.305	All records required by 21 CFR § 117 must include: • the date and time of the activity being documented • signature/initials of individual performing the activity or conducting the record review • information to identify the facility (e.g., name and location) • the identity of the product and lot code where applicable.		

19	117.310	The owner, operator or agent in charge of the facility must sign and date the written food safety plan initially and again upon any changes following reanalysis.		
20	117.315	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours, with the exception of the food safety plan, which must remain onsite.		
21	117.405	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified **and** the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.		
22	117.420	Supplier approval must be documented **before** receiving and using raw materials and ingredients. Verification activities must be conducted **before** receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.		
23	117.430	One or more supplier verification activities (as defined in 21 CFR § 117.410(b)) must be conducted for each supplier **before** using raw materials and ingredients **and** periodically thereafter at an adequate frequency.		