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	none		
Justification for exclusion	Click or tap here to enter text.		
Audit start date	2023-11-13	Audit finish date	2023-11-16
Re-audit due date	2024-11-13	Head office	Yes

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

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit programme	Announced
Previous audit grade	B+		Previous audit date	2023-06-13	
Certificate issue date	2023-12-19		Certificate expiry date	2024-12-25	
Number of non-conformities			Fundamental	0	
			Critical	0	

2. Audit Results		
	Major	0
	Minor	8

3. Company Details			
Site address	Boseind 10 5281 RM Boxtel		
Country	The Netherlands	Site telephone number	
Commercial representative name		Email	@vionfood.com
Technical representative name		Email	@vionfood.com

4. Company Profile					
Plant size (metres square)	>25K sq.m s	No. of employees	501-1500	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)	Click or tap to enter a date.	Click or tap to enter a date.			
Other certificates held	ISO9001, IFS PIA, BLK, IKB, QS, SQMS,				
Outsourced processes	No				
Outsourced process description	Click or tap here to enter text.				

4. Company Profile	
Regions exported to	Europe Asia North America Oceania Africa Choose a region
Company registration number	EG61NL
Major changes since last BRCGS audit	Changes in the organogram, new HR manager and split site plant position (now two persons instead of one).

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 about pigs per day in 2 shifts. Main customers are industrial meat processing companies in Europe, Asia, USA and Australia. Snit hams 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 is 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.

The site is audited against the requirements of BRC GS FS 9; 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 announced on site, and well before due date as company promised their customers a score above B+. Therefor a new full audit was conducted, and a new audit window is erected.

5. Product Characteristics					
Product categories	01 - Raw red meat 03 - Raw prepared products (meat and vegetarian) Category Category Category Category Category Category				
Finished product safety rationale	Chilled red meat/organs, 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 Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen				
Product claims made e.g. IP, organic	Welfare (GB = Good Farming Bacon) and BLK 1star (FS = Good Farming Star				
Product recalls in last 12 months	No				
Products in production at the time of the audit	Pork from carcasses and cut to the technical and customer specification, organs.				

6. Audit Duration Details			
Total audit duration	28 man hours	Duration of production facility inspection	14 man hours

6. Audit Duration Details	
Reasons for deviation from typical or expected audit duration	Repetitive processes with similar tasks in 2 shift system
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	
	Site Manager	X		X	X
	QA manager	x	x	x	x
	QA employee			X	
	QA employee			X	
	QA employee			X	
	Manager Veredeling	X			X
	Manager Slaughtering	x	x	x	X
	Manager Productie	X	X		X
	Manager logistics		X		
	Manager Planning	X			X
	Manager HR			X	X
	F&A				X
	Assistant maintenance manager	X	X	X	X
	Assistant maintenance manager	X	X	X	X

	Manager DMM		X		
	Manager Slaughtering		X		
	Foreman Slaughtering		X		
	Employee Reception Pigs		X		
	Sales officer			X	
	Manager Facilitair ai		X	X	
	Assistant manager Facilitair			X	
Employees of departments			X		

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2023-06-16	BRCGS issue 9	Unannounced	Pass

Document control			
CB Report number	RQA9832737 job 6012900		
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	In the management review (MR) format is not taken up information confirming the actions from the Food Safety and Quality Culture Plan. Timescales of actions are not demonstrable set. Latest reassessment (input for the MR) is not finished yet but does not contain timescales of these actions.	This cannot be corrected on this short terms.	We have drawn up a sample format to monitor food safety culture through the quarterly report See attachment 1	We have expressed what we want to monitor, but had not yet found a format to adequately monitor this	2023-12-08	
2.3.1	In P-NLFood-10165 v23 dd 9-5-2023 is the best before day related to production date. Theoretically this is wrong and should be slaughter-day. Determination of BBD not correctly described.	A proposal to change the procedure has been drawn up, with a total column from the day of slaughter being added.	By adapting the procedure it is immediately clear how many days the shelf life of the various products is. See attachment 2	Because the shelf life depends on the packaging method, it was decided to trace this back to the day of production	2023-12-08	
3.5.3.3	Complaints to suppliers not recorded on the correct form and not distributed to all	The correct form and associated procedure, in which the relevant	The employee has now excess to . He is instructed to use the form from and to follow the	The employee in question had no excess to .	2023-12-08	

Minor						
	relevant persons (not clear who are the relevant persons). Not demonstrable that complaints to suppliers are included in the corrective and preventive action procedure.	persons are mentioned, has been provided to the employee in question. The complaints are included annually in the assessment of the suppliers.	procedure. If there are any deviations, they are followed up according to procedure and included in the annual supplier assessment. See attachment 3A / B	Therefore he was still using the old form and was not aware of the procedure.		
3.11.1	Hygiene instructions in the emergency exit procedure does not comply with hygiene rules. (No instruction on wearing of the jackets outside; and hygienic mats are bought to guide quicker re-access to restart operation which is not a correct procedure).	This procedure is removed. the company emergency plan procedure has been adjusted	It was discussed with the author of this procedure that such matters should always be published via the manual. The company emergency plan has been adjusted accordingly and this procedure will continue to be followed after approval. See attachment 4	The instruction was not an official manual document, which also did not take into account all the conditions of the hygiene regulations.	2023-12-08	
5.1.1	Sales procedures (P-NLFOOD-10042 dd 15-12-2012) to guide correct client/article specifications do not state current way of working. New artwork of boxes is introduced however packing specifications are not adjusted. (Eg art and) Also 'Emballage' book dd 02-05-2023 does not show correct boxes with adjusted artwork. Product Tong	the relevant departments have been informed to adjust the observed deviations.	Sales will adjust the procedure. so that the procedure is up to date again and is supplemented with the approval of new logos / layout on boxes and labels. And record that the specifications are also approved by the customer. In addition, the packaging catalogue is also updated with the adjusted logos on the boxes. See attachment 5A/B/C	It appears that changes in the central processes and quality systems were not properly recorded in the procedures.	2023-12-08	

Minor						
	(art) is packed on fixed weight 9,8-10,3 kg however confirmation of the customer on this specification not demonstrable.					
5.1.2	Plastic PE bags used in the slaughter line to transport organs and byproducts do not have evidence to confirm it complies and is suitable for its use.	We stopped using these bags, instead we use crate bags.	The department management of the slaughterhouse has been instructed to only use materials that meet the stated requirements. Facilities department has contacted central purchasing to urgently obtain food grade bags. these are now in use. See attachment DOC 133710.pdf	When, due to changes in legislation, we had to hang the organs with the carcasses, the slaughterhouse used bags they already had. Without thinking that these had to be food grade.	2023-12-08	
6.2.2	Product is produced in the packing department without (correct) packing specification. Control on F-BXT-NL-10154 is done however not demonstrable that label and box are the correct ones.	Department management immediately contacted MDM. The customer card was immediately adjusted with the correct label.	All customer cards have been checked by department management and it has been checked whether the customer cards correspond to the correct label. The comment was discussed during the huddle and there will be more monitoring of correct customer cards. See attachment 7	The label had been adjusted, unfortunately this was not changed in the last update of the customer card. Unfortunately, the employee who checked the label did not do this based on the customer card, this was discussed with the team.	2023-12-08	
6.3.3	Not demonstrable that tare weight of product Tong (is deducted from the	The liner and foil will be added to the tare.	Those involved have been informed that the tare of the tongues in the box must be	When drawing up this customer card, the bag and insert for	2023-12-08	

Minor						
	gross weight to calculate fixed weight of 9,8-10.3 kg. Is the foil included in the tare or in the meat?		adjusted. This means that the software and the customer card can only be adjusted with the correct tare after approval in accordance with procedure P-NLFOOD-10047 See attachment 8	packaging the products were not taken into account. which is why this is also programmed in		
7.1.1	Not demonstrable that external contractors sign for work permit and hygiene clearance instructions. Work permit form (without document control) is not correctly filled in (eg contractor and no procedure available to guide correct use.	The document will be included in and the relevant employees will be instructed.	The document in question has been included in , making it a managed document. The persons concerned have been instructed to act in accordance with the instructions on the form and to carry out the inspection accordingly. See attachment 9	The document has been drawn up mainly for safety and working conditions. the control of the document was not directly taken into account. furthermore, the follow-up was not known to all those involved	2023-12-08	

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

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

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

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

Audit team

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

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
			Auditor	2023-11-13	08:30	17:00	P	
			Auditor	2023-11-14	08:30	17:00	P	
			Auditor	2023-11-15	08:30	17:00	P	
			Auditor	2023-11-16	08:30	12:30	P	

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 manager TK. 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.

By HQ of Vion, a Food Safety Culture procedure has been published (P -Food-NL-10017 14 Feb 2023). The procedure includes an action plan for the site, indicating and measuring how and which activities will be undertaken within a defined timeframe (SMART).

During the audit the implementation of this plan was also verified on the factory floor, local site plan was seen P Food 10059 2023-04-03 and all other departments that were audited. Seen was, that employees are stimulated in their behaviour by team leaders and buddies. Clear individual and group values, attitudes competencies and patterns of behaviour 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.

Clear Food safety and legality objectives 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-nov/concept). The progress of realization of objectives are monitored via the Management Review called Q-report. 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 2022–June 2023 is seen which was confirmed and signed by the site manager and quality manager. Seen minutes of this meeting. Corrective actions are defined and added to the X-matrix of the current year. Present during the management review meeting are two site managers, production manager, maintenance manager, QA manager, planning department, finance manager, HR manager.

The company is working with the VOS (VION Operating System/Lean management) 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.

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 times per year) meeting date: 2023-08-23. Last senior leadership management (TIER 2, 1 x week every Tuesday).

All previous non-conformities have been closed out suitably (also 13 minors of last audit and 2 majors of the internal 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/ management but depending on the risk and impact of a deviation/non-conformance. Where necessary an improvement plan was be written. Overall action plan (Excel) which is updated after every meeting.

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 v41 2023-10-06 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 were who deputies in the absence of the responsible persons. Job descriptions are reviewed, which were in line with the responsibilities. 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 managers are highly involved driving food safety and quality culture improvement based on 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.

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.

The BRCGS logo is not used by the company. The logo is used on the website. Copy of BRC version 9 standard is available.

Minor: In the management review (MR) format is not taken up information confirming the actions from the Food Safety and Quality Culture Plan. Timescales of actions are not demonstrable set. Latest reassessment (input for the MR) is not finished yet but does not contain timescales of these actions.

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

2. The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles: an assessment is made of microbiological, chemical (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. 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 year one of the goals is to perform a special HACCP training for leaders and managers, to increase awareness on food safety and culture knowledge.

The company has introduced a special HACCP training (also because of FS Culture improvements) for shift leaders/manager of shifts and departments. These were followed in 2022 and 2023.

HACCP system scope is laid down in P-PBX-NL-10170 and covers relevant processes and all products on site. Product is suitable for regular consumer groups. Different product groups are applicable (also in P-BXT-NL-10170) 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:

- Food / Fresh pork meat (Dutch origin).

The intended use of the product by the customer has been clearly defined. The intended use does not exclude any consumers (no YOPI excluded).

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, deboning, positioning, packing, processing and storage and dispatch. There is an annual check of the flowchart by the HACCP team. This was done on 2022-07-08 (general review). The flow diagrams verified reflect the different steps of the production process (seen flowcharts P-BXP-10026 Stroomschema's). Flowcharts, risk assessments and control plans are available for all different product type, leading to an extensive documentation. Last yearly verification was 2023-08-23. The flow diagrams accurately reflect the production processes.

The HQ Vion organisation has made a general HACCP assessment, for raw material and all process steps and has identified all PRP's, CP's and possible CCP's. In the local HACCP assessment, this is in P-BXT-NL-100116. The hazards and associated risks against the steps and raw materials including 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 (included in the general assessment P-FOOD-10000). It is clearly described how to choose to come to PRP, CP 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. This document identifies all the PRPs and provides a description of the different hazards controlled by these PRPs.

- 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 (including 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. STEC, Salmonella, Listeria), allergens, chemical (e.g. PCB's, perchlorate, etc), 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/CP/PRP (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) Overview of all CCP's and CP's is in P-BXT-NL-10118 v15 03-07-2023.

- 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 on control procedures, critical limits and corrective measurements are present. 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.

There's a yearly verification of the HACCP system (as part of the MR , the report of the last reassessment (in concept/see minor in chapter 1, discussed July 2023) reviewed period is 07 2022– 06-2023) 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 over Oktober 2023.

Changes in process and products are validated by the food safety team. No relevant changes since last audit.

Minor: In P-NLFood-10165 v23 dd 9-5-2023 is the best before day related to production date. Theoretically this is wrong and should be slaughter-day. Determination of BBD not correctly described.

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

3. Food safety and quality management system

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

) 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 available supporting working instructions and procedures as part of the management system. Documentation is up to date. Forms are available in , most in Polish or Dutch.

Document control: documents seen during the audit were complying, although there are so many documents in use and access is limited to few people, that improvements can be made on this point. Changes are collected in .

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). There are also documents in use from other sources as maintenance and operation/VOS, not always in good management but no relation with the food safety aspects.

3.4 Internal audits

Reference procedure: P-Vion-10010 internal audits. The scope of the internal audit program covers the Food safety and quality management system ( ), 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. Audit management is online in were nonconformities are demonstrably followed up of all internal, second and third party and client audits.

The internal audit plan 2023 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 2x/ 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: Report by LZ dd 25-10-2023 with 3 annexes (1. BRC FS/fundamentals, 2. IKB 2022, 3. IFS PIA)

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

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 prestart 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. Seen all pre-SSOP and SSOP's of the dates in the trace test (>40 records).

The SSOP's are part of the documented inspection plan of the site additional to internal audits. The system of SSOP (digital system) is effective: deviations of operations seen during the audit which were demonstrably documented on this SSOP.

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 takes 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 during the assessment on site 30-10-2023 on types of QS/ GF/ Welfare / IKB. 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 according Procedure supplier's audit (P-FOOD-10023), Procedure food supplier assessment (P-FOOD-10025) and 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 digital application: input from Vion Boxtel about approved suppliers of packaging materials and services. Suppliers of primary packing material must be BRC Packaging or IFS Pack certified. Services including cold storages seen supplier evaluation of cold store

performed by a supplier audits by a HQ auditor although is BRC certified. 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).

No agents used.

Minor: Complaints to suppliers not recorded on the correct form and not distributed to all relevant persons (not clear who are the relevant persons). Not demonstrable that complaints to suppliers are included in the corrective and preventive action procedure.

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. A veterinarian check at animal welfare and health aspects is carried out by the local veterinarian (Dutch Authority / NVWA). Suppliers are certified but are also audited random by Vion Farming themselves.

Vion Boxtel BV is also processing pork middles, delivered by other 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 Korenmolen 13, but management by the HQ and included in the inspection rounds. (In the internal audit of 30-10-2023 this control was found insufficient, and actions were taken so as seen during this audit it is inspected according procedure on F-BXT-NL-10122.

On location Boxtel, there is an internal warehouse managing the packing materials on site. They keep enough packing material on stock, order at Korenmolen 13 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 by HQ and evaluation input comes from all VION sites.)

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 (Distrifresh)

3.5.4 Management of Outsourced processing

na

3.6 Specifications

Specifications of finished products are managed by the HQ department master data management (about 13.000 articles / specifications YTD).

This MDM (Master Data Management) is 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.

- Tongue art
- King size tenderloin
- Blue LDPE bag
- PE bags for organs in the slaughter department (see minor in chapter 5 as this was a new bag and spec was available but not de food grade compliance.

Specifications are 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 for CoA and spec of Customer on Ham 5D, Ham 4D.

3.7 Corrective and preventive actions

Several systems on correction and preventive actions in place. For operations the 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. Corrective actions related to pest control, pre SSOP, SSOP are recorded and demonstrable. In case of unfavourable 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. 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.

3.8 Control of non-conforming product

Reference procedure is P-BXT-NL10131 2015-11-23. (blocking procedure) and blocking is on F-BXT-NL-10064 dd 17-10-2016.

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 middle cutting area; no deviations seen. The procedure for non-conforming product defines how non-conforming product is identified, quarantined and disposed of.

Returned goods are managed by P-Food-100181. Only authorised personnel (QA officers 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 sections in the final product warehouses for non-conforming products, returned goods (none seen during the audit). 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 and mass balance also induced by the IFS PIA requirements on food fraud. It covers raw materials through work in progress to finished product including packaging

materials and distribution according to 'Procedure traceerbaarheid' (P-Food-10015 2022-02-23). Procedure includes the required documents to complete the traceability and the mass balance. The traceability is according to requirements country of sales e.g. China, USA, tested during the specific annual China/ USA audits. This system is fully based on applications as and other applications written documents, batch codes and bar codes. System continuously in development.

- 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)
- Crates in the Cutting departments and in the new section Middles have chips and are given info per line. Readers on several places.

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 and other audits. Reports sampled of these traceability tests were seen trace test 2023-07-13 on Kingsize tenderloin from VION Apeldoorn. Packed in Packing department and shipped to Coldstore Den Bosch.
During the audit a vertical test is kept for the first couple of pigs arrived at 15-08-2023.
The company was showing a sustainable system of tracking and tracing upstream from received UBN/pig number to finished products and of product and corresponding documentation from dispatch back to the slaughter process and reception of pigs.
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 complaints, 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. 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 recall team and complies with these requirements.
The recall procedure is tested 1x / year. Last mock recall was 2023-07-13; report is verified; no remarks. No recalls since last BRC audit. One GFL announcement by Dutch authority as in September several farms were closed due to a residue of pesticide was found in veal relating to some pig farms with the same pest contractor. On order of authorities, liver of a couple was rendered.

Minor: Hygiene instructions in the emergency exit procedure does not comply with hygiene rules. (No instruction on wearing of the jackets outside; and hygienic mats are bought to guide quicker re-access to restart operation which is not a correct procedure).

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.1.5	No purchasing of Agents or Brokers
3.5.4	No Outsourced processing

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. The site is large an also contains factory ENCEBE and intestines processor. Routing to employ over persons daily including parking, entrance, staff facilities, maintenance and facilities. Also parking space permitted by authorities for 6 lorries with pigs and 3 waiting places and 4 docking places.

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 . Over cameras installed inside and outside. 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. 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. And a new porter house for the outgoing lorries with meat and 4 weighing bridges for meat are in place.

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 can 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.

There's a technical area above the new production area of the middles and packaging area for technical parts like the ventilation system.

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. Permanent swipers available to remove condensation from walls, ceilings and evaporators, etc.

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 and P-NL-Food-10196. 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, results available of 2023-03-17, TPC was too high, re sampling was done on 2023-03-23, ok. Other results were within the standard.
Dry ice is used for cooling purposes (taken up in microbiology testing program), CO2 gas is used for packaging purposes and stunning of pigs. 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, managed well. Regular cleaning (changing and washing) of air socks is 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. Belts in contact with food 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. Equipment that is not in use was seen stored clean in the production area or in a separate area.

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 cooling system, 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 (mostly slaughtering) 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 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 10 lubricants available to greasers during the weekend; MSDS sheet were seen, and lubricant is food approved free from allergens. Automatic lubricant system in use for the main process like transport chains.

Maintenance people (>50 persons) are trained on hygiene and contamination prevention. Main Maintenance Department is located in a separated building from the production. Per department there are production employees appointed for operator functions and small maintenance and repair activities. Recognisable by black clothes as maintenance employees wear green clothes.

4.8 Staff facilities

Canteens and (gender specific) 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 all 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 stored separately and away from production. The outside (bulk) storage of chemicals managed by the cleaning company is safe, acid containing chemicals were stored on separate drip tray from alkali containing chemicals. Authorised access by cleaning company and production department. MSDS available and specifications confirm suitability for use in food processing industries. Seen chemicals in use . MSDS documents and specs are seen, and the used dosages are in conformity with the prescribed dosages. Employees handling cleaning chemicals are demonstrably trained.

4.9.2 Metal control

The HACCP study has determined that metal detection is not a 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

A glass / hard plastic register is in place and records the location and condition of glass / hard plastic on F-BXT-NL-10057 2023-02-07 Glass / hard plastic audits are regularly (4x per year) carried out by QA and daily by production department on Pre-SSOP and SSOP. Besides daily check, 1x /3 months audits are executed by the verification of the building inspection by the maintenance department, which is documented as a map of the specific department. Verified for the most recent building inspections eg “Veredeling” on 02-10-2-23 and slaughtering department on 19-07-2023. Follow up of action points is demonstrable.

4.9.4 Products packed into glass or other brittle containers

na

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 and x-ray detection steps as a CP. Only BtoB products, the sensitivity of the control measures is appropriate, the sensitivity of the metal detections is listed for all metal detectors on site. This includes the combination with used test rods size, type of FP to test, volume size of boxes and type of product to detect (density).

Metal detection on technical meat parts (BtoB products) is more often performed to protect equipment. Checks are performed every hour. Employees for monitoring are trained by instructions.

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.

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 CP.

CP which is determined, including critical limits, all checked beginning/end of the day, every 1 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 4.0 mm - SS 6.0 mm

Tongue: Fe 2,0 mm – non-Fe 2.5 mm - SS 4.0 mm

Corrective actions are clearly defined according to the CP 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 CP was demonstrated, including a right way of recording during the audit during several processes. These were performed all well.

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

4.10.4 Magnets

na

4.10.5 Optical sorting equipment

na

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

4.10.7 Other foreign-body detection and removal equipment
na

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: rinsing, foaming, rinsing, disinfection, rinsing. This is done on a daily base. Four of five days alcali cleaning and on Wednesday acid cleaning. Seen several records of cleaning during the audit (pre-SSOP) 2023-08-15 until 2023-08-19, of the trace test for all areas from 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. Limits are set for rinsing water residues for the washing of -crates and other crates. Corrective action is defined on measured pH 8.6 and pH 8.8 on the SSOP. The 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. Temperature is monitored in ; 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. Examples seen of results not ok (3, 4), (cleaning company) was demonstrably informed, re-sampling is done and if still not effective, extra measures applied. Environmental monitoring is based on Listeria swabs, 5 swaps are random taken /month. Results of 2022/2023 YTD are verified. There are positive results and 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, 2023-11-13 again positive resampling during this audit.

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, so no disposal of trademark waste. 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 waste.

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 after treatment 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

na

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 demonstrable over the online application, . 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, contractors arrive on notice. In the applications are 6 plans taken up. Yearly QA inspection taken place in December 2022.

Reports of the inspections (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 . Latest inspections by Pest manager on 07-11 and 19-9-2023.

4.15 Storage facilities

Storage of packaging, ingredient and product are seen in proper condition, well organised and the storage facilities are suitable in relation to the operation. Warehouses are clean, dry, well-ventilated spaces protected from dust, condensation, fumes, odours 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 system. Used temperature standards are in conformity with the legislative demands about temperature. Is verified for the temperature in storage areas 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.
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, the stock rotation of products is performed fully correct in relation to the defined shelf life. In dispatch 2 appr 80% of goods is transported to cold storage, to extend shelf life and prepare according to customer needs.
This part of the production output is distributed to contracted frozen storage locations (GFSI certified), contract is managed by HQ. Supplier audits are performed for all cold stores used, as seen in the supplier evaluation.

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 in . There is 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 (, digital system). Seen this CCP on 3 places correctly applied.

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 Group. There are no product development activities at the Boxtel site (changes are mostly changes in snit, packing material and B to B). New processes are validated before implementation. The MOC procedure is used for the validation of new processes, no new processes introduced past year.

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.

Minor: Sales procedures (P-NLFOOD-10042 dd 15-12-2012) to guide correct client/article specifications do not state current way of working. New artwork of boxes is introduced however packing specifications are not adjusted. (Eg art) Also 'Emballage' book dd 02-05-2023 does not show correct boxes with adjusted artwork. Product Tong (art) is packed on fixed weight 9,8-10,3 kg however confirmation of the customer on this specification not demonstrable.

Minor: Plastic PE bags used in the slaughter line to transport organs and byproducts do not have evidence to confirm it complies and is suitable for its use.

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 system is the ''cloud'', all used label printers are linked to . In the client specifications are taken up the lay-out and content of all labels (for boxes (sometimes in and out/tongue) for product (seen for king-size tenderloin).

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 managed by HQ, using the criteria probability of occurrence 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, audited for IFS PIA on 30-10-2023. 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. 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 2022-06-03 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.

5.5 Product packaging

The supplier approval is managed by the central purchase department at Vion Food HQ. The packaging design is recently renewed/updated and managed by sales via MDM. 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 fresh pork and all relevant documents (specification, food grade statement, migration tests) were available. This was not the case for the packing material in the slaughtering line (see minor in 5.1) which was recently introduced. 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 (hygiene grams, 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, so 17 per day) 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. Application used to find trends and incidents.

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, enteron'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:
- Pathogens carcasses wk. 28-46. In 2022 re-samples were needed on carcasses, 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). Weight checks per lorry with the weighbridge, categories defined for approval of deviating weights (mostly because of wind).

5.8 Pet food and animal feed

na

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 during the vertical trace test. All supervised by the Dutch government NVWA who is on site during working hours. Carcasses are chilled within 24 hours to < 7 ºC and when chilled in fast chiller < 16 hours, which was verified on daily basis as temperature before cutting is measured.
Traceability is maintained by scanning / use of ERP system , 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 P-Food 10049, 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
5.3	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.
Slaughtering process including chilling and cutting to specification. Several cutting handling from carcass to technical parts and to 3rd, 4th and 5 cutting specification. Cooling operation is the most critical process and capacity is in place.
In case of breakdown of critical equipment, a system and procedures are in place for the proper handling of product. 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, cutting specifications, pack control.
Via a camera system and the system 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.
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 take place at the start and end of production batch. During the site audit in several cutting departments the product change is monitored. Eg from backs without bone to backs with bone. The line was stopped, equipment modified and started. No removal of products needed. Labels were changed via the system . Label check of 1st label was seen. No need for change of packaging.

Minor: Product 27070 is produced in the packing department without (correct) packing specification. Control on F-BXT-NL-10154 is done however not demonstrable that label and box are the correct ones.

6.3 Quantity, weight, volume and number control

All products are sold by weight, fixed weight or net weight. Multiple 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. Four weighing bridges to weigh all lorries leaving the plot. Weight control for country of sale is organised by HQ for all Vion sites.

Minor: Not demonstrable that tare weight of product Tong (art) is deducted from the gross weight to calculate fixed weight of 9,8-10.3 kg. Is the foil included in the tare or in the meat?

6.4 Calibration and control of measuring and monitoring devices

Critical measuring equipment are listed in P-BXT-NL-10123 v14 29-12-2022: thermometers (CCP related), weighing scales, fat analyser and metal detection equipment, CO2 stunning, Autofom, NIRS, X-ray. These are calibrated. Records are available.
The equipment used to measure on CCP's is identified. List of measuring devices in place. Calibration due date on equipment. Thermometers 102, 104, 116, 124 seen with valid calibration dates (6x/year).

Calibration of oxybaby for gas measuring (2023-03-15 no 937189), dosing cleaning chemicals 4 times per year. .

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

Competence registers available per department/person and per task/instruction, Matrix versie 2022-2023.xlsx, according to procedure Opleidingen v2 (the manual of HR does not belong to).
The recording of the trainings is to be shifted to SAP coming months to have less administration. Found no persons untrained however records sometimes hard to find.
There's an introduction training (incl. HACCP, food defence, allergens and general hygiene rules) for all new and re-entering employees including temporary workers by HR department. Every day new workers are trained and everyday training capacity is available.
Employees engaged in the control of CCP's are trained regularly by QA. Employees working in the blue part of the slaughtering department and stable get a dedicated training about animal welfare aspects.
Labelling is trained on the job (no consumer products), labels are generated by the ERP system and scanned, no label, no identification, this was managed well.
For several employees training records are verified, if they fit to their function, incl. the test results of the training followed finishing the training sessions:

Training and monitoring records checked from employees:
-

Induction, CCP1 on faecal detection, detection of skatole/androstenon. All records were found.

Review method and frequency /re-training of activities relating to control measures was demonstrably defined.
Team leaders and managers were trained past year in several sessions and groups on coaching on the working floor, project "people matter", a training development their leadership including culture development.
Level of competence is demonstrated through staff interviews during the audit round, by means of explanation given about the activities relating to control measures and critical control points.
Ongoing review of training and competency is performed through learning matrix: shift leaders are informed in time which training is due and must be performed again. Facilities are on site for employees to perform e-learning in several languages.

For several instructions on machines and driving with EPWs on helmets labels are glued to indicate that person is qualified. Simple and effective.

Minor: Not demonstrable that external contractors sign for work permit and hygiene clearance instructions. Work permit form (without document control) is not correctly filled in (eg contractor) and no procedure available to guide correct use.

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 BRCGS FS 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 colour hair nets. The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and pictograms present throughout the site. 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 washed in house, which is regular checked (gloves to protect from cutting).
The wearing of sleeves, aprons and work coats is not allowed in the canteens. 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 all 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.