Audit Report Global Standard Food Safety Issue 9

1. Audit Summary			
Company name	Vion Boxtel BV	Site code	1768974
Site name	Vion Boxtel BV		
Scope of audit	The slaughtering of pigs, the deboning, cutting to specification, slicing, packing in bulk, bag in box, consumer packaging of pork (fresh, vacuum packed, modified atmosphere, chilled). Production and packing in bulk of mechanically separated meat.		
Exclusions from scope	The intestinal washing process		
Justification for exclusion	Click or tap here to enter text.		
Audit start date	2023-04-11	Audit finish date	2023-04-14
Re-audit due date	2024-06-28	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	B+	Audit programme	Unannounced – mandatory 1 in 3 years
Previous audit grade	A		Previous audit date	2022-06-23	
Certificate issue date	Select a date		Certificate expiry date	Select a date	
Number of non-conformities			Fundamental	0	

2. Audit Results

	Critical	0
	Major	0
	Minor	13

3. Company Details

Site address	Boseind 10 5281 RM Boxtel		
Country	The Netherlands	Site telephone number	
Commercial representative name		Email	
Technical representative name		Email	

4. Company Profile

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

Shift pattern	2 shifts Monday/Friday and regular 1 shift at Saturday	
Seasonal site	No	
Seasonal opening times (Start/end date)	na	na
Other certificates held	ISO9001, IFS PIA, BLK, IKB, QS, SQMS, Tesco approved	
Outsourced processes	No	

4. Company Profile	
Outsourced process description	
Regions exported to	Europe Asia North America Oceania Africa Choose a region
Company registration number	EG61 NL
Major changes since last BRCGS audit	Routing/ area receiving pigs was renewed (also new electronic gate) and storage area for trucks to wait outside the sun and extra ventilated

Company Description

Vion Boxtel BV is the biggest processing plant of pigs to pork meat in the Netherlands. The company is part of the Vion Food group. The company is slaughtering abou pigs per day in 2 shifts. Main customers are industrial meat processing companies in Europe, Asia, USA and Australia. Snit ham 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 (Good farming *). The company has a approved system to comply with dedicated welfare demands. The company has about own employees and temporary workers (hired via contracted agencies). There's a 2-shift pattern. Most of the temporary workers are from East European countries such as Poland, Romania and Bulgaria. There are interpreters and job coaches in the company for communication purposes.

In 2020 the site was enlarged to integrate the processing of pork middles in the site in Boxtel. In Q1 2021 the processing of middles is started in Boxtel including a new system of packaging based at the use of – crates. The scope is changed in line with the current processes and products. In 2022 the reception area for pigs was renewed.

The company is certificated for ISO 9001 as part of a multi-site ISO system. Vion Boxtel is approved by authorities for export of pork meat to several third countries (e.g. Japan, Korea, Russia, Canada, Africa, China, Australia) The surface is sq. metres. The used quality system is based at HACCP-principles. The pork is deboned/portioned until the fifth cut, packed at semi-bulk level, partly vacuum or MAP packed. Also some vacuum-packed consumer goods for the Greek market are produced. EG number is NL61 EG.

SDP meat preparations was stopped last month, so product category 3 is out of this scope.

Website: www.Vionfoodgroup.com.

4. Company Profile

The site is audited against the requirements of BRC food 8; additional modules are not a part of the audit. Due to Covid 19 the use of plastic screens at the cutting lines, are still in use, at some area's mouth masks are still worn but no other measures.

The HQ processes are not audited separately for BRC and integrated in the audit of the site. The audit was performed unannounced on site

5. Product Characteristics

Product categories	01 - Raw red meat Category Category Category Category Category Category Category
Finished product safety rationale	Chilled red meat, short shelf life 5-8 days and chilled red meat vacuum / MAP 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 on for area
Allergens handled on site	None 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	Tenderloins, lean cuts of meat 80/20, Loins Japan, Bacon, neck without bones, half carcasses, bellies, shoulders 2D and 4D, neck China

6. Audit Duration Details			
Total audit duration	32 man hours	Duration of production facility inspection	16 man hours
Reasons for deviation from typical or expected audit duration	Processes with repetitive work		
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
	site manager	x		x	x
	QA manager	x	x	x	x
	Qa employee	x	x	x	x
	QA employees		x	x	
	Assistant maintenance manager	x		x	x
	Manager Planning	x		x	x
	Maintenance			x	x
Employees	Production cutting expedition slaughter stable reception pigs		x		
	Manager mager met		x		

	Foreman		x		
	Mager Met employee		x		
	Foreman		x		
	Manager non food storage		x		
	Manager Slaughtery		x		
	Foreman Slaughtery		x		
	Reception Pigs		x		
	Welfare employee stable		x		
	Manager deboning	x	x	x	x
	Manager		x		

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2022-06-23	BRCv8	Announced	Pass

Document control			
CB Report number	RQA9832737 - 4633262		
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	By the Head quarter of Vion, a Food Safety Culture procedure has been published (P - Food-NL-10017 14 Feb 2023). However this procedure does not include a concrete action plan for the site, indicating how and which activities will be undertaken within a defined timeframe (SMART). Also, behaviours required how to maintain and improve product safety processes are not included in the plan.	A plan has been developed and proposed to the general management of Vion. The proposal is to make performance part of the quarterly reporting. Based on the performance, we will deploy actions to ensure that the set goals are met. All this will be discussed at the planned QA managers meeting on May 30, after which the plan will be widely deployed across Vion. *Closed to be verified on site*	A plan has been developed and proposed. (See attachment 1, discussed and approved)	Vion had not yet prepared itself sufficiently for the new standard of the BRC. However, a procedure had been drawn up.	2023-05-18	
3.4.4	The SSOP's are part of the documented	The deviation has been discussed with the	Check during Hygiene rounds/ internal audits if	The department management were not all	2023-05-18	

Minor						
	inspection plan of the site additional to internal audits. The system of SSOP (digital system) was not fully effective: deviations of operations seen during the audit which were not demonstrably documented on this SSOP. And this way also the follow up was not clear e.g. corrective actions, timescale, implementation, and verification.	department management. The SSOP lists are checked daily to see whether all deviations that occur during production are also registered. *Closed to verified on site*	the SSOP lists are checked daily to see whether all deviations that occur during production are also registered.	aware of which deviations should or should not be mentioned on the SSOP lists.		
4.4.2	In the production area of DMM a crack was seen in the floor across the entire width	A repair request has been submitted in *Closed to be verified on site*	The employees involved have received a re-instruction. (See attachment 3)	The recently found crack in the floor which was caused by a construction error was not yet reported to the TD for repair.	2023-05-18	
4.6.2	The design of the suspension system at the ceiling of the crates transporting system, above line 4 in the middle deboning	In the weekend of week 18, an external party will come to look for a solution. The deposit/discoloration is fixed in such a way that no product	The employees have received a re-instruction on cleaning the system, , checked during pre-SSOP rounds. .	The contamination on the line appears to be a kind of deposit and discoloration of the ceiling. This is probably caused by insufficient	2023-05-18	

Minor						
	area, was found rusty. No direct food contacts.	contamination can take place. *Closed to be verified on site*		rinsing after cleaning with an acidic agent.		
4.9.1.1	Storage of chemicals managed by the cleaning company was not fully safe, acid containing chemicals were stored on the same drip tray as alkali containing chemicals. This is a recurrence of a Minor NC of past year, but now seen in storage managed by (external cleaning company) instead of own chemical storage.	The chemicals have been properly stored by *Fully closed*	The responsible employees of have received an re-instruction. In addition, a request has been made for a bigger storage container for the chemicals. (See attachment 4)	Due to the ordering of too large a stock, there was at the moment not enough space in the chemical containers.	2023-05-18	
4.10.1.2	The sensitivity of the metal detection was not listed for all metal detectors on site. Beside this, not fully clear was if during the validation of specific equipment all factors influencing the sensitivity were included and justified. (e.g. used	On Thursday, April 20, 2023, the supplier came by to calibrate the metal detectors. This showed that the metal detectors, except for 1 (see minor 4.10.3.4) were all correctly set. The sensitivity is stated in the validation reports of the metal detectors in question. The set	It has been explained to the employees involved where the information can be found and this is checked for. (See attachment 5)	During the audit we were not aware that the sensitivity of the metal detectors was stated in the validation reports from this supplier. We had not informed this (new) supplier that during calibration it must also be checked that all factors	2023-05-18	

Minor						
	test rods size, type of FP to test, volume/type of boxes.)	sensitivity of the metal detectors is the most achievable for the products in the current application. This is also recorded in the validation reports. *Closed to be verified on site*		that can influence the sensitivity of the metal detector are included and reported.		
4.10.3.4	During demonstration of testing the metal detection device (CP to protect cutting equipment), no rejection of test rod FE size 5mm was seen (Flex 2), no belt stops during this test. At that moment, the operator could not reproduce what actions to take in this situation. Later that day, pallets with B to B products were seen blocked. No shipment was loaded jet with this product.	The products and the metal detector were all blocked, not loaded. On Thursday, April 20, 2023, the supplier came by to calibrate the metal detectors. The accuracy of the metal detector has been adjusted. In the meantime, other line metal detector was used. *Closed to be verified on site*	The manager and the foremen have received a re-instruction how to handle, checked during SSOP rounds.	After the calibration, it turned out that the metal detector was not set accurately enough, so that it could happen that the metal detector did not stop. The manager and the foremen were too busy solving the problem with the metal detector that he unfortunately paid to little attention to the actions toward to products.	2023-05-18	

Minor						
4.11.3	Limits were set for rinsing water residues for the washing of crates and other crates. During the audit was seen that the pH was outside the acceptable limits of pH 7.5-8.2. No corrective action was defined on measured pH 8.6 and pH 8.8 which was recorded as “correct” on the SSOP (recording) list of 11 April 2023. Also during verification of documents related to the vertical trace test, same document and same type of deviation was seen: pH >8.2 was recorded which was found correct.	The employees have received a re-instruction. *Closed to be verified on site*	The employees have received a re-instruction. In addition, a work instruction will be written that will be hung next to the crate washer, checked during SSOP rounds.	The list was not completed correctly due to inattention on the part of the employee.	2023-05-18	
4.14.5	Some weeks ago, brown rats tracks were seen in the crawl space, extra traps were added	Our contact person at has been contacted directly and showed us how to find	The employees who use the portal have been instructed where this information can be found.	The portal contains the history of, among other things, the floor plans and visit reports.	2023-05-18	

Minor						
	including toxic baits. Not clear was how these extra traps were monitored and controlled. The plan was not adapted, it was not clear how many extra traps were placed and where exactly toxic baits were used. No direct production area entry from crawl space.	the right information, as it was there (See attachment 6) *Fully closed*	In case a new employee is involved, internal instructions will be given to show how the portal works and where to find the information	We were not aware were to find the old floor plans during the audit.		
4.15.3	Temperature control was manged by (maintenance). The setpoint of the of Expedition 2 was installed on 1 °C and alarm on >5°C. However, most of the day the temperature was >3 °C, around 4° up to 5°C. In this area also organs were temporary stored. This way the legal temperature must	Organs are no longer temporarily stored on Expedition 2. During the loading check, no deviations in the temperatures of the organs were found when measuring the temperatures. Therefore there is no risk that the products have been loaded >3°C. *Closed to be verified on site*	It has been agreed that, if no organs can be loaded on dock 58, the organs will be loaded from expedition 1, where they will be stored in the 0 degrees cell or from expedition 2, whereby the organs will be loaded directly into a refrigerated trailer set at 2°C and sealed with a folding partition wall.	Organs are normally directly loaded at dock 58. The trailer at this dock is set to 2 °C and sealed with a folding partition wall. Because it was not possible to load on dock 58, it was decided to load at expedition 2. However, it was not taken into account that the set temperature of expedition 2 was >3°C.	2023-05-18	

Minor						
	be <=3°C which could not be shown this was applied.					
4.15.6	The system to define the shelf life (validated) was not correctly applied (P-NL-Food-10165, v 09-02-2022). System: Basis (slaughter date+ 3= starting point) Shelf life is always production date + X days (depending on type of product). Production date is packing date / cutting to specification of hanged meat. During the on site audit seen re-packing of necks, production date 11 April 2023, Shelf-life production + 7d, (according to the rules) however, the product was slaughtered on 5th of April 2023. So the starting point for defining	The dry ice was added to the necks. Therefore those necks had a longer THT. These necks have been reprocessed after which they have been given a new destination with a new THT that corresponds to the original THT of the necks.	We have decided that with rework the original production date must always be maintained. The employees have received a re-instruction.	The necks were wrapped for a Greek customer. Because the order for this customer was canceled, the necks were deboned and repacked. We have not taken into account that the old production date must be maintained.	2023-05-18	

Minor						
	shelf life was slaughter +6 instead of slaughter +3 and not according the defined and validated shelf life					
4.16.1	During the onsite audit, CCP product temperature before dispatch was monitored and recorded (foods connected, digital system) not fully conform procedure (at start 2x, middle 1x and at the end of loading 2x): During loading truck at doc 2: all 5 samples were already recorded (electronic) and records of loading doc 7 (the container was almost full), no single sample temperature was recorded jet for this batch.	The products were removed from the trailers and then measured according to the procedure (1x at start, 3x in the middle, and 1x at the end of loading). Employees are instructed again. *Closed to verified on site*	The employees in question have received a reinstruction and have received an official warning for non-compliance with the procedure. The monitoring of the CCP's 2,3,4 and 5 is verified per CCP, per shift by another trained employee. In addition, we have created an extra checklist in .hat will be temporarily used several times a day to carry out extra random checks on compliance with the procedure. These extra checks will be	Because the department was busy, the employees did not follow the procedure.	2023-05-18	

Minor						
			carried out by the foremen and woman of the department who are all trained for the CCP 2,3,4 and 5 check. (See attachment 2) In addition, in week 17 temporarily a KPI was added to the huddle bord with regard to the CCP checks carried out, so that deviations are immediately discussed and preventive actions can be taken.			
7.1.7	Of the routinely review (implemented re-training of basis HACCP) some samples taken which were not performed on annual basis as defined in the company. Review method and frequency /re-training of activities relating to	An intake test is made in the Vion academy that must be completed annually by the employees. It is expected that we can start repeating the intake tests no later than 2023-07-31 *Closed to be verified on site*	When the new version of the system is going to be implemented, a module will be added that shows in 1 overview who needs which training, who has followed which training and when repetition is required.	Because our system currently does not contain a module to record training registration and repetitions, it was not always clear documented who, when and whether a repetition of a training had to take place.	2023-05-18	

Minor						
	control measures was not demonstrably defined.					

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

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

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

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

Audit team

Lead auditor		
Auditor number	**First name**	**Second name**
20287		

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
			LA	2023-04-11-2023-04-14	08.00	13.00	na	-

1. Senior management commitment

- Clearly defined **Food safety and quality policy** P-BXT-NL-10126 signed 2023-02-06 seen in which the intention of the site to produce and deliver safe, good, reliable and sustainable products is described; signed by the site managers 2023-02-06. Product safety, Food defence, Food Fraud, quality culture and continual improvement is also outlined in the company policy and part of internal audit program through in dept interviews during internal audits.
- **Product safety and quality culture plan:** The level of the 'culture' at the site is identified by introducing and implementing a plan for the development and continuing improvement of a food safety & quality culture (verified this plan). By the Head quarter of Vion, a Food Safety Culture procedure has been published (P -Food-NL-10017 14 Feb 2023).
  However this procedure does not include a concrete action plan for the site, indicating and measuring how and which activities will be undertaken within a defined timeframe (SMART).
  Minor NC on 1.1.2
- During the audit the implementation of this plan was also verified on the factory floor, local site plan was seen P Food 10059 2022-01-18 and all other departments that were audited. Seen was, that employees are stimulated in their behavior by team leaders and buddies. Clear individual and group values, attitudes competencies and patterns of behavior were visible also during the Tier meeting on the floor (and e.g. implemented whistle blowing system, training, implementation of 5S system, production startup meetings like VOS and Tier) which are included in the quarterly reviews.
- **Food safety and legality objectives:** Clear targets are set for production in through optimizing of the organization concerning food safety and growth. These are discussed in the management review and are applicable for the coming year. Results or significant trends that confirm how well the company was doing against the targets of last year are outlined in the MR (verified last MR 2023-04-07). Frequency of objectives monitoring in meetings is at a minimum 4 times a year And at least annually management review is set up. Verified quarterly meetings last one 2023-04-07.
- **Management Review:** The progress of realization of objectives are monitored via the Q-based Q-report. (seen report Q1-2023) and Q4 2022. Reviewed aspects in the Q-report are animal welfare, EKS, complaints, food safety, suppliers, training and food safety culture. Yearly management review process covering the period July – June. The management review report July 2021– June 2022 is seen which was confirmed and signed by the site manager and quality manager 2023-01-02. Seen minutes of this meeting. Corrective actions are clearly defined and added to the X-matrix of the current year. Q-reports and management review are demonstrably discussed during tier 1 meetings. In the quarterly Management review (verified last MR 2023-04-07) again all required items are discussed, and Food Safety objectives are set and monitored. Present during this management review meeting are site managers, production manager, maintenance manager, QA manager, planning department, finance manager, HR.
- **Regular meetings:** The company is working with the VOS systematic of communication, measuring results and management of improvement. VOS (Vion Operating System) is based at the lean management principles. The communication levels are described in P-BXT-10028 and is based at a cascading model, based at 2-4/day team huddles, daily tier 1 meeting and weekly tier 2 meetings. Objectives are documented in the X-matrix and are demonstrably linked to the vision and mission of the Vion group. There are non-negotiable objectives set for 2023: e.g. training (improve intake, yearly refresh training, HACCP training for leaders and managers, digital SSOP and PRE-SSOP, data integrity, cat. Material integrity and 14 more (quality) goals. Other objectives are related to the food safety culture (training) and product flow management at shop floor / WIP / Digital checklists. Also training goals were set on training executives (management on the floor) on Integrity, FS culture, IFS PIA and how to involve employees in this. Progress of the objectives is reported at a 4-weekly base during the tier 2 meeting.

- Verified overall meeting schedules. Several routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. Verified last HACCP/Food Safety (4 a year) meeting date: 2023-03-20. Last senior leadership management (TIER 2, 1 x week every Tuesday), last meeting date 2023-04-04.
- **Previous non-conformities:** All non-conformities have been closed out suitably (also of last audit), root causes for previous non-conformities were identified and preventive actions were implemented. RCA based on discussions within the QA team incl. involved employees/ managent but depending on the risk and impact of a deviation/non-conformance. Where necessary an improvement plan was be written. Seen overall action plan (Excell) which is updated after every meeting.
- **Organizational structure, responsibilities, and management authority:** The senior management has appointed qualified employees for key functions. Responsibilities and competences are laid down in job descriptions. Employees in key functions and the members of the Incident Management Team are announced in the production site. Also, Members of the Food Safety Team are announced. The organizational structure (P-BXT-NL-10028 2023-02-06 is up to date) reflects the current structure and reporting is up to date. The responsibilities for the management of activities are defined which ensure food safety, integrity, legality and quality and are clearly allocated and understood by the managers responsible, which was verified during the audit. Clearly documented was who deputies in the absence of the responsible persons. Job descriptions are reviewed, which were in line with the responsibilities.
  The job description of the shift leader and QA employee are verified; no remarks. Performance is reviewed by day-to-day management and yearly during the POP/PPP reviews
- Relevant documents of QMS are available via the network within the organization and embedded in the quality and food safety objectives. Site managers and QA manager are highly involved driving food safety and quality culture improvement based on VION VOS system. Performance management (white boards / TVs and daily performance meetings are implemented (Tier meetings)). In the chart all levels are defined for the departments. Site management team includes Food Safety Manager. The QA department responsible for food safety, legality and quality items is reporting within the management team meetings. Clear responsibilities/competences have been documented in QMS including arrangements in case of absence of the responsible staff. All staff are aware of their responsibilities and have access to relevant procedures. The site uses the knowledge and expertise of the Head Quarter VION Quality department with specialist supporting them.
- **Reporting food safety issues:** Food safety risks, concerns or non-conforming product issues are reported by staff and resolved. Seen e.g. reports of NVWA who is permanent based on site to monitor the slaughtering of pigs and other processes. The company keeps up to date with emerging issues, legislation, and good practice. Every employee can report issues when noticed. Fine reports of the NVWA are reported to LRQA on quarterly basis. No recall was needed since previous BRC audit.
- **Further remarks:** The logo is not used by the company. The logo is used on the website. Copy of BRC version 9 standard was available.

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

2. The Food Safety Plan – HACCP

- **HACCP Team:** The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical (including radiological risks) and physical risks for all steps in the production process, packaging material and general elements. The generic HACCP analyses of Vion is documented as P-FOOD-10000 2022-03-17. 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. In this way the site is informed and updated with legal, product & technology information. Additional assessments are performed for food defence (P-FOOD-10051) and food fraud (process integrity control plan P-NL-FOOD-10211). The local process control plan is documented as P-BXT-NL-100116/version 2022-5-6. The site has 8 CCP's and 40 control points (CP's).
- HACCP team members are demonstrably trained and have good knowledge (>10 years in the food industry.) of the QMS. Team leader is Q Manager. For this yare one of the goals is to perform a special HACCP training for leaders and managers, to increase awareness on food safety and culture knowledge. Changes in process and products are validated by the food safety team.
- The company has introduced a special HACCP training (also because of FSC improvements) for shifteaers/manager of shifts and departments. These were followed in 2022 and recently last trainig was given 2023-03-21 (seen for # ., # and #
- **Scope of HACCP:** HACCP system scope is laid down in P-PBX-NL- 10170 2022-04-07 and covers relevant processes and all products on site. Product is suitable for regular consumer groups. Different product groups are applicable (Procedure Products Boxtel P-BXT-NL-10.170 2022-04-07) and relevant information is described (product description/range, general food safety risks, packaging types, composition, ingredient groups, microbiological, chemical, radiological and physical properties that impact food safety, maximum safe shelf life under prescribed storage and usage conditions and also information on Food safety is included: the product groups:
  - Fresh pork meat (Dutch origin).
  - 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 The intended use does not exclude any consumers (no YOPI excluded).
- **Process flow diagrams:** Key process steps / operations to manufacture products within the scope of certification were verified for all processes during the audit and steps were shown. The several stages can be recognised: e.g. purchase/ receipt of pigs, control /check at the stable, slaughtering, chilling, debonig, postioning, packing, processing and storage and dispatch. There is an annual check of the flowchart by the HACCP team. This was last done on 2022-07-08. (general review). The flow diagrams verified reflect the different steps of the production process (seen flowcharts stroomschema's 2022-08-30 P BXP 10026). Note that flowcharts, as well as risk assessments and control plans are available for all different product type, leading to an extensive documentation.Last yearly verification was 2022-07-08. The flow diagrams accurately reflect the production processes.
- **Hazard analysis:** The HQ Vion organisation has made a general HACCP assessment, for the raw material incl. all process steps and has identified all PRP's and possible CCP's. In the local HACCP assessment, ththis is finetuned P-BXT-NL-100116/version 2022-5-6. The hazards and associated risks against the steps and raw materials icl. packing materials. In the system of risk assessment, a decision tree is taken in the document incl. method of risk analyses and list of literature (incuded in the geeral assessment P-FOOD-10000 2022-03-17). It is clearly described how to choose to come to PRP or CCP.

- **The company's food safety system** is based on the HACCP principles of the Codex Alimentarius, NVWA requirements, EU legislation, the legislation in the countries of sales and the customer requirements. Information used as base literature is taken in the system. The general principles are defined in P-FOOD-10000 2022-03-17. This document identifies all the PRPs and provides a description of the different hazards controlled by these PRP. A summary with all CCP's and CP (PRP's) listed in P- BXT-NL-10118 2022-04-07 These PRPs include:

- Cleaning and disinfection
- Pest management
- Maintenance and equipment
- Personnel and hygiene
- Training
- Supplier approval and purchasing (customer requirements)
- Transportation
- Cross-contamination as defilement of meat (incl.manure contamination risks) / fallen meat
- Water and air
- Cold chain
- Waste
- Traceability
- Integrity
- Product information

- This general document also includes a full overview of the hazards that have been analysed in the risk assessment. This includes microbiological (e.g. Salmonella, Listeria) chemical (e.g. PCB's), introduction of cleaning or greasing agents), physical (glass, wood, metal, …) and radiological risks. All these hazards are then assessed on likelihood of occurrence and severity, which leads to a classification and can lead to a CCP /PRP/CP (depending on answer on a supplementary question). This methodology is described in document P-FOOD-10000 2022-03-17.
- The company has defined 8 Critical Control Points (CCP's) (seen also overview P-BXT-10118 2022-04-07):

- Faecal contamination of carcasses (Zero tolerance for visible faecal contamination);
- Temperature control of animal by-products at dispatch <= 3ºC vacuum <=2 ºC;
- Temperature control of fresh / vacuum packed pork meat at dispatch <= 7ºC vacuum <=6 ºC, organs <2 ºC);
- Temperature control of partially chilled pork meat (6-hour transport) at dispatch, surface <= 7,0 ºC
- Temperature control of partially chilled pork meat (30 hours transport) at dispatch surface <= 7,0 ºC, temperature <= 15,0 ºC .
- Temperature control of fresh pork meat at reception <= 7ºC
- Temperature control of returned animal by-products at reception <= 3ºC;
- Temperature control of returned fresh pork meat at reception <= 7ºC.

- **Clear instructions** about control procedures, critical limits and corrective measurements are seen and validated. The quarterly HACCP review by the HACCP team is spoken with all managers and team leaders, in general good control was seen. Last reviews on documents (in general) were made following the changes to the BRC Standard. Changes in HACCP plans are also a point of attention when including new machinery. 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, corrective actions are addressed directly and corrections are demonstrably recorded and verified (all documented in a digital system)

CCP records are verified as part of the vertical traceability test, and during the audit on site, no deviations found.

- **Validation, verification and review:** There's a yearly verification of the HACCP system (as part of the MR , the report of the last reassessment (2022-07-08, discussed Jan 2023) reviewed period is 07 2021– 06-2022) is seen. The review of the food defence risk assessment is part of the reassessment process.
- **Documentation and record keeping is verified**. Results of verification/validation are recorded and communicated to the HACCP food safety team. The HACCP plan is reviewed and updated by the HACCP team whenever changes in the production or the related processes occur. The HACCP system is verified at least once a year by the Food Safety team. The HACCP- plan including all CCP's with critical limits has been verified during the management review. No special issues have been noticed by the team. Last time CCP's have been verified per CCP per shift verification recorded in the CCP monitoring list (', digital list) and last time PRPs have been verified (monthly), this was verified for Feb and March 2023.

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

3. Food safety and quality management system

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

- **Food safety and quality manual:**) is used as Quality Management System for the documentation related to the food safety and quality manual for all sites in the Netherlands and Germany. This is managed by the central Vion QA department. Each site has its own area within the system for local procedures and work instructions. All members of the local MT, team leaders and employees QA have access to .. Most working documents are also available in other languages. In general in Polish and English, but some instructions can be with department specific work instructions is available on the network and accessible using workstations available on-site. Documents are available up to 7 languages . *Also, on-the-job training is ava*ilable supporting working instructions and procedures as part of the management system. Documentation is up to date. Forma are availabel in most in Polish or Dutch.
- **Document control** (P-Vion 1007 202-1-11): documents seen during the audit were complying. Only QA manager and the consultant can make the changes into the system. Changes are collected in
- **Record completion and maintenance:** Records are in good condition and retrievable electronic/on site. Records retained for UBD plus 1 years as a minimum as common in the food industry. List of controlled documents is available and stored securely and is backed up (external kept).

3.4 Internal audits

Reference procedure: P-Vion-1001 2022-11-15 internal audits

The scope of the internal audit program covers the Food safety and quality management system (QOL), which is included all documents and procedure, related to BRC, own procedure, legislation and other schedules held like ISO9001, BLK, IFS PiA etc. The Food safety plan, Food Defence and Food Fraud plans, PRP plan and the Food Safety Culture plan are also included. All chapters of the system are audited with the related implementation in production. T

The internal audit plan 2022 is seen. Minimum 4 internal audits are scheduled throughout the year and covering the requirements of the BRC standard in basic. One of these audits is performed unannounced.

The frequency at which each activity is audited was established in relation to the risks associated with the activity as the reception of pigs (quality standards and healthy was audited min. 2 x year and all other activities also 2 x year. Internal audits are planned and performed by employees managed by HQ.

The auditors are internal, trained auditors, generally of HQ QA.

All internal audits are reported in a word format, indicating on the one hand the elements seen during the audit, thus identifying compliance and non-compliance including photos and additional information. Whenever actions are defined, they are taken in the action list whenever this is possible, and the action plan list whenever needed (follows the methodology of corrective actions).

The following internal audit reports were checked during the audit:

- 2022-12-08 announced, covering all activities
- 2022-06-17 unannounced, covering all activities
- 2023-02-01 traceability audit
- 2023-04 USDA audit

Of the internal audits sampled in the excel file, actions are addressed and follow up was demonstrable (see also section 3.7).

Extra verification was also included in the next audit by the auditor.

Apart from this systematics, there is a programme of internal inspections. In addition to the internal audits, hygiene and fabrication inspections are kept at a daily base (pre-SSOP and SSOP checks) and include pre start up inspections (after cleaning, daily inspections during processing of hygiene, environment as doors, wall, facilities, status of the building and equipment, glass breakage detection and maintenance activities. On top of that, the QA department is verifying the SSOP results during the Agar sampling and EKS checks.

The SSOP's are part of the documented inspection plan of the site additional to internal audits. The system of SSOP (digital system) was not fully effective: deviations of operations seen during the audit which were not demonstrably documented on this SSOP. And this way also the follow up was not clear e.g. corrective actions, timescale, implementation, and verification. ***Minor NC on 3.4.4***

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The management of suppliers is a corporate/HQ responsibility within the Vion Group.

Vion Farming is taken care for the suppliers of livestock (pigs and cattle) from the farms.
Process is documented in P-NL-Food 10157 and verified for pork. Integrity / canalisation is verified also by IFS PIA and during the assessment on site 2023-04-13 on types of QS/ GF/ Welfare / IKB:

- UBN IKB approved.
- UBN IKB approved.
- UBN IKB approved.
- UBN IKB approved.
- UBN IKB approved.

GB canalisation is based at IKB certification.

Purchasing processes of raw materials (ingredients) and packaging materials are managed by the HQ via approval procedures (incl. GFSI / chain certification status and questionnaires) and contracts. 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. Site Vion Boxtel BV has no external suppliers of pork meat, except the middles from the Vion site in Apeldoorn (also BRC certificated). There's a yearly assessment of suppliers; each Vion site is asked for input. No serious high-risk suppliers are identified. Overview is seen in : input from Vion Boxtel about approved suppliers of packaging

materials and services. Suppliers of primary packing material must be BRC IOP or IFS pack certified. Services including cold storages Seen supplier evaluation of cold store Grolleman performed by a supplier audit on 2022-06-28 by Vion HQ auditor. Product integrity is also a subject within this audit conform procedure on product integrity, P-Food 10049 2022-03-21. Supplier assessment is a continuous ongoing process. All suppliers are evaluated yearly, parameters are e.g. certification status and quality of deliveries (e.g. illnesses).

From all agents the original producers are known and approval and certification for these producers is present. Suppliers, if not audited or certificated, will be traceability tested on first approval and then at least every three years. But no such suppliers were seen.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Livestock deliveries are checked at their requirements by an administrative check of the delivery documents before slaughtering conform delivery procedure P- BXT-NL- 10022 2023-03-06. A veterinarian check at animal welfare and health aspects is carried out by the local veterinarian (employed by the Dutch government / NVWA). Suppliers are certified but are also audited random by Vion Farming themselves. Vion Boxtel BV is also processing pork middles, delivered by the Vion plants intercompany. The temperature of incoming meat is controlled as CCP6.

Ingredients and packaging materials are received at the dry central warehouse of Vion, also located in Boxtel at the Korenmolen 10, but management by the HQ and included in the inspection rounds.

Seen supplier # and # delivering foil as primary packaging, IOP, BRC Packaging certified (vertical trace test), verification was seen in , 2023-01. On location Boxtel, there is an internal warehouse managing the packing materials on site. They keep enough packing material on stock, order at The Korenmolen 10 when running out of stock, and manage the start / end date of usage of certain batches (traceability). The departments order on their turn packing material at this internal warehouse. Good control was seen also during the vertical trace test.

3.5.3 Management of suppliers of services

Reference procedure: P-Food_10000 2023-01-23 Management of suppliers of services

The approval was shown for all contracted services. Service suppliers (based on risk assessment) are evaluated yearly together with raw materials the evaluation)

Monitoring was shown for contracted services, formal agreements (including food safety and food defence aspects) and training was verified for:

- Pest control ( )
- Laundry services ( )
- Offsite storage (,
- Contracted cleaning (,
- Catering services (,
- Contracted cleaning (
- Transport (Distryfresh)

.

3.5.4 Management of Outsourced processing

No outsourced processes under scope.

3.6 Specifications

Specifications are managed by the HQ department master data management (about 13.000 articles / specifications YTD).
This is all manages by HQ department specialised in cutting type. Every (little deviation or client specific request is adjusted (new article) and completed on a “client cart” (basis product- cutting type – packing type)
The following specifications are sampled and verified during the audit.

- Hampunten
- Mager Met 70/30
- Blue LDPE bag
- Frozen pork
- Schoulder 2D
- Foil (vacuum) #
- Blue LDPE bag
- Foil Opi
- Voorstukken front pieces

Specifications were available in an up-to-date version. Review of specifications is at least 1 x / 3 years. Also verified during vertical trace test.
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 vertical trace test.

3.7 Corrective and preventive actions

Process of corrective and preventive actions is related to VOS for the operational processes. Corrective actions related to complaints are communicated via the tier 1 structure. Seen P-NL-Food-10171 2008-06-30. Corrective actions related to pest control, pre SSOP, SSOP are recorded and demonstrable. In case of unfavorable trends an A3 improvement process is starting to investigate the root cause and identify measurements to improve. Used methods for improvement is based at go-look-see approach. Most of the start-up issues of Fase 2 Boxtel are solved, although there are still action points related to the project as input to finish the validation. Corrective actions on sampled Internal audits were also checked for, good follow up and corrective /preventive actions were demonstrably taken. Some open actions were seen, but no overdue deadlines.

Managing corrective actions, defining root cause and actions for follow up and effectivity check is described /managed by several procedures and methods of follow up. But in general, the VOS system and tier structure of meetings is leading and effective method managing corrective actions

3.8 Control of non-conforming product

Reference procedure: P-BXT-NL10131 2015-11-23. (blocking procedure)
Clear procedures for control of non-conforming products (e.g. fallen meat, blockades) are in place: Products on hold are physically identified as such (red label/tape). Process is seen in practise during the site audit for fallen meat in the cutting area; no deviations seen. The procedure for non-conforming product defines how non-conforming product is identified, quarantined and disposed of.
Returmned goods are managed by P-Food-100181 2021-11-02. Only authorised personnel (QA Manager or department manager) are allowed to release products

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

Manual hold by labelling pallets of recipients with label covering the required information. Release of products on hold by production manager or QA-staff. Segregated section in the final product warehouse for non-conforming products, returned goods. Corrective and preventive actions system is up to date. The handling of non-conforming products is according to requirements. No blocked products seen during audit round.

3.9 Traceability

Reference procedure: P-BXT-10141 2023-01-03 Traceability canalisation, traceability on packaging P-BXT-10125 2023-01-06 and P-BXT-10141 2023-01-03 (recall/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 2022-02-23). Procedure includes the required documents to complete the traceability and the mass ballance. The traceability is according requirements country of sales e.g. China, USA, tested during the specific annaualy China/ USA audits..his system is fully based on written documents, batch codes and bar codes, managed by Innova.

- Porks bear an earmark (+ accompanied by track record and VKI)
- Information earmark is linked to the chip in the slaughter hook and recorded in
- 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 (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)

Traceability tests including mass balance are kept, min 2 times a year, but in general performed more often as this is most of the time also a requirement during client audits. Reports sampled of these traceability tests were seen tracetest 2022-11-16 incl bottom up trace UBN . slaughter 2022-10-222 and recall test (incl traceability test) 2022-05-27. On 2022-10-04 a test was donne outside normal working hours to test the "phone number list", the assesibility of employees involved in case of a recall or withdrawal situation. This test was succesfull.

During the audit a vertical test is kept for the order no , of tenderloin vacuum packed frozen in bozes . kg (pallets in total) pieces packed in cart on boxes. The product is transported by to the client. The company was showing a sustainable system of tracking and tracing of product and corresponding documentation from expedition (dispatch) back to the slaughter proces and reception of pigs on 2023-01-11 and upstream from received UBN/pig number to finished products.

Documents showed during the test: End product specification, specification spices and packaging material, 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 checks, PRE

SSOP, Verification list CCPs, Monitoring list CCPs, Pre-shipment control list, knife control checks. Trace for/backwards. The production process has no rework flows.

The test was successful performed within 4 hours including competed mass balance and traceability of the primary packing materials.

3.10 Complaint-handling

Reference procedure: P-BXT-NL-10096 2021-012-27 Complaint handling Boxtel

Complaints are received by the sales organisation and send to the complaint inbox email address of Vion Boxtel. Complaint handling is performed at a daily base within the prescribed timelines. Process is verified for complaint : 2023-04-03 and 2023-03-23, the complaint handling is demonstrable. Organised process with in-depth analyses for food safety complaints and link to the VOS system. There's a weekly complaint analysis report for the MT, which is discussed in the tier 1 meetings. The trend is slightly upwards for complaints in 2022. YTD 2023) complaints received of whic on FS related items and on integrity situations. No serious quality / Food safety complaints were recorded.

3.11 Management of incidents, product withdrawal and product recall

Reference procedure: P-VION-10015 2023-04-11 **Management of incidents, product withdrawal and product recall.**
There is a Vion overall crisis and recall management procedure managing incidents and potential emergency situations that impact food safety, authenticity, legality or quality issues and is applicable for recalls and withdrawals. Information on informing certification body was included. This procedure covers the process which is applicable for all Vion sites and is managed by HQ, Vion. 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 2023-02-06 defines the composition of the recall team and complies with these requirements. The recall procedure is tested 1x / year. Last mock recall was 2022-05-27; report is verified; no remarks. No recalls since last BRC audit.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
3.5.1.5	No purchasing through Agents or Brokers

4. Site standards

4.1 External standards

Suitable located building containing enough space. No adverse activities in the surrounding area. Site is suitable maintained and well equipped; makes a logical and safe way of processing possible.

4.2 Site security and food defence

24h/7 site 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 at all potential entry points to the plant. Reassessment Food defence executed 2020-10-20 including verification of the food defence plan. Actual site diagrams are seen. Recently a new gate at transport site of supply of pigs was installed which open and closing system is working very fast. This is an improving step on food defence on even more reduction of possible entry of unannounced guests which is minimised.

Seen the Vion Good Business practice guide incl. cyber security which is communicated with all employees. No specific legal requirement applicable. Employees are trained, Food defence is included in the entry training for all employees started working at the company.

Food defence plan (TACCP) P-Food-1005 2023-02-22, latest verification as result of evaluation which was part of MR 2023-01-02. The Food Defence plan is suitable for the site. The outcome of this TACCP is that all risks identified are mitigated.

4.3 Layout, product flow and segregation

The slaughtering, 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.
Actual site map dated 2022-12-06 is seen, risk zones are included and contains the flows in conformity with 4.3.1.

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. The cutting and deboning site is a modern building fabric, well maintained. Good facilities. No elevated walkways. Access steps or mezzanine floors that are adjacent or above open product were well covered and protected. Walls, ceilings and floors were suitable in general. Drainage system and ventilation are according to requirements. Well maintained ceilings/constructions with a good access to suspended ceilings, which are full closed. Protected glass, no windows could be opened in the processing areas.
Floors are coated or granite and in good condition. Continuous attention is given to the condition of the floors, however a minor NC on 4.4.2 as in the production area of DMM a crack was seen in the floor across the entire width.
There's a technical area above the new production area of the middles and packaging area for technical parts like the ventilation system.

In case of glass windows, these are protected by foil. Suitable ventilation and cooling throughout the factory. Daily check of the condition by the SSOP checks and in depth by the quarterly inspection of fabrication and hygiene aspects.

4.5 Utilities – water, ice, air and other gases

The water used for cleaning and process purposes is water from the main supply. Hand-washing water or for equipment or plant cleaning is supplied in sufficient quantity, is potable at point of use and poses no risk of contamination according to applicable legislation. The distribution system was seen in an up-to-date schematic diagram of the distribution system on site. Testing of water (chemical/microbiological) is part of the microbiological monitoring plan P-BXT-NL-10009 (2021-01-14 and P-NL-Food-10.196C. The samples are analysed by , which is an ISO 17025 accredited laboratory). Water quality is defined as a CP. Sampling frequency is 4 times a year, seen results 2023-03-17, TPC was too high, re sampling was done on 2023-03-23, ok. Other results were within the standard. Also seen report water quality Q1 : all results were within the standard.
Dry ice is used for cooling purposes, CO2 gas is used for packaging purposes. Used gas and ice is food approved. Compressed air is filtered, and system is suitable maintained, but not directly in contact with products. Steam boilers maintained by . Ventilation system with use of Airsocks, manged well. Regular cleaning (changing and washing) of air socks was implemented.

4.6 Equipment

Equipment installed is suitable and designed for the intended purpose. Equipment is specified, tested and commissioned before commercial use. Equipment which is in direct contact with food is suitable for food contact and meets legal requirements where applicable. Equipment made of stainless steel. Used stainless steel is RVS304. Belts are food grade. There is a procedure for moving static equipment detailing preventing potential risks to food safety and equipment integrity (MOC). Equipment that is not in use is always taken into the cleaning schedule. Mobile equipment and battery-charging equipment is in use, potential risk to the product is prevented by means of separate storage and up to date maintenance. New equipment is purchased as required and specified. DOC was seen of belts. MOC process is also used for the validation of new equipment; report seen for the fase 2 process (F-BXT-10120, dated 2021-05-06. Equipment that is not in use was seen stored clean in the production area or in a separate area. However the design of the suspension system at the ceiling of the -crates transporting system, above line 4 in the middle deboning area, was found rusty. No direct food contacts. ***Minor NC on 4.6.2***

4.7 Maintenance

The process equipment and main process steps are monitored by the maintenance department via a system in combination with camera surveillance at critical technical points of the installation. Systems are generating SMS messages to mechanics in case of failures and deviations. In 2022 the maintenance planning system is changed into and all machines are incorporated in the system. Process is verified for the air treatment equipment (last maintenance in 2023-02-02) and Chilling system is controlled and checked regular as this is outsourced, company # is very regular on site to monitor and maintain the systems, verification continuous by the system supported by setpoints and alarm system. There's a continuous dialog system with the external company about the performance of their equipment (contract 2020-10-28). 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.

All used lubricants are food grade with an FDA H1 status (food grade), verified for Food lubricant; MSDS sheet were seen, and lubricant is food approved. Automatic lubricant system in use for the main process like transport chains.

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 located in a separated building from the production.

4.8 Staff facilities

Canteen and changing rooms (production and dirty slaughterhouse) were assessed. Facilities are designed to a good level and extended in 2021 since the site has new employees. Cleaning and maintenance are 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 sole washing and hand disinfecting equipment is installed including a tourniquet.

Rest room and catering facilities are provided for staff. A HACCP plan is applicable. Smoking is only allowed in a segregated area at the outside area of the site. Proper storage areas and fridges were observed for brought food stuffs.

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

4.9.1 Chemical control

Chemicals/cleaning agents are not always stored separately and away from production. Storage of chemicals managed by the cleaning company was not fully safe, acid containing chemicals were stored on the same drip tray as alkali containing chemicals. This is a recurrence of a Minor NC of past year, but now seen in storage managed by (external cleaning company) instead of own chemical storage. ***Minor NC on 4.9.1.1***.
Authorised access by cleaning company and production department. MSDS available and specifications confirm suitability for use in food processing industries. This is verified for . MSDS documents and specs are seen, and the used dosages are in conformity with the prescribed dosages. Employees handling cleaning chemicals are demonstrably trained which was checked for facility employee #

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. Good notification and control were seen. Staples, paper clips and drawing pins are not used in open production areas

4.9.3 Glass, brittle plastic, ceramics and similar materials
Reference procedure: F-BXI-NL-10057 2021-08-30 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. F-BXI-NL-10057 2023-02-07 Glass / hard plastic audits are regularly carried out by production department (daily pre-SSOP and SSOP). Besides daily check, 1 x / 3 months audits are executed by the verification of the glass register by the QA department, which is documented as a map of the specific department. Verified for the most recent glass audit at 2023-02-02 (dep. Slaughter). Follow up of action points is demonstrable.
4.9.4 Products packed into glass or other brittle containers
Products are not packed into glass/brittle containers.
4.9.5 Wood
Wood is not allowed (and not present) near open product areas.
4.9.6 Other physical contaminants
Handling according to procedure. No specific issues seen – there is a protection of the equipment for packaging falling into the product. Blue metal detectable pens and plasters are used, and paperclips / staples are not allowed (verified during audit on production floor).
4.10 Foreign-body detection and removal equipment
4.10.1 Selection and operation of foreign-body detection and removal equipment
The HACCP study determined the metal detection step as a CP, not a CCP (Only B to B products), the sensitivity of the control measures are appropriate, however the sensitivity of the metal detection was not listed for all metal detectors on site. Beside this, not fully clear was if during the validation of specific equipment all factors influencing the sensitivity were included and justified. (e.g. in combination with used test rods size, type of FP to test, volume size of boxes and type of product to detect (density).) ***Minor NC on 4.10.1.2***. Metal detection on technical meat parts (B to B products) is more often performed to protect equipment. Checks are performed every hour. Employees for monitoring are trained by an instruction. Good attention was seen on usage of (blue) plastic used as covers or packing material) inner liners to avoid contamination as plastic is listed in the top 3 of complaints. Extra control steps are introduced to detect little bones (manual inspection).
4.10.2 Filters and sieves
No filters and / or sieves
4.10.3 Metal detectors and X-ray equipment
Detection equipment installed as result of the risk analysis and are controlled as CCP. CCP which is determined, including critical limits, all checked beginning/end of the day, every 2 hours and between breaks.

Metal detection; test bar with bullets:

Flex fresh: Fe 5.0 mm - non-Fe 6.0 mm - SS 7.0 mm

Bacon / shoulders: Fe 4.0 mm - non Fe 5.0 mm - SS 8.0 mm

Vacuum: Fe 3.5 mm – non Fe 40 mm - SS 6.0 mm

Corrective actions are clearly defined according to the CCP overview. Data of the metal detectors is available in the documentation. E.g. the sensibility of most of the detectors is clear. Automatic rejecting device/belt stop/alarm or alarm sound is heard, all depending on type of the metal detection.

Most metal detection is used for B-to-B product to protect equipment during further processing of the meat.

The CCP was demonstrated, including a right way of recording during the audit during several processes. These were performed all well beside one test on the packed shoulders/ bacon:

During demonstration of testing the metal detection device (CP to protect cutting equipment), no rejection of test rod FE size 5mm was seen (Flex 2), no belt stops during this test. ***Minor NC on 4.10.3.4***

At that moment, the operator could not reproduce what actions to take in this situation. Later that day, pallets with B-to-B products were seen blocked. No shipment was loaded jet with this product.

During vertical test metal detection was checked including check on maintenance and calibration, ok.

4.10.4 Magnets

No magnets are used into the process

4.10.5 Optical sorting equipment

No optical sorting equipment is in use.

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

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

4.10.7 Other foreign-body detection and removal equipment

No other foreign-body detection and removal equipment

4.11 Housekeeping and hygiene

Cleaning mainly by external company and own staff following schedules with frequencies and applied agents and procedures and cleaning schedules. Cleaning is done as common in the branch: dry cleaning, flushing, foaming, (this includes disinfection), flushing. This is done on a daily base. Seen records of cleaning during the audit (pRE-SSOP) 2023-04-11 until 2023-04-14, and of the trace test for all areas form reception of pigs until dispatch (expedition). Daily start-up checks with visual inspections are carried out. In general, good results of cleaning could be noticed in practice. Hygiene scores monitored and subject to company quality objectives. Good and directly follow was seen on incidental not well cleaned objects, re-checks and verification were documented.

However limits were set for rinsing water residues for the washing of -crates and other crates. During the audit on day one was seen that the pH (residue test) was outside the acceptable limits of pH 7.5-8.2.

No corrective action was defined on measured pH 8.6 and pH 8.8 which was recorded as “correct” on the SSOP (recording) list of 11 April 2023. Also during verification of documents related to the vertical trace test, same document and same type of deviation was seen pH >8.2 was recorded which was found correct. ***Minor NC on 4.11.3***

This cleaning process is monitored by cleaning verification see 4.11.8

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. Temperature is monitored ir ; CIP process blood vessels is verified with agar sampling. Results 2022 – 2023 are seen and are all good.

4.11.8 Environmental monitoring

A risk based environmental monitoring program is in place, typical sampling areas, organisms being assessed, frequency of testing, procedures for out of specification results are identified and verified. This cleaning process is monitored by agar control, verified agar results 2022-2023 YTD: weekly sampling of parts of the processing areas. In general every department is sampled 1 x 8 weeks. (example seen of “mager met processing” wk. 4 2023, results not ok, (cleaning company) was demonstrably informed, re-sampling was ok.)

Environmental monitoring is based on Listeria swabs, 5 swaps are random taken /month. Results of 2022/2023 YTD are verified, in general good results. There were a few positive results linked to cleaning of drains. Corrective actions are taken and effective, based at the results of the resampling.in 2022 1x positive sample, in 2023 positive sample 2023-03-11, resampling 2023-03-24 was negative, ok

4.12 Waste and waste disposal

The site has several types of waste materials. The removal of waste is done by contracted and only licensed waste removal companies.
Cat 2/3 is removed by (in between stored separate and chilled). Seen in review check on approval 2022-07-08. Other types of waste are paper, carton, plastic, metal, wood, chemicals and residual waste. Company is contracted for the removal of these types of wastes
Waste is identified, collected, and removed from the production areas regularly.

Waste is stored in marked containers in the production and on the premises before it is being disposed of. No accumulation of waste seen during site tour.

Wastewater is disposed in the municipal sewage canal. Wastewater treatment is managed by an external company next to the site. Company has a clear policy to minimize the amount of waste.

4.13 Management of surplus food and products for animal feed

No surplus food or products for animal feed.

4.14 Pest management

Pest control is outsourced to a contracted pest control agency . Contract management by Vion HQ. Contract is covering the pest control of rodents, insects and mots. Control frequency was set risk based and performed 8x/year and a yearly in-depth inspection. Competences of pest control inspector is verified (EVM recognised until 2027-5-18). Pest control is part of the regular HACCP training for employees, to understand the signs of pest's activity and increase awareness. In case of detection, manager needs to be informed.
Report of the last inspections at 2023-04-4 (extra visits because of possible rat in crawl space) because of possible brown rat detection: spores were seen during visit 2023-02-08 rat detection, 16 extra detection points are added including toxic baits (not in processing/production area), no infestation situations reported. Seen specification of toxic bait incl. license to use

Minor NC on 4.14.5 As some weeks ago, brown rats' tracks were seen in the crawl space, extra traps were added. Not clear was how these extra traps were monitored and controlled. The plan was not adapted, it was not clear how many extra traps were placed and where exactly toxic baits were used. No direct production area entry from crawl space.

4.15 Storage facilities

Good storage of packaging, ingredient and product are seen. The storage facilities are suitable in relation to the operation. Warehouses are clean, dry, well-ventilated spaces protected from dust, condensation, fumes, odors or other sources of contamination. Waste materials and chemicals (cleaning products, lubricants, and pesticides) are stored separately. Good warehouse practice audits are performed.
As the company is producing fresh pork meat, carcasses are stored 1-3 days before they are cut to specification. Storage temperatures are controlled automatically via the . Used temperature standards are in conformity with the legislative demands about temperature. Is verified for the temperature in storage areas e.g., carcass storage at the 2023-04-14: seen temperature is below the Vion standard and legal standards. Seen real life during audit in the maintenance department and seen print screens of the trace test.
However, the setpoint of the of Expedition 2 was installed on 1 °C and alarm on >5°C. However, most of the day the temperature was >3 °C, around 4° up to 5°C. In this area also organs were temporary stored. This way the legal temperature must be <=3°C which could not be shown this was applied. ***Minor Nc on 4.15.3***
There is no outside storage. Stock rotation is controlled, most products are packed based on orders. Production and expedition processes are organized based at the FIFO principle, although the stock rotation of necks was not performed fully correct in relation to the defined shelf life, see ***minor NC on 4.15.6:*** The system to define the shelf life (validated) was not correctly applied (P-NL-Food-10165, v 09-02-2022). System:
Basis (slaughter date+ 3= starting point) Shelf life is always production date + X days (depending on type of product). Production date is packing date / cutting to specification of hanged meat.
During the onsite audit seen re-packing of necks, production date 11 April 2023, Shelf-life production + 7d, (according to the rules) however, the product was slaughtered on 5th of April 2023. So, the starting point for defining shelf life was slaughter +6 instead of slaughter +3 and not according the defined and validated shelf life

Part of the production output is distributed to contracted frozen storage locations (GFSI certified), contract is managed by HQ. Supplier audit was performed 2022-06-28, ok

4.16 Dispatch and transport

Temperature during dispatch of the product is a CCP. Records of the CCP check and the pre-shipment process were verified during the audit and as a part of the vertical test. Transport is organized and scheduled by the Service desk. They are only scheduling 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, see chapter 5.4.

During the onsite audit, CCP product temperature before dispatch was monitored and recorded (foods connected, digital system) not fully conform procedure (at start 2x, middle 1x and at the end of loading 2x): During loading truck at doc 2: all 5 samples were already recorded (electronic) and records of loading doc 7 (the container was almost full), no single sample temperature was recorded jet for this batch. ***Minor Nc on 4.16.1***

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.4.6	No elevated walkways, access steps or mezzanine floors that are adjacent to or pass over production lines
4.9.1.2	No use of strongly scented or taint forming materials.
4.9.2.2	No uses staples, clips and drawing pins
4.9.4	No product packed in glass of brittle containers.
4.10.1	No foreign body detection equipment present.
4.10.2	No sieves or filters in use
4.10.3	No X-ray in use
4.10.4	No magnets applied.
4.10.5	No optical sorting equipment installed.
4.10.6	No packing in glass jars or other rigid containers.

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 (changes are mostly changes in snit and B to B). New processes are validated before implementation. The MOC procedure is used for the validation of the new middles processing department / fase 2; report 2021-06-05 is seen.
Shelf life / best before date trials are coordinated by the central QA department of Vion Food, except for shelf-life trials on customer demand. Shelf-life trial samples are taken in conformance of the central shelf life trial plan and seen during the audit, for different temperatures and shelf life (stored at 0-2 and 4 degrees). The current used shelf-life terms are in line with the shelf-life test results

5.2 Product labelling

Labelling is according to legal aspects as required by the company; several checks done during production tour. Bulk products are delivered with product specifications based on customer requirements and legislation aspects. Labelling text is based at product description B-to-B, production date, shelf life term, country of origin and storage conditions. The Innova system is the ‘’cloud’’, all used label printers are linked to .

5.3 Management of allergens

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

The risk of allergens via employees / food stuff is part of the risk assessment. This is controlled with the following measurements: it’s not allowed to wear the work coat in the canteen and all employees need to wash and disinfect their hands before they are entering the production facilities and the wearing of gloves.

Allergen management is part of the refresher training for employees and introduction training for new starters.

No claims were made e.g. “free of”.

5.4 Product authenticity, claims and chain of custody

A food fraud assessment is done managed by HQ, using the criteria probability of occurence vs probability of non-detection. This covers all mandatory requirements of BRC. The vulnerability assessment is documented as Process integrity control plan/assessment P-NL-FOOD-10049, reviewed at 2022-03-21.
As result, no suppliers / raw materials were seen with high risk which need a mitigation plan.
Aspects like replacements and substitution are part of the vulnerability assessment. The company is certificated for IFS PIA. A daily mass balance is one of the requirements of the scheme. This is verified during the traceability test (vertical test). The mass balance was within limits and is caused by a typical aspect in slaughterhouses: pigs staying overnight in the stable.
Seen third country protocol on integrity 22022-06-03 and procedure on reception of pigs BXP-NL-10622 2023-04-07.
Organisation is certified for: QS, IKB, Better life 1*, SQMS, and IFS PIA Seen VACCP

5.5 Product packaging

The packaging and supplier approval are managed by the central purchase department at Vion Food HQ. There's a list of approved suppliers of primary packaging materials. Primary packaging materials are appropriate for the intended use. This is verified for the Blue LDPE bag, used for the packaging of SDP and all relevant documents (specification, food grade statement, migration tests) were available. 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, on-site product testing and laboratory analysis

Reference procedure: P-BXT-NL-10009 2021-01-14 **Product sampling**

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, pathogens, blood samples, shelf-life water, etc.) are subcontracted to an accredited laboratory operating in accordance with ISO 17025:). A microbiological monitoring program 'procedure planning monster name 2023 P-BXT-NL-10009 and shelf life testing program 'Houdbaarheidsonderzoeken' (P-FOOD-10010 and P-NLFOOD-10165) are in place and were assessed.

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). Results of the monitoring programme are part of the quarterly based review of the food safety and quality system. Results are verified: stable trend for PCA, Salmonella has some positive results, no need for further action, because of the full cooking step in the chain (VO 2072:2005); no listeria in products found.

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.

Sampling process is verified for:
- Bovenbil vacuum 2022-09-14 and neck incl. bone 2022-10-13, belly with bone 2023-03-03, bovenbil fresh 2022-12-21 2022-01-20 loins.
- Pathogens carcasses wk. 28-46, some re-samples were needed on carcasses, from wk. 46 2022-YTD, as gas usage (decontamination oven end of slaughter process, was slightly reduced), but as the results were unsatisfied, the usage of gas was turned back to normal from wk. 46 2022, results on pathogens were ok again and stable now.

5.7 Product release

Products are released after the pre-shipment controls (e.g. packing/ temperature/batches), 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 vertical audit (F-BXT-NL-10084 2022-08-08)

5.8 Pet food and animal feed

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

5.9 Animal primary conversion

The VKI certificate is applied for each supplied batch of pigs/farm, which was checked for during the on-site audit and also during the vertical trace test. All supervised by the Dutch government NVWA who is during working hours on site. Carcasses are chilled within 24 h < 7 C and when chilled in fast chiller < 16 h, which was verified on daily basis as temperature before cutting is measured.
Traceability is maintained by scanning / use of , which was verified during on site audit and the vertical trace test.

Purchasing processes of raw materials (ingredients) and packaging materials are managed by the HQ via approval procedures (incl. GFSI / chain certification status and questionnaires) and contracts. A risk assessment was drawn up by HQ for potential prohibited substances. 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. Site Vion Boxtel BV has no external suppliers of pork meat, except the middles from the Vion site in Apeldoorn (also BRC certificated). Product integrity procedure was seen P-Food 10049 2022-03-21. Supplier risk assessment is a continuous ongoing process. All suppliers are evaluated yearly, parameters are e.g. certification status and quality of deliveries (e.g. illnesses). See also clause 3.5.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
5.1	No product design
5.3	No allergens on location as ingredient
5.7.1	No positive release
5.8	The site does not produce pet food and animal feed.

6. Process control

6.1 Control of operations

Process conditions and methods are well monitored and re-validated when necessary. In case of breakdown of critical equipment, a system and procedures are 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 aspects 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 at the SSOP forms for process controls, such as temperatures.
Via a camera system and the there's a real time overview at the control of operations.
Special attention for animal welfare aspects with camera supervision including a test with Artificial Intelligence aspects in it.
The cooling system is linked to the , (see also minor NC on 4.15.3). In case of failures in the system an alarm system is in use, verified during the audit and vertical trace test.
Daily meetings between management of the slaughtering department and maintenance department about break downs. This approach has reduced the level of breakdowns in the slaughtering department. This process will also be being implemented for the whole site.

6.2 Labelling and pack control

Label checks are taken place at the start and end of production batch. During the site audit in the cutting department the product change is monitored from art. numbers , The line was emptied including the site products. Labels were changed via the system . Label check of 1st label was seen. No need for change of packaging.

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 balances were seen. This product is checked for weight and actions are taken accordingly (e.g. repack or dispose). If bulk products are made (e.g. traceability test), then products are weighed at a predefined frequency and records are kept. Interviews indicate a correct knowledge of actions to take and of legislative requirements. B-to-B product are labelled with real weight, but all weight before loading/dispatch, recorded in the ERP system. Weight control for country of sale is organised by HQ for all Vion sites.

6.4 Calibration and control of measuring and monitoring devices

Critical measuring equipment are listed in P_BXT-NL- Kal 10123: thermometers (CCP related), weighing scales, fat analyser 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 of for gas measuring (2023-03-15 no), metal detection by and control 2022-06-09, dosing cleaning chemicals

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
6.1.7	No products outside scope

6.2.4	No on-line label verification.
6.3.3	No online check weighers

7. Personnel

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

There's an introduction training (incl. HACCP, food defence, allergens and general hygiene rules) for new employees including temporary workers. Employees engaged in the control of CCP's are trained regularly. Employees working in the blue part of the slaughtering department and stable get a dedicated training about animal welfare aspects.
For the following employees training records are verified, if they fit to their function, incl. the test results of the training followed after finishing the training sessions:

Training and monitoriging records checked from employees:

- # 2018-06-14 initial HACCP 2021-02-01
- # HACCP 2022-04-25, CCP2-5 2022-05-21
- # HACCP 2022-09-23
- # HACCP 2023-04-04
- # 2021-01-19 (introduction film), was retrained, but test result could not be found
- # HACCP 2020-03-16, was retrained, but test result could not be found
- # HACCP 2022-04-21
- # HACCP 2022-06-13

Seen several employees moved from the employment agency to become a permanent worker, then the training information was not always moved with them. The employment agency take care in the first place that employees start working after retrained by the HACCP introduction film incl. making the test. During sample taking of this review was seen some that not always could be shown the proof (test results(paper) if the training was demonstrably performed on annual basis as defined in the company rules. Review method and frequency /re-training of activities relating to control measures was not demonstrably defined. ***Minor NC on 7.1.7***

Teamleaders and managers were trained past year in several sessions and groups on coaching on the working floor, project "peolple matters", a training development their leadership including culture development.

Level of competence is demonstrated through staff interviews during the audit round, by means of explination given about the activities relating to control measures and critical control points.
Ongoing review of training and competency is perfomed through: learning matrix: shiftleaders are informed in time which training is due and must be [erformed again. Facilties are on site for employees to perform e-learning in several languages.

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; version 2023-02-14 The document is covering the requirements of the BRC 9 standard. The wearing of any jewellery isn't allowed, medicines are stored in personal cabins only. Cuts are covered with detectable plaster incl. gloves. 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

Medical screening prohibited / part of the privacy policy in The Netherlands.
Staff are made aware of their responsibilities regarding notification of illness/risks of food borne disease records of this training is in place. The medical screening is part of the intake of new employees and part of the instructions to visitors. 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. (Signature is required). In case of a disease the company is consulting a specialized company doctor. Persons (incl. visitors) 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 and for some workstations more often. Workers are divided per rank and agency by different color hair nets. The standards for personal hygiene, dress code, medicines, jeweler and medical screening have been defined (P-FOOD-10017 version 2023-02-14). 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 specialized laundry , which is an approved supplier of services within Vion.
Re-usable gloves are whashed in house, which is regular checked (gloves to protect from cutting) .
The wearing of sleeves, aprons and work coats isn't allowed during eating and smoking. Disposable hair nets are in use; beard snoods are in use. Cleaning facilities are provided. Work shoes or boots needs to be worn, facilities to clean the soles are available in the hygiene corridors at the entrance of the production facilities. As a result of the Covid 19 protocol face masks are still worn in some areas (specially deboning and packing areas, as people are working close to each other).

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
7.4.6	No items of personal protective clothing that are not suitable for laundering are provided.

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

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

9. Requirements for traded products
9.1 The food safety plan - HACCP
Not applicable
9.2 Approval and performance monitoring of manufacturers/packers of traded food products
Not applicable
9.3 Specifications
Not applicable
9.4 Product inspection and laboratory testing
Not applicable
9.5 Product legality
Not applicable
9.6 Traceability
Not applicable

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

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

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

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