Audit Report

Global Standard Food Safety Issue 8

1. Audit Summary			
Company name	Vion Scherpenzeel B.V.	Site Code	8476525
	Vion Scherpenzeel B.V		
Scope of audit	Deboning, cutting, slicing, salting, seasoning, curing, smoking, (vacuum and/or bulk) packing and freezing of pork. Trading of pork products. Including partly outsourced freezing of pork.		
Exclusions from scope	None		
Justification for exclusion	NA		
Audit Start Date	2022-09-12	Audit Finish Date	2022-09-14
Re-audit due date	2022-12-11	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	Unannounced
Previous audit grade	A		Previous audit date	2021-11-25	
Certificate issue date	2021-12-29		Certificate expiry date	2023-01-22	
Number of non-conformities			Fundamental	0	
			Critical	0	

2. Audit Results

	Major	0
	Minor	10

3. Company Details

Address	't Zwarte land 13, 3925 CK Scherpenzeel		
Country	The Netherlands	Site Telephone Number	+31 (0)33 277 51 51
Commercial representative Name		Email	@vionfood.com
Technical representative Name		Email	@vionfood.com

4. Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3

Shift Pattern	2 shifts 5-6 days a week
Subcontracted processes	Yes
Other certificates held	ISO 9001, IKB (welfare), farming star (welfare), USDA, organic (SKAL), IFS PIA
Regions exported to	Asia North America South America Europe Oceania

4. Company Profile	
	Africa
Company registration number	NL82EG
Major changes since last BRCGS audit	Since April 2022 The Seasoned Diced Pork (SDP) production line is returned to this location from location Boxtel: Pork meat sliced in cubes, diced with white pepper and packed in bags and carton boxes to be frozen on site. Also some extra deboning lines are installed but processes are similar to existing deboning and slicing lines, in existing production areas. Slicing lines are set up based on customer requirements too as specific light intensities above cutting lines and segregation of specific meat (based on origin and quality specifications). Storage of maintenance spare parts and dry storage (of packing materials and dry ingredients for brine and seasoning is situated in the hired building at the opposite side of the road. This April a new quality manager has started after the previous quality manager has left the organisation at the beginning of 2022.

Vion Scherpenzeel BV belongs to the VION Food Group which produces pork and beef. VION Group is one of the biggest meat processing and selling companies in Western Europe and sales is worldwide with a focus on Europe and Asia (China, Japan, Korea). The site employs approx. people working basically in a 2-shift system from Monday to Friday, occasionally production on Saturdays.

VION Scherpenzeel BV is specialized in the production of cured and/or smoked bacon by deboning, cutting, slicing, salting, curing, smoking, (vacuum and/or bulk) packing and freezing of pork (mostly middles). Also other product are produced like sliced pork meat vacuum packed in consumer packs, bulk packed in boxes (B to B), SDP Pork meat sliced in cubes, diced with white pepper and packed in bags and carton boxes to be frozen on site and debining activities incl. packing activities are performed. Only pork meat is processed, and final products are based on welfare and good farming breed programmes of the pigs (EKO, GB, GF, QS, standard and FS (farming star). The raw materials come from own slaughterhouses, which are part of the VION Group in the Europe (Netherlands, Germany) and from some other non-Vion slaughterhouses in France.

Only B2B delivery. The storage and transport of finished products is partly outsourced (both cooled and frozen) as sister company Distrifresh is now involved in transporting from and to own VION plants. (Not in the scope of this audit). Also outsourced is the deep-freezing of some products to external cold stores. (partly outsourced process in scope). Furthermore, there is onsite cleaning of crates and pallet boxes.

The company is under veterinary control for exporting activities (from cold store), is USA approved and has several client status e.g. ( ), Official veterinary approval number: NL 82 EG. Packed pork products which are bought from Vion International B.V. (produced by Vion sites, maily Vion Boxtel) are frozen after reception, stored and palletised for export in containers (in scope: Trading of pork products (BRC section 9 added))

5. Product Characteristics					
Product categories	03 - Raw prepared products (meat and vegetarian) 09 - Raw cured or fermented meat and fish Category Category Category Category Category				
Finished product safety rationale	Temperature < 4ºC (meat preparations), < 7ºC or < -18ºC (other products), vacuum packaging (bacon), dosage nitrite (> 1 gram/litre brine / > 60 ppm on ingoing product). All to be heated prior to consumption.				
High care	No	High risk	No	Ambient high care	No
Justification for area	Appendix 2 applied. All products have to undergo full cooking step prior to consumption. Smoking process step is not considered as a sufficient heating step justification 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				
Product claims made e.g. IP, organic	IKB: FS (farming star / “beter leven”) and GB (= GF + welfare) and GF (good farming) + Qualität und Sicherheit (QS) + Organic (SKAL)				
Product recalls in last 12 Months	No				
Products in production at the time of the audit	Deboned shoulders, bacon, smoked, salted, SDP meat packed in bags 10 kg, slices pork meat vacuum packed 200 gram, spare ribs packed 10 kg in liner in boxes, trimmings 80/20 and other products from pork middles and shoulders.				

6. Audit Duration Details			
Total audit duration	22 man hours	Duration of production facility inspection	11 man hours

6. Audit Duration Details	
Reasons for deviation from typical or expected audit duration	No deviations, the audit was calculated on 22 man hours: calculation was 20 hours, 2 hours on site were added because of section 9 was included (traded pork, delivered only from 1 supplier)
Next audit type selected	Announced

Audit Duration per day			
Audit Day	Date	Start Time	Finish time
1	2022-09-12	12.30	17.15
2	2022-09-13	08.15	17.30
3	2022-09-14	07.30	16.30

Audit Team	Auditor number	Name	Role
Lead Auditor			Lead Auditor
Second Auditor	-		Please select

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
`lant Manager			x	x
r / QA Manager		x	x	x
' QA Officer	x	x	x	x
ı / HR Officer			x	x
deputy Maintenance Manager		x	x	
Manager Operations	x	x	x	x

manager salting smoking gammon		x	x	x
-shift leader slice trimming and cutting line 2		x	x	x
- shift leader slice			x	
(Teams) – manager planning			x	x
manager packing / coldstorage			x	x
Manager facility department			x	x
HR administrator			x	x
Production/deboning and packing employees			x	

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

Document control			
CB Report number	RQA9832747 - 4672222		
Template Name	F834 Food Safety Audit Report Template v11		
Standard Issue	8	*Template issue date*	2022-02-15
Directory allocation	Food	*Version*	1.0

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	Clause	Detail	Critical or Major	Re-audit date

Critical			
No.	Clause	Detail	Re-audit date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	2.6.1	The annual onsite verification of flow-diagrams was not fully clear performed, as still some items were missing like some steps of the freezing process until loading and the SDP/ slice flow was not fully complete. **Closed to be verified during next on site audit**	The flow-diagrams are being up-dated in the month November `22. Procesbeheersplan is already updated, for the SDP Pepper is added(13.3) For the SLICE the underleaver is added(8.6) **ANNEX 1**	The manual is being up-dated, this is going to be finalized at the end of 2022, we have an un-announced internal audit in December`22, this subject is to be audited by (VION GROENLO Retail) unannounced medio December. **ANNEX 2**	Due to the change in management and the transition of VION Scherpenzeel not all the flow-diagrams are up-to-date.	2022-10-22	
2	2.7.1	In addition to incomplete flow-diagrams (Minor NC 2.6.1), also some steps were missing in the Hazard analyses freezing e.g. packing and loading steps and slicing/SDP e.g. slicing of cubes and using foil in between during packing **Closed to be verified during next on site audit**	The flow-diagrams are being up-dated in the month November `22. Procesbeheersplan is already updated, for the SDP Pepper is added(13.3) For the SLICE the underleaver is added(8.6) **ANNEX 1**	The manual is being up-dated, this is going to be finalized at the end of 2022, we have an un-announced internal audit in December`22, this subject is to be audited by (VION GROENLO Retail)	due to the change in management and the transition of VION Scherpenzeel not all the flow-diagrams are up-to-date, therefore as	2022-10-22	

Minor							
				unannounced medio December. **ANNEX 2**	missed in the HACCP analyses		
3	3.6.4	Specifications of finished products are provided in two types: MDM and client specifications (managed by head office), not fully clear is which of those provides the key data to meet customer requirements (specific needed for production) and if these specifications are up to date /reviewed sufficient frequently (min. every 3 years). **Closed to be verified during next on site audit**	All needed information is available, for new products al available information is to put in validationdashboard of vion. (cuttingbook) Due to developments from QA central. We now get the productspecifications from **ANNEX 3**	QA central department is working on a new way of working concerning specifications. This is to be finished at the end of December `22. The new way of working to be implemented in January `23	How do specific customer requirements be known at MDM to be translated in to product specifications for the different locations of VION. This question is currently under the attention of QA central and MDM, see proposed action plan.	2022-10-22	
4	3.7.1	Some observed non-conformities were not always handled correctly: -the action list includes open actions as result of internal and external audits, during monitoring this list was seen that	All open issues are resolved or planned. **ANNEX 4**	The action list is put on the agenda of the local Management Team, this way it gets weekly up-dates and follow-ups.	due to the change in management and the transition of VION Scherpenzeel	2022-10-22	

Minor							
		some of these actions as result of an external audit performed in January 2022, were still open and overdue. -condense which was seen at the bacon department was not demonstrable removed directly to avoid further issues. **Closed to be verified during next on site audit**			not all actions where closed in the action list. Some of the NC's where resolved but not noted in the action list, some had to be resolved.		
5	4.2.3	IFS PIA and integrity training were held but not clear was if all employees were demonstrably trained in site security and food defence. **Closed to be verified during next on site audit**	We conducted an internal Food-Defense audit with a new employee, starting at QA(03-10-2022). With the results of the audit we created awareness and the importance of Food-defense and site security. **ANNEX 5**	The training will be added to the introduction-program "werken bij VION" and training. The Local HR department is going to add these at the end of November`22.	The specific training of Food-Defense and site security was not on the standard training program.	2022-10-22	
6	4.4.10	In the bacon salting/smoking area, the ventilation and extraction to prevent condensation was not adequate as condense was seen on the ceiling and against ventilation equipment **Closed to be verified during next on site audit**	We clean the ceiling etc. every time the doors of the Smoking chamber are opened. There is an order placed for a technical solution: there is a fan going to be placed aimed at the ceiling to prevent the condensation to occur. **ANNEX 6**	The planning of the technical department is to do this 15-10-22.	Due to the high temperature differences in the room we get some condensation issues at smooth areas.ir flow is not good	2022-10-22	

Minor							
					enough to resolve this		
7	4.10.1.3	After the mall function of the Xray (slicing) which was seen on audit day 2, not clear was if the corrective action was fully clear completed: Not fully clear was if isolation/ quarantining and/ or re-inspection of the products checked and produced since last successful test was considered/ needed. Motivation for minor nonconformity is that all products are metal detected after they have been frozen and the chosen Xray program did show minimal difference with the valid one (although it was the wrong one). **Closed to be verified during next on site audit**	The goods where blocked afterwards in the system, we evaluated the situation, all goods pass a metal detector in the following process(freezing). The goods produced, at this moment, where destined for clients do not require the good to be quality controlled by X-ray. We conducted a (MOCK)RECALL (15-09-22) with the company , regarding foreign bodies in the bacon, this test went good and the right procedures were followed.	We have up-dated our training for operators of metal detectors and X-rays. The training is going to be implemented in the week of 17th Oktober`22 and given to the operators and shift leaders.	The right procedures were not followed at the time the mall function was discovered. This happened partly by not being described precisely in the procedures and training material. As well has a human handling mistake.	2022-10-22	
8	4.10.3.4	The procedure for operation and testing the X-ray equipment was not fully clear described and implemented: -The check on using the right program and belt speed (with the	The production registration forms and procedures are up-dated, the operator now has to check a box to declare the ejection mechanism is checked	We have up-dated our training for operators of metal detectors and X-rays. The training is going to be implemented in the week of 17th Oktober`22 and given to	The right procedures were not followed at the time the mall function was	2022-10-22	

Minor							
		right/ effective sensitivity) was not clear included. -The procedure did not specify to test the ejection mechanisms on its effectiveness. -The usage of typical test pieces was not included in the procedure (although communicated via email before production) -no specific procedure in case of mall function /usage of wrong program of the equipment of X-ray/metal detection (in separate procedure is described how to handle non-conforming products/ corrective actions in general). **Closed to be verified during next on site audit**	and working properly. Further the used program has to be noted, this to make sure to meet the described requirements. There is a specific addition made to the procedures that describe how to handle with situations where the control equipment is not working properly. **ANNEX 6**	the operators and shift leaders.	discovered. This happened partly by not being described precisely in the procedures and training material. As well has a human handling mistake.		
9	4.11.1	Some areas /equipment were seen in less hygienic condition: -During processing sliced pork meat, in the slicing department, was seen that a cabin with foil underneath the packing belts was not fully clean and contains a lot of moisture/ wet inside. Also some rolls with foil were temporary stored in there. -In the dry storage were spiderwebs seen in corners and	The cabin is now emptied after use, and the rolls with under leaver foil are stored dry in the non-food area, also the inside of the cabin is now checked daily with the (pre)SSOP. **ANNEX 6** **ANNEX 7**	An addition is made to the SSOP list to make it part of the daily routine control-points. The FD-department is preparing schedules and is going to provide together with the technical department and QA for the proper	The dry storage area is not part of the schedule of the cleaning crew. Own employees are responsible for this area. There were	2022-10-22	

Minor							
		at the ceiling and dirty grey crates. **Closed to be verified during next on site audit**	The dry-storage-area is cleaned on the 8th of October`22. **ANNEX 8.1-8.3** The FD-department is preparing schedules and is going to provide together with the technical department and QA for the proper procedures and equipment for the internal transport containers.	procedures and equipment. The Company is going to provide some employees with training regarding chemicals and how to work with chemicals. This is planned for November 18th`22	no schedules or procedures after the transition to Phase 2 of VION Scherpenzeel		
10	4.11.2	The dry storage is cleaned by the employees themselves. No documented cleaning procedures could be shown for this department including used equipment/material like RVS carts and grey crates to transport dry ingredients and packing material to production (as no carton is allowed in production areas) **Closed to be verified during next on site audit**	The carts are now cleaned every Friday, more often if necessary. An additional cart is requested the investment has to be approved. With this cart it is possible to make a rotating system for the cleaning of the carts. The check on the carts is put on the SSOP of the SDP department **ANNEX 9**	The FD-department is preparing schedules and is going to provide together with the technical department and QA for the proper procedures and equipment. The Company is going to provide some employees with training regarding chemicals and how to work with chemicals. This is planned for November 18th`22	this area is not part of the schedule of the cleaning crew. Own employees are responsible for this area. There where no schedules or procedures after the transition.	2022-10-22	

Minor							

Comments on non-conformities
1

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Policy documented in P-SPZ-NL-10158 and signed off by the Site Manager on 2022-05-05. Policy deployment using the X-matrix specifying the interaction between strategic / plant objectives, responsibilities and key performance indicators.

The whistle blowing policy communicated in several languages is imbedded in the VION organisation since several years and the corporate IAD (Internal Audit Department) takes care of verification of effectiveness.

There is made a project plan 11-2020 on food safety culture as it is included in the x-matrix with corresponding targets, updated recently 2021-12-22 (as part of the X matrix/MR document). Examples of these projects are focus on specific training of employees (also temporary employees) and creating more awareness on food safety. Focus on responsibilities on FS not only by QA employees, but specific also by shift leaders, lower in the organisations, more directly on the working floor. Goal is to improve the awareness bottom up in the organisation.

Targets /objectives are included in the X-matrix. As new goals will be defined this quarter for the next 12 months, evaluation of the goals set for past 12 months are evaluated within next weeks. Seen X matrix (Management review) results MT meeting of Q2 2022 2022-08-16 which includes review of HACCP system. (MR over Q3 and Q4 2021 and Q1 and Q2 2022). The quarterly performed management review is after the second quarter of the year combined with HACCP system verification which covers the required topics e.g. complaints, microbiology and pest management. Actions as result of the quarterly meetings are documented in a list as part of the MR/ per quarter review document.

Some production goals were set on hold (e.g. caused by the situation around Ukraine and high energy and raw material prices). Examples of goals which are e.g. achieved are re-introduction of SDP production and banish Listeria in the environment. Clear targets are set per department and results monitored and discussed on a weekly / periodical basis during management team meetings (Tier 2). On Listeria only incidental positive analyses were detected and complaints (target max 5/week) goal was achieved (av. YTD 3.8/wk)

Some goals were still ongoing as implementation of , digital environment for QA, to use e.g. for SSOP and Pre-SSOP and other registrations on site.

Also goals were set on introduction of new products and goals on optimizing the usage of areas which were released after transfer of activities deboning the bacons at the beginning of 2021 to Boxtel e.g. storage of bacon (FP, vacuum packed) in stead of storage those products at Seen that the organisation is working hard on achieving this goal as soon as possible. This goal is not only set because of cost reduction but will also achieve a big step in improvement on delivery reliability and quality (decrease complaints on delivery/labelling) and ownership (food safety culture).

The management team showed commitment to the quality management system (QMS) during the evaluation interviews as the site manager was present during day 2 and 3 opening and closing meeting including the assessment of the management part of the audit. Formal communication meetings (e.g. daily planning meeting per shift, weekly snapshot and periodical management team meeting) are held within

this organisation. Communication is also organised through white boards, TV-screens and the Vion App. Meeting with NVWA 1x 4 weeks. HACCP meeting 1x month, seen minutes 2022-07-04.

Currently the transition of the operation is still ongoing resulting is several ongoing changes in the organisational structure and production activities. Last change is ongoing on the storage of middles. In stead of at). Communication on responsibilities shows clear communication lines. The commitment is also evident in The systematic for continuous improvement (e.g. Multi Moment measurements, 5S, Tier 1 – 3 meetings). The company demonstrated an effective system.

Site has a list of all relevant legislation laid down in several protocols reflecting the legislations and required documentations of specific countries. No issues were observed during the audit that could be considered as non-compliant with legislative/regulatory requirements. This is kept up to date by QA of HQ Vion Boxtel.

The Senior Management provides enough resources for implementation and development of the FSMS. The site has a genuine, electronic version of the current Standard available and gets the newsletters from BRC Global Standards.

Defined minors from previous audit have been closed out and did not re-occur. No logo usage and BRC requirements present onsite.

1.2 Organisational 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 also announced. In the structure is described how responsible persons are deputised in case of absence. The organisational structure has been documented in P-SPZ-NL-10092 2022-06-09

In the chart all levels are defined for the departments. Site management team includes site manager, Operations manager, controller, QA manager, HR manager, manager facility and planning.
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 competition matrix and document training and development (incl deputies) P- SPZ- NL 10079. A key position list is created including arrangements in case of absence of the responsible staff (seen “vervangings matrix” P-SPZ- NL 10208 2022-05-17. All staff are aware of their responsibilities and have access to relevant procedures.

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

2 The Food Safety Plan – HACCP

The company's food safety control system is based on the Codex Alimentarius HACCP principles. The HACCP system is implemented and maintained and lead by Head Quarter procedures. The HACCP system has full management commitment and is an integral part of the company's Quality Management System (QMS). Multi-disciplinary HACCP-team (P-SPZ-NL-10144) consists of Site Manager (team leader), QA Manager, Manager Operations supported by Maintenance Manager, Manager F&A and HR Manager where necessary (Tier 2). Competent team of people working for many years in the meat processing industry P-Food 10013 2021-11-14.

Prerequisite program assessed. Setup of PRP program centrally by HQ Vion Boxtel within 'Procedure Prerequisite requirements and additional CCP's, CP's' (P-FOOD-1000). Local process control plan set-up per site (P-SPZ-NL-10067 2022-08-16). Production specification information used as input for the hazard identification / risk assessment. Due to the range of countries supplied to several protocols are available on management of requirements per country, closely guided by Dutch Authorities/NVWA officers.

Full product description including microbiological limits and shelf life is in place. The intended use of the product by the customer has been clearly defined and never is ready to eat. Product suitable for delivery B2B and consumption by general consumer groups but also vulnerable consumer groups. No claims made regarding food safety aspects. Documented within central 'Procedure Hazard analysis' (P-VION-10000)

Flow diagrams are prepared and available. Flow diagrams seen of all processes and annual verification of flow charts as reported in the combined HACCP-system verification / management review. Verification details of flowcharts are recorded in the document control system . Seen several examples of flowcharts like flowcharts e.g Inpak (packing) P-SPZ-10178 2021-09-30, Backs trim line P-SPZ-10033 2021-07-13, Gammon line P-SPZ-NL-10203 2021-09-30, Flowchart brine preparation P-SPZ-NL-10036 2018-08-08. No reworking or recycling identified. Freezing (packed in foil/boxes and vacuum or naked product), transport and cold storage (incl. metal detection) are partly done on site and partly subcontracted and outsourced processes, decided by HQ. Flowchart P-SPZ-NL 10186 cold storage/freezing, incomplete.

Flowcharts are well slit up to create more overview, however these were not always fully complete, some missing parts were identified: **Minor 1 on 2.6.1**

Hazard identification / risk assessment setup centrally by HQ Vion Boxtel. The HACCP plan includes a review of potential physical, chemical, radiological and microbiological hazards. Each identified hazard was reviewed and given a risk rating to define the severity and likeliness of a hazard occurring. The risks have been defined from the hazards (occurrence x severity) with the adoption a decision tree. Risk calculation based on 3 x 3 matrix which has to be adapted by the production locations like Vion Scherpenzeel BV. This generic risk assessment has to be adapted to the local processes and buildings.

In addition to incomplete flow-diagrams (Minor NC 2.6.1), also some steps were missing in the Hazard analyses freezing e.g. packing and loading steps and slicing/SDP e.g. slicing of cubes and using foil in between during packing **Minor 2 on 2.7.1**

No allergens on site (only raw materials are sugar, salt and preservatives in the curing department). FTS document is part of the on site assessment, First Time Right is discussed within multi-disciplinary team. Output FTR /risk assessment will lead to CCP, CP (PRP control measure) depending on the risk score.

The company has defined one Critical Control Point (CCP) relating to product safety and the scope of the BRC audit: Core temperature of the incoming pork meat (including returns) and the outgoing fresh meat .

Critical limits have been defined for this CCP on several places and are related to the legal temperature requirements for raw red meat and corporate engagements:

- CCP1A: Core temperature at reception of meat ≤ 7ºC (legal limit)
- CCP1B: Core temperature at reception of meat for raw materials transferred within Vion plants, ≤ 6ºC
- CCP1C: Core temperature at reception of meatpreparations ≤ 4ºC (leagal req.)
- CCP1D: Core temperature at reception of ms meat ≤ 2ºC (leagal req)
- CCP2A: Temperature loading of fresh meat: ≤ 7ºC
- CCP2B: Temperature of vac. Packed meat and meat products (incl. returns) ≤ 6ºC
-

When core temperature is between action limit and critical limit it is allowed to receive the batch but it must be quarantined (QA / management must be informed). Above the critical limit the batch actioning is obligate. Due to supply chain management, trailers with meat from sister companies are parked onsite and of loading of trailers is decided by planning. Records of CCP monitoring and verification show measurements are carried out by authorised persons as planned. The procedure for CCP 's identifies the corrective action to be taken when the limits are exceeded. Records are kept of adjustments made and any actions taken.

CP's (food safety control measures at PRP-level) identified amongst several others (36 in total) (Procesbeheersplan P-PSZ-NL 10067 2022-08-16):

- Product contamination (product own / foreign materials – slaughter /handling / lubricants / pest control / personal hygiene / etc.);
- Cross contamination with pathegenes via knife or machines/ equipment
- Control contamination with condensed water from cooling systems;
- Temperature control during processing (trimmings: < 6ºC);
- Hygiene recipients (crates, pallet boxes, etc.);
- Procurement of raw materials according to specification (incl. additives);
- Control product age (< 5 days after slaugter);
- Control printing shelf life date;
- Control dosage nitrite as preservative in brine injection (> 60-150 ppm ingoing product);
- Control vacuum packed products (visual inspection);
- Control prepration and injection brine solution (bacon); Control cooling down after smoking process (< 5h < 7ºC);
- Control temperature during transportation;
- Control metal contamination (knife integrity verifiation, metal detection);
- Control contamination of other foreign materials (X-ray);

- New: CP on exchange of nitrite free and brine with nitrite as new product is devellopped without nitrite

Each department has Pre-SSOP forms and SSOP forms to record findings and actions. Good management seen.

The HACCP system is verified through daily checks and daily verification of all forms, internal audits, check of all CCP's + CP's + PRP's during the yearly system verification. Report of HACCP Reassessment dd 2022-08-16 was assessed

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

The company has a quality manual which states the company's commitment to quality and food safety. The quality manual is the total of all quality documents: system procedures, working procedures, work instructions, registration forms. Furthermore, the VOS system is applied with MMM (multi moment measuring). IT-system used for document control (HR and VOS have its own document control management system). The quality manual is available on the computer for all key functions (password protected).

3.2 Document Control

Authorisation of documents based on system functionality. Some documents available in relevant languages as several employees of different origin are working for the company. All secured kin

3.3 Record completion and maintenance

Most records are handwritten, although a project on housekeeping and inspection currently with digital recordings. Also records from the weighing system to guide traceability. And records on external pest contractor and external lab are available in their applications. More and more digitalisation. Company uses lean drivers in excel sheets to record production efficiency (stops, changeovers, brake downs, etc). Records are archived for 5 years according to procedure. Maximum product shelf-life applied is 2 years. All electronic data are secured by daily back-ups, arranged by HQ.

3.4 Internal audits

Audit management by the Vion ' system. There is a schedule of internal audits in 2022, last version seen 202-03-14 against (documented) procedures, carried out by trained auditors (Vion auditor pool of QA Managers). There are 2 system audits (risk based). The production site and involved departments are audited both announced and unannounced by a central Internal auditor, who is independent and demonstrably trained, organised and scheduled by HQ. Beside two system internal audits, also other internal audits are planned and held as PT audits and TFS/TWA audits. In total > 4 internal audits/ calendar year. Beside this weekly small internal audits on internal VOS system. All chapters of the system are audited, the depth and transparency of follow up of audit results was improved after the minor NC on this topic of previous BRC audit. Internal audits carried out with relevant annexes to guide requirements on schemes (annex 3 on IFS PIA). Procedure 'interne audits' (P-VION-10011). Reports of internal audits reviewed e.g. 2022-06-15 PT audit, 2022-06-15 Internal TFS audits (hygiene and integrity), IA announced (incl. BRC fundamentals) and hygiene topics 2022-06-07/6 and report seen

on follow up of (internal major NC on the PT-audit) on 2022-09-13. Recording of findings reported on a central list. Also the conformity is reported. IA unannounced was planned for Q4 2022.

VOS system audits are performed on weekly basis and on daily basis the so called SSOP assessments are carried out in every production department (digital on tablet). These assessments are used to identify and solve any non-conformity related to hygiene and/or state of repair of processing equipment, processing / storage areas and buildings. Reviewed examples of SSOP's related to the vertical traceability test and during the audit days.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Risk identification / risk assessment related to raw materials setup centrally by HQ in Boxtel resulting in product specifications specifying relevant aspects to quality and food safety (CP). As the meat suppliers are all within the Vion company, all approved suppliers. In case of incidental other suppliers, these are low risk (fresh meat). Additives and seasoning is supplied by well known and fully certified approved suppliers. No high risk food suppliers identified for this organization. For packing material, Approval of suppliers based on GFSI-certification. All suppliers of packaging materials have to be approved by the central Vion office entered into the system (.) before they are allowed to deliver. Supplier questionnaires used too. Some additives from the brine delivered by trading companies. List suppliers' additives Vion Food NL (S-MMI-10190), List of approved transporters (S-MMI-10013) and 'List of approved cold stores in use by VION (S-MMI-10199), yearly demonstrably reviewed by Vion HQ. Reviewed for (vertical test). All ok.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The risk assessment depends on the kind of material according to procedure P-SPZ-NL-10030. Temperature control of incoming meat (pork middles, other pork meat) is CCP. Identification of IP-status of pork middles by means of coloured labelling (organic = green, farming star = orange, GB/GF/QS = blue). Also slaughterhouse specification by coloured labelling (determining further processing according to costumer specification). Verification of slaughter date and origin at reception of meat batches. Meat guiding documents are verified by the gate keeper and must be approved before trucks are unloaded. Document must show the official approval for export countries. Overview available showing which slaughterhouse is approved to supply meat for export countries. Ingredients and packaging materials are received at the dry warehouse in a separate building and undergo visual inspection. Seen supplier of foil as primary packaging OPI, BRC Packaging certified. Form in use to identify batches F-SPZ-NKL-10087. Reference procedure: P-Food-1025 Management of suppliers of raw material and packaging.

A documented intake of raw materials and packaging materials is available at the intake department all directly registered in the digital system. Main issues to check are temperature, damages of packing, volumes/amounts and batch codes. As soon as information is put in the system, the SSSC label is the output to place on the products. Usage of products (incl. raw materials, ingredients and packing materials) is performed by scanning the SSSC label. Order of intake is discussed. Products are stored according to requirements. Intake registration is verified during vertical test.

3.5.3 Management of suppliers of services

Reference procedure: P-Food-10032 18-11-2021 management of suppliers of services, managed by HQ. The approval was shown for all contracted services. Service suppliers (based on risk assessment) are evaluated yearly on site as input for the MR

Monitoring was shown for contracted services, formal agreements (including food safety and food defence aspects) samples taken, all ok:

- Pest control
- Laundry services
- Temperary employees
- Maintenance
- Transport and Distrifresh (controlled by Vion HQ Boxtel)
- Off site storage
- Laboratory testing
- Calibration
- Waste management
- Contracted Cleaning
- Catering services are not applicable.

3.5.4 Management of Out sourced processing

This is handled by HQ. Overview available of approved external cold stores specifying their legal approval (EU-number and scope) and applicable GFSI-certificates. Cold stores involved in freezing (both naked products and packed products) but also metal detection. GFSI-certification, IFS PIA and CoC-certification (Chain of Custody), required for cold stores. Based on the risk profile the cold stores are audited by Vion HQ periodically. Contracts refer to relevant Vion procedures

3.6 Specifications

Specifications of raw materials, packaging and finished product are based on items regarding to suitability for its purpose and (migration) tests/declarations. The specifications are authorised and controlled.

Vion HQ Boxtel is responsible for formal agreement of specifications. Specifications are reviewed internally to ensure they are correct and up to date. Finished product specifications kept up to date in MDM software (Master Data Management). Review every 3 years. Samples of specifications taken at this visit demonstrate control:

- Raw material /additives
- Packaging; specification incl. DOC 19-7-2021
- Lubrication: Lubricant; oil spray ncluding declaration on allergens) 2019
- Cleaning agent
- Raw material Art sliced neck in MDM anc spec in MDM dd 2020-03-28, Non GMO req. conform EU regulations 1829/2003 and 1830/2003
- Finished products:) Seasoned diced pork 2015-09-14, Slice belly Aged 3.5 mm 2022-09-14, Vion Klantenkaart art. Buik sht z/zw z/vng 2021-12-20 (F-NL-Food-10074 r5 2019-02-01)

Specifications of finished products are provided in two types: MDM and client specifications (managed by head office), not fully clear is which of those provides the key data to meet customer requirements (specific needed for production) and if these specifications are up to date /reviewed sufficient frequently (min. every 3 years). **Minor 3 on 3.6.4**

3.7 Corrective and preventive actions

Reference procedure: P-Food-10018 Corrective and preventive actions

Corrections and corrective actions incl. verification ir. seen. This can also be initialized from several sources. This procedure works effectively, this is verified during the audit for non-conformities identified by staff, through complaints, internal audits, third party audits etc.

Seen Excel overview via QA, including code for the cause and RCA if applicable (RCA is only applied under complaints/ NVWA / internal/external audits. Action list SPZ seen, followed actions NC of previous audit: all ok.

Corrective actions and preventive action system is not on all items up to date. The IFS PIA external audit actions, some of them were still open and some of already performed actions were not clearly defined in the overview. **Minor NC 4 on 3.7.1**

3.8 Control of non-conforming product

Reference procedure: P-SPZ-10176 14 June 2021 Blocking products and non-conforming products.

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

No Non-conforming products were seen on stock, only in the cold storage (frozen), demonstrably blocked and marked with a red/white chain incl block form. QA allowed to unblock/ release. An overall action list (action register) is used to follow actions from internal and hygiene audits. Corrective and preventive actions system on blocked / non conforming products is up to date. The handling of non-conforming products is according to requirements.

3.9 Traceability

Reference procedure: P-SPZ-NL-10013 Traceability

Traceability system operates through computer systen nd paperwork enables trace of raw materials and packaging from supplier through processes to packing and dispatch.

Planned 1 test a year. Tests performed: bottom up on foil 2021-10-01, on FP shoulders 2022-03-10, reports including mass balance, carried out within 4h. this was the upstream test. The top down on Rug zwoerd 2022-05-24. Beside their own tests also during all external audits (yearly performed by clients), trace tests are performed and reviewed, good control was seen.

During the audit a vertical trace was initiated by the auditor, traceability was tested on container loaded on 2022-06-14 for client # order no. `, 24024.5 kg (deponed shoulders, frozen in boxes). Fast tracing (forwards/backwards)<<4 h, including packaging was seen, records on paper and prints out of the system. Also related checks and controls during processing were available. Good control.

Seen product specifications of all raw materials and finished product, receipt records, food compliance certificate is verified. Fully traceable one-step-up and one-step-down the system, including packaging. In coming control checks, production checks, calibration and analyses were verified too. Time to perform the test was respected (<4h). Rework was not applicable for this product. During rework traceability is maintained as well via the systems (labelling/scanning etc.).

The company implemented a sufficient traceability system. There were no issues found during the product traceability and all documents showed control over the system for food safety by the organisation. Food contact materials legalization is fully implemented.

Conclusion: traceability system is working properly. Mass Balance is complete. Packaging is also traceable. Verified records of CCP's, CP's and PRP's.

3.10 Complaint-handling

Reference procedure: P-SPZ-NL-10008 Complaint-handling

A trend analysis is available as well as elaborate explanation in the MR. All complaints were settled adequately. Handling thereof was presented thought an excel document. All supplier complaints go back to the suppliers and feed back into the supplier approval. And are taken into the supplier audit when the company visits. Follow up demonstrable no issues. Very extended RCA, and trend analysis verified of the complaints.

Last MR over Q# 2021/2022-Q2:

In 2021 338 complaints were received. In 2022 YTD 178 complaints were received of which 13 on Foreign bodies, as most of the complaints are on delivery performances.

Segregation of serious complaints (food safety related complains, micro etc), overview was seen:

Seen Excel overview via QA, including code for the cause. Most complaints are on packing.

Main issues per product group;

- Foreign body
- Product quality / performance
- Other complaintys like labelling and ammount / transport

Followed customer complaint of 2022-05-30 on plastic ion a bacon products (RCA and follow up ok) and other complaints were seen like 2022-30 on a glove which was found on top of product and 2022-36 on curing period was not complied to (3 days), ok

3.11 Management of incidents, product withdrawal and product recall

Reference procedure: (P-VION-10015) Management of incidents, product withdrawal and product recall.

Recall and withdrawal procedures are including the activities, the list of contact persons and the replacement scheme, as well as a checklist, and overview of specialist to consult, and the national recall scheme from the authorities.

Scenarios are discussed in the manual regarding incidents. No withdrawals applicable since the last audit. Permanent contact person is always available in the organisation.

The recall notification letter NVWA has been included in the procedure, stating that the Certification Body will be informed within 3 days of the event of a recall.

Planned 1 test a year. Latest traceability / recall test seen 2021-10-01 Report including mass balance, carried out within carried out within 4h.

No recalls since last audit, 2022 YTD

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

NA	

4. Site standards

4.1 External standards

The site is completely closed and access to areas of production, packaging and storage is limited to authorized persons. Electric key control for personnel to gain access to the different departments is implemented. Also e.g. fences and cameras installed inside / outside. The company is always guiding the visitors while visiting the production areas. Security in 2 shifts on site including safety guards o. , control on movements/ camera system. Bulk storage tank for salt is fenced and locked. Raw materials and packaging materials warehouse are locked manually. Porter present at entrance point of trucks. Visitor reporting system implemented in the office building. Site entrance close to the office building is closed outside office hours (only entrance to the site after reporting at the porter's lodge or by intercom).

Staff is trained on the job and this is included in the training program. Meat processing company registered and officially approved by The Food and Consumer Product Safety Authority (NVWA) according to EU legislation. Official approval NL 82 EG. New risk analysis is made on food defence in P-SPZ-NL-10194 (procedure) and 1095 (analysis).

Seen the Food defence Proc P-SPZ-10195 2020-11-12, latest update verification plan (TACCP) P-SPZ-10194 2021-11-12. The Food Defence plan is suitable for the site. Challenge test (on fishing e mail) seen 2020-12-15.
IFS PIA certified by LRQA, last audit performed 2022-02-26

4.2 Site security and food defence

The site is completely closed and access to areas of production, packaging and storage is limited to authorized persons. Electric key control for personnel to gain access to the different departments is implemented. Also e.g. fences and cameras installed inside / outside. The company is always guiding the visitors while visiting the production areas. Security in 2 shifts on site including safety guards o on movements/ camera system. Bulk storage tank for salt is fenced and locked. Raw materials and packaging materials warehouse are locked manually. Porter present at entrance point of trucks. Visitor reporting system implemented in the office building. Site entrance close to the office building is closed outside office hours (only entrance to the site after reporting at the porter's lodge or by intercom).

IFS PIA and integrity training was held but not clear was if all employees were demonstrably trained in site security and food defence. **Minor 5 on 4.2.3**

Meat processing company registered and officially approved by The Food and Consumer Product Safety Authority (NVWA) according to EU legislation. Official approval NL 82 EG. New risk analysis is made on food defence in P-SPZ-NL-10194 (procedure) and 1095 (analysis).

Seen the Food defence Proc P-SPZ-10195 2020-11-12, latest update verification plan (TACCP) P-SPZ-10194 2021-11-12. The Food Defence plan is suitable for the site. Challenge test (on fishing e mail) seen 15-12-2020.

4.3 Layout, product flow and segregation

The lay out and flow of the processes is based on levels of contamination; manly open products – logic product flow – all low risk. Only fresh and vacuum packed products under scope. A lay out with flow of processes and movement of personnel is present, including zoning. Separate rooms are in place between raw material intake, production, packing and storage areas.

Beside enclosed product areas, low risk open product areas are applicable, defined with the decision tree in Appendix 1. Premises allows sufficient working space and capacity to work in a proper way.

Temporary constructions were noticed during this audit, but all well marked and clearly marked with red/white ribbons including measures were taken to avoid contamination risks.

There is a site plan for the plant, routing for employees, raw material, packing, rework, finished products, staff facilities and the removal of waste products is demonstrably stated. Latest version P-SPZ-NL-10159 21-09-2021

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

Suitable flow is implemented. In general a modern building fabric, well maintained through the years. Good facilities. Flat finished walls, in general suitable for processing and packaging activities. In the smoking area the environment is under control at the moment, walls and floors were repaired. However cumulating condense was seen on the ceilings and overheads of the salting/smoking area, alsol at the packing site. **Minor NC 6 on 4.4.10**. In general well maintained ceilings/constructions with a good access to suspended ceilings. Protected glass, no windows could be opened in the processing areas.

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

Suitable protected strip lights, including protected electric fly-killer devices.

No temporary fixtures have been noticed. Raw material intake and storage, production, packaging and storage are separate areas. There are no lines present that require equipment to extract dust. All staff has access to all departments via one entrance with brushes for shoes and hand disinfection connected to a gate. This is fully automated. Separate rooms are in place for raw material intake, storage of packaging materials and weigh up area and expedition. No dedicated production lines are applicable. There is one dedicated washing area present separated from production. No high-risk areas applicable only enclosed areas and low risk areas. Sufficient drain points. High level cleaning of ceilings and evaporators arranged including UV in airstreams. External doors are close-fitting. Lighting and windows are protected where they pose a risk to the product. In production areas all LED lightning is installed. Pre-SSOP inspections prior to production include checks on status of breakable items.

4.5 Utilities – water, ice, air and other gases

All utilities for water, cooling water and compressed air are covered by the maintenance system. Both water from the mains and well water (one source) are used. Water streams are mixed up, break tanks applied. Well water filter installed which is inspected every week as part of the maintenance program. Water used for brine is only from the mains (no well water applied). Well water quality is monitored as required by law (4x/y). A water distribution plan is available. Sampling tap points on a quarterly basis as indicated by procedure P-NLFOOD-10032.

Compressed air used for drying of equipment after cleaning. Food grade oil applied on predetermined risk related equipment including compressors. Maintenance of cooling equipment outsourced and overview on screens in maintenance office. Monitoring of the air compressors is also part of the maintenance program (water / oil separation, drying, etc.). Filters installed in the air supply and maintained although quality of the filter is not set by HACCP-team. Daily inspection of any oil leakage in the compressed air as part of the pre-SSOP inspections (CP). Also, inspection and maintenance (incl. cleaning and anti-fungal treatment of the evaporators) is a CP.

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. Use of well-known brands of equipment for food applications (e.g. slice line). New equipment is purchased as required and specified. Conveyor belts of the cutting department supplied with confirmation of approval for food use.

4.7 Maintenance

Maintenance is performed by own resources and some maintenance is outsourced. Maintenance management system based on IT system. If possible, any maintenance activities are clustered and executed every week on Saturday outside production hours. Communication to production and cleaning is done prior start-up in order to prevent contamination. Maintenance contractor instruction demonstrable, contractors sign for the external hygiene instruction. Greasing plan for food grade and non – food grade grease demonstrable (risk-based approach, frequency depends on type of equipment and usage).

No major breakdowns applicable in last 12 months on machinery that disturbed the delivery to customers, but a lot of work performed because of the re-organisation of the internal processes. Documented hygiene inspections on start-up are completed daily by shift leaders, Pre-SSOP checklists are used to record and confirm maintenance where necessary. Short lines were seen between production and maintenance.

Attention for a hygiene clearance to production before starting production full cleaning after maintenance activities is implemented. Recording of maintenance jobs goes through computerised system. When the site has new equipment, this is included on the maintenance schedules, this was checked for the recently new installed line, deboning line of shoulders and the smoking cabbins. Separate engineering workshop: no issue identified. Only entrance to the maintenance workshop using a badge. Only pre-organised maintenance suitcases are allowed to be used inside production and storage facilities.

Greasing plan for food grade and non – food grade grease demonstrable (risk based approach). A detailed overview of required maintenance and lubrication was shown. Effective plan and follow up. Lubrication with food grade oils (see element 3.6).

4.8 Staff facilities

Central suitable staff facilities for both own employees and temporary workers. The surface of storage facilities (staff lockers) is in line with the number of employees. Based upon a risk assessment all zones are “low risk areas”. Lockers available for private clothing and personal items. No storage of protective clothing in the lockers except for protective shoes. Central issue of protective clothing. Boot wash installed at the entrance to production facilities. Direct access to production facilities. Also personally issued body

protection (worn underneath the clean protective clothing) may be stored in the locker. Hygiene lock at the entrance of the production facilities. Toilets are located near the changing facilities. Closed smoking room in the canteen area. Catering provided to the personnel. Facilities created to store own food in canteen including fridges.

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

4.9.1 Chemical control

Within the company there is a place where the working stock for the external cleaning company is stored. Control over cleaning chemicals on site is demonstrated. MSDS available and specifications confirm suitability for use in food processing industries. Polish for knife sharpening has specification available. Different mechanisms are in place:

- glass: evidence seen of a glass breakage procedure. Also, a glass register which is checked as well as infrastructure everyday (Pre-SSOP) and quarterly.

- equipment: there is a check of the physical integrity of the equipment every day, before start-up.

- wood: the use is prohibited excepting at the smoking cabinets (beech wood chips).

4.9.2 Metal control

There is a strict site policy concerning metal control P-SPZ-NL-10023 Suitable knives were used (clicking back in holding system – safety issue). Knives are widely used in production, no cut off blades seen. Daily checks seen for knives and equipment on the SSOP's/daily checklists. Staples, paper clips and drawing pins are not used in open production areas.

Knife checks starts at sharpening department and ends there too. Knifes are issued to employees by numbered sets and changed every break for cleaning. Colour codes knifes in knife assembly baskets are in place and assessed was the sharpening and cleaning of the knifes in a special area with two sharpeners, two whetting machines and a dish washer with calibrated chemical dosing equipment and checks on rinsing water temperature (>82 °C). Integrity check of knives carried out. Knives which do not return every break are covered by daily (pre-) SSOP inspections. Inspections of cutting blades and needles carried out during breaks (e.g. SDP department). Breakage of injection needles in bacon processing department is considered very unlikely.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Quarterly glass audits are carried out, and missing or broken items are reported and directly linked to a maintenance task. Periodic verification of maintenance program. Daily verification of breakable items during pre-SSOP inspections. Procedure management of broken items complies with requirements. No glass complaints were recorded since years.

4.9.4 Products packed into glass or other brittle containers

Products are not packed into glass/brittle containers.

4.9.5 Wood

No wood is allowed in the production departments, except the wood chips for smoking bacon. These are stored and used separately.

4.9.6 Other physical contaminants

De-boxing of plastic bags of pepper is in special cabinets, no further unboxing. In-boxing of plastic bags in carton boxes is also in separated parts from production. Dedicated area for remain of packing material and dedicated equipment material to transport packing material to production. Special metal detectable pens in production areas. Pens used in open production areas are metal detectable

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

Metal detection (products), sieves (brine injector, water) and X-ray (sliced products) applied. Vision camera system not validated to remove foreign materials (control of quality aspects). Also during visual inspection at specific lines (for example SDP) foreign materials found are collected and evaluated. Both foreign bodies and product own materials (like bone residues due to improper cutting) are presented to supplier when necessary. Testing metal detection and X-ray detection using methods and samples compliant with commercial specification as verified during the audit During one of the audit days a mall function of the Xray (slicing) was seen, not clear was if the corrective action was fully clear completed: Not fully clear was if isolation/ quarantining and/ or re-inspection of the products checked and produced since last successful test was considered/ needed. **Minor NC 7 on 4.10.1.3**

4.10.2 Filters and sieves

Filters used to control the hygiene of the brine to prevent any obstruction of the injection needles (with the risk of insufficient injection at certain areas of the meat pieces). Cleaning and inspection as part of the cleaning program executed by external agency. Assembling of the micro-sieve of the injection equipment by the team leader after hygiene inspection as recorded on the pre-SSOP-list as reviewed during the audit. Well water filter installed is inspected every week as part of the maintenance program.

4.10.3 Metal detectors and X-ray equipment

Detection equipment installed as result of the risk analysis and are not controlled as CCP's.

But the checks which are determined, are including critical limits, all checked beginning/end of the day and between breaks;

Metal detectors installed at:

- Packing line 5,0 mm Fe + 6,0 mm non-Fe + 6,35 mm SS (check start-up, every 3 hours and end of production);
- Salting process 1 and 2: 5,0 mm Fe + 6,0 mm non-Fe + 7,94 mm SS (check start-up, every 3 hours and end of production);
- SDP / slice lines: 3,5 mm Fe + 3,0 mm non-Fe + 4,5 mm SS (check start-up, every 3 hours and end of production);

Also metal detection applied by contractor (frozen storage). Metal detector functioning is checked using certified sample sticks. Both belt stop systems with noise and/or light and/or rejection devices used

Metal detectors installed at:

- Packing line JK / VM12 / VM14 / trimmings / smoking process: 5,0 mm Fe + 6,0 mm non-Fe + 6,35 mm SS (check start-up, every 3 hours and end of production);
- Salting process 1 and 2: 5,0 mm Fe + 6,0 mm non-Fe + 7,94 mm SS (check start-up, every 3 hours and end of production);
- Spare-rib process line: 3,5 mm Fe + 4,5 mm non-Fe + 6,00 mm SS (check start-up, every 3 hours and end of production);
- SDP / slice lines: 3,5 mm Fe + 3,0 mm non-Fe + 4,5 mm SS (check start-up, every 3 hours and end of production);

Also metal detection applied by contractor (frozen storage). Metal detector functioning is checked using certified sample sticks. Both belt stop systems with noise and/or light and/or rejection devices used depending on the packaging size. Procedure metal detection documented (P-SPZ-NL-10052) on registration form F-SPZ-NL-10072.

X-ray systems installed at the same SDP packing line (incl. rejection valve system). Verification of proper functioning of the equipment by testing samples at start-up, every 3 hours and at the end of production:

- 2,381 mm glass;
- 2,381 mm ceramic;
- 1,00 mm metal.

Verification of proper functioning of recently installed X-ray system using specified sample sizes. Test strips contain different sample sizes. Therefore, the X-ray detector has to detect at least 4 objects on each strip (which is equal to the minimum samples specified below):

- 0,8 mm SS 316 ball;
- 0,4 mm SS 316 wire;
- 2,0 mm glass;
- 2,0 mm ceramic.

This verification is on client request, not identified as a CCP.

During this on-site audit, was identified that the procedure for operation and testing the X-ray equipment was not fully clear described and implemented:
-The check on using the right program and belt speed (with the right/ effective sensitivity) was not clear included.
-The procedure did not specify to test the ejection mechanisms on its effectiveness.
-The usage of typical test pieces was not included in the procedure (although communicated via email before production)
-no specific procedure in case of mall function /usage of wrong program of the equipment of X-ray/metal detection (in separate procedure is described how to handle non-conforming products/ corrective actions in general). **Minor NC 8 on 4.10.3.4**
Luckily all products are demonstrably metal detected again after packing and freezing, before loading.

Corrective actions are clearly defined according to the overview. Data of the metal detectors is available in the documentation. E.g. the sensibility of the detector is clear. Automatic rejecting device/belt stop/alarm light does not always work correct: see Minor Nc 8

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 packaging in glass jars, cans and other rigid containers.

4.11 Housekeeping and hygiene

Cleaning mainly by / own staff according to schedules with frequencies and applied agents and procedures and cleaning schedule update 16 Nov 2021. During the audit in some areas/ equipment was seen in less hygienic conditions: **Minor NC 9 on 4.11.1**

Periodic cleaning schedule: check on performance via pre-SSOP and logbook of 2022. Cleaning is done as common in the branch: dry cleaning, flushing, foaming, (this includes disinfection), flushing. This is done on a daily base and covers equipment, plant, buildings and services (with daily / weekly / monthly cleaning frequencies). Low frequent cleaning schedule (ceilings, walls above 2,5m, evaporators) assessed also. These detail the chemicals to use, precautions to take and method of cleaning. A list of cleaning chemicals is in place and calibration on dosing unit is executed. Daily end of production checklists/before start up, are recorded to communicate with and production incl. performed/requested corrective actions. An internal facility team supports handling of waste and staff facilities (detergent, gloves, paper towels). However the cleaning of the dry storage/equipment dry storage was not included in the procedures **Minor NC 10 on 4.11.2**

Seen records of cleaning Pre-SSOP's 2022-09-12 /13/14 and during vertical test for the processing. Daily start-up checks with visual inspections are carried out. Results were (conform Mr) not excellent, this way projects to improve were implemented, showing now in general, good results.

Inspection: corrective actions seen cleaning activities 23 nov.2021 daily list to of non-conformities: to correct and verification by employees next morning, Good control was seen.

Hygiene checks of materials is performed 2 x 3 months, knifes/ metal gloves, measure equipment, cleaning utensils, cleaning of hands checks (1 x Q) on VRBG agar, compressed air 2 x year. Performance and results were verified, ok

Emballage which was cleaned is also verified (min 2 x Q), ok

Cleaning chemicals documents seen e.g. seen in document of , all Food grade.

Overview cleaning agents and objects 2022 including what has been done by Vion and what by seen.

CIP is not applicable, brine tanks are only rinsed, but manual started and observed. Residue tests washed crates on daily basis recorded in SSOP of the internal service department pH 6-8.

4.11.7 Cleaning in place (CIP)

CIP is not applicable.

4.11.8 Environmental monitoring

Environmental swabbing (Listeria) and Rodac (TPC) programmes are implemented.
Analyses on Listeria are done by an accredited Agar, swabs and residual tests are performed weekly as indicated by the risk-based environment monitoring program. Results and trends are plotted in the management review. Actions are taken, short lines in follow up and control were seen. Seen results of listeria swapping 1x 3 weeks per department 2022-08-29 and 2022-08-08 (whole factory 1x quarter)

4.12 Waste

Good control was seen over the collection and disposal of waste. Dispatch of category 2/VO853 and category 3/VO853 materials to authorized processing companies). Other by-product (like bones) supplied to authorized processing companies for human consumption . Other waste stored on-site and collected separately by

4.13 Management of surplus food and products for animal feed

Category 2 + category 3 material declared unfit for human consumption, retrieved by which is specialised in the destruction of this type of animal by-products. Trade documents according to Regulation 1069/2009/EC. A register is kept, and legal requirements are met, e.g. separate refrigerated storage and clear identification.

4.14 Pest management

Pest control is contracted to

The company has a contract with an external pest control service provider SLA 2016-03-24

Contract date 11-12-2019 for 2020-2022 (all Vion sites overall SLA) is available (1 times a year in-dept inspections). Site map is available. Last visit: 2022-09-12 Actions are taken and described in the action reports. Once a year pest control survey is performed, verified report of 2021-11-17.

Specifications of products / MSDS sheets are available online through the digital pest control system of the pest controller. Diploma EVM of the pest controller available and valid till 2022-12-05. Baits used are non-toxic, toxic baits are only used in case of infestation. Bait stations are robust, made up of plastic material, secured in place and appropriately located to prevent contamination risk to product. Dry storage needs its attention. During the site inspection no serious problems with pests were detected.

Staff , have been trained to identify potential pest activity 2021-03-25.

Trend analysis during management review. Layout (with location of bait stations and monitoring stations is available, no structural problems.

4.15 Storage facilities

At the production facility limited cold storage is available. Temperatures control system implemented (frozen and cooled) including temperature alarm settings ( )ked to contractor alarm desk forwarding alarms to Vion officers when necessary. No storage under controlled atmosphere applicable. External contracted storage is applied for almost all goods. All transported at appropriate temperature (< 7ºC for fresh and when it is frozen to below -18ºC conform to legislative requirements).

A separate building is applied for the storage of packaging and other raw materials. No return of partly used packaging materials to this warehouse. No outside storage, except for dirty crates. Warehouse / cold store contractors are approved. In a separate part of the production facility, the packaging is unpacked so packing material not transported into production areas (like foils and strips).

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.

4.16 Dispatch and transport

Dispatch and release of products is based on temperature verification (CCP). Transport mainly subcontracted to DistriFresh, a Vion transport company, which is BRC Storage & Distribution certified. Other approved logistic partners are listed. Contracts managed by the logistic / supply chain department at the corporate VION organisation covering the requirements of the BRC Food standard related to transport. Transport is organised and scheduled by the Service desk. They are only using approved transport and storage contractors. Trucks and reefer containers are inspected for hygiene and temperature before loading. Results of this inspection are recorded at the CP control forms. Trailers may be pre-loaded and parked on the Vion Scherpenzeel site area. Remote monitoring of cooling equipment by logistic contractor DistriFresh. Internal transport is performed with electric hand trucks, cleaned and remained on basic level.

Transport: all outsourced. Companies certified against applicable standards (BRC and / or IFS) see 3.5.3.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
4.9.4	Products are not packed into glass/brittle containers.
4.10.4	No magnets are used into the process.
4.10.5	No optical sorting equipment is in use.

4.11.7	CIP is not applicable.

5. Product control

5.1 Product design/development

Reference procedure: P-NL-Food-10190 Product design and development

Product development is normally not applicable except for changes in existing products and introduction of new packaging methods. Past year, new types of salted products were introduced. In all relevant cases when the company changes anything or introduces new methods this is described in detail in a validation reports which were verified. Factory trials and validation from such trials are documented, demonstrably included in the quarter reviews. Shelf life verification and evaluation details have been verified.

5.2 Product labelling

Labelling according to legal aspects as required by the company, several checks done during production tour. Raw materials are special labelled in the racks and on the individual product bags. Shown were good results for the product of the vertical traceability test.

Verification of shelf life date recorded on labelling controlled as CP. No full automatic labelling of packed product installed. Slicing is packed for of consumer products this line is automated with automatic labelling and verification procedure applied, rest is B2B. Pre-printed labels used, up to 6 different types. Product labels are printed based on article numbers and have to be printed per packed unit. No functional product claims made. No allergens identified on-site. Labelling according to legal aspects as required by the company, several checks done during production tour. Raw materials are special labelled in the racks and on the individual product bags. Shown were good results for the product of the vertical traceability test.

Labelling product for EU-market following EU-legislation and any additional customer requirement. Following Vion central procedure labelling for markets outside EU approved by sales (HQ Vion) after evaluation by the customer. In storage no none-labelled goods allowed.

No cooking instructions applicable.

5.3 Management of allergens

No allergens on-site.

5.4 Product authenticity, claims and chain of custody

Vulnerability assessment based on central ‘procedure product and process integrity’ (P-FOOD-10049) and complies with IFS PIA certification, GGN4056186517845. Local assessment must be carried out on the

basis of this procedure and is translated in Procedure 'Risicomanagement-beheersplan Product-procesintegriteit derde landen" P-SPZ-NL-10174 with high risk appraisal. Also listing of countries to supply to is available in F-SPZ-NL-10095. Basically, the local vulnerability assessment is based on the evaluation of raw material characteristics, supplier evaluation and logistic services. Raw material risks are considered low as products can be easily recognised as pork meat parts. Product mainly supplied by Vion sister companies. Procurement of meat parts from external companies and external logistic services (especially when products are unpacked, e.g. freezing) are considered high risks. Audit program implemented for logistic service providers depending on the company risk profile. Logistic service providers have to be GFSI-certified and CoC-certified as well. Segregation and correct identification is established for several animal welfare categories (so called quality lines):

- Organic pork (SKAL certified): identification by green label, last number of article number = 7 not in production at the time of the audit;
- Farming star ("beter leven"): identification by orange label, last number of article number = 5;
- GB (good farming including welfare requirements for UK clients): identification by blue label, last number of article number = 6;
- GF (IKB certified): identification by blue label, last number of article number = 3;
- QS (Qualität und Sicherheit for German market): identification by blue label, last number of article number = 4 or 8.

Certification of GF, GB by certification bodies IFS PIA by LRQA. All products are produced based on EG 82 NL approval number, incl. regular meat (called ST "standard"). Risk assessment and execution of mass balance exercises are scheme requirements. Daily verification of mass balance FS at process level is accepted by the certification body (FS scheme requires full daily mass balance test). Mass balances are made on a daily basis for all quality lines. During the audit it is checked how the status of quality lines is verified and segregated at the intake department and several production departments (cutting / deboning, DMM, SDP, etc.) like the labelling of meat hooks, the identification of product lines, the production sequence (starting with high quality lines followed by lower quality lines), colour coding of recipients (coloured liners) to prevent exchange of meat categorised in different quality lines.

Procedures are implemented concerning the verification of the quality line and how to downgrade the quality lines as generally the demand of certain quality lines is lower than the availability of meat categorized in higher quality lines. Downgrading quality lines is the responsibility of trained and qualified personnel. The downgrading is allowed following the sequence: FS -> GB -> GF -> QS -> ST. BIO-> GB.

Vulnerability assessment for non-meat raw materials covered by the procedures and risk calculation based on a few factors like product characteristics, packaging materials, origin, product availability. No high-risk raw materials identified.

- Also countries of destination can have their own requirements (like USA / Canada, Korea, Japan, China). Dutch authorities (NVWA) issue health certificates on batch level following third countries export protocols

5.5 Product packaging

A system of coloured jumbo bin liners is in use for some clients / products (purple for Japan, orange for FS). For others mostly blue liners are used. Packaging materials are unpacked in a separate cell next to

production are (re-)stored separately from production materials. Partly used packaging is covered prior to returning to the storage area. Partly unpacked does not return to the second building. Packaging materials have to comply with Regulation 1935/2004/EC (specification review / approval process) and 10/2011. Foils assessed during the tracetest (products from '

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Product monitoring based on Regulation 2073/2005/EU and interpretation guideline ('Infoblad 85' issued by the Dutch authorities NVWA) laid down in procedure P-FOOD-10008 (from 13-02-2017). Both food safety criteria and process hygiene criteria set by legislation are translated to the monitoring program as reviewed based on sampling.

Listeria positive swabs found during monitoring of production areas (internal requirement). All products produced by Vion Scherpenzeel BV have to be fully heated prior to consumption. Comprehensive action plan on cleaning is observed.

Mechanically separated meat type 3/type 4 (according to Regulation 853/2004/EU) to be used for meat product must be heated prior to consumption.

A microbiological monitoring program: bacon (TPC, entero's, Salmonella, Listeria), SDP (TPC, E. Coli, Salmonella, Listeria), DMM (TPC, E. Coli, S. aureus, Salmonella, Listeria) and shelf life testing program is in place. Results are analysed and reported ( ). Results of 2021 and 2022 YTD demonstrate compliance with the defined specifications. Results are part of each quarterly MR and shared with MT. Each month a comprehensive report is created also to be presented to authorities.

Physical / chemical product monitoring as part of process control, for example meat part size and fat content for SDP.

5.6.2 Laboratory testing

Reference procedure: Product sampling and assurance & Contamination control Procedure P-FOOD-10008

The company has a full updated product sampling and assurance program available to verify that products are in accordance with buying specifications and legal requirements. CoA's are supplied by the suppliers. The QA reviews these results and if they are approved. The products are all low risk and the suppliers are GFSI certified.

Analyses are done on both products and surfaces in relation to cleaning. Clear overviews are available. In the quarter reviews/ management review, an overview is taken as well.

No laboratory present on the site.

External analysis via ISO 17025 accredited.

Verified several analyses performed throughout the year following the microi analyses planning. Shelf life is determined. Annual CoA from suppliers. The products are all low risk and the suppliers are certified and most of them also supplier belonging to the Vion orgnisation.

Seen Micro results overview in Q review Q2 2022 (MR) on Listeria and Salmonella, in control. Seen results. Seen results on trace test: of e.g. shoulders 2022-05-19 on TPC, List, Salm, E coli, all ok, Health certific\te for export on container (MN34401-264-1 2022-05-19) was ok and signed by authorithy NVWA. Seen agar results wk 34, wk 31, all ok. Seen hand hyg checks (4x year) of 2022-08-18, ok and seen results of received RM fresh meat 2022-09-01 Loin ribs pool sample, ok.

5.7 Product release

Finished product is fit for delivery unless it is in blockade, these products are released after the QA department.

5.8 Pet Food

The site does not produce pet food.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.3	No allergens on-site.
5.8	The site does not produce pet food.

6. Process control

6.1 Control of operations

The site demonstrated a good control of operations. Process conditions and methods are well looked at and revalidated. Systematic monitoring is demonstrated. Maintenance of the cold chain is of prime importance including prevention of condensation. Continuous real-time temperature-recording equipment, linked to an automatic alarm system is in place. Alarms are set according HACCP team instructions and the maintenance service is notified of any alarm. The system is tested regularly. All processes are validated with records maintained, to demonstrate that the process is capable of producing safe, legal and quality products. Process control is based upon the HACCP study, legal and customer requirements. Documented start up checks (pre-SSOP) are applied. Multi moment measurement (MMM) system according Lean management is implemented. Team leaders take a predefined number of samples during their shift and compare the processed product to reference pictures to verify compliance to customer or internal specifications. Results are reported on white boards. In case of scores exceeding predefined limits containment actions and where necessary corrective actions have to be taken. Communication structure at different levels. Daily tier 1 production meeting covering quality performance.

6.2 Labelling and pack control

Packing takes place in line with production planning and customer requirements. Tests of product labelling, traceability code and shelf life carried out in accordance with specifications. Also consumer packing ((B to B), a system is developed with controls and instructions. Several types of products are identified, and pre-printed labels applied. Packs are labelled with more than one label per pack on customer request.

Label checks are implemented per batch. Records checked on the audit days and in the vertical audit. There are labels on fresh meat in primary packaging as vacuum foils and bags and there are labels on packed, slices, salted or seasoned meat. Also labelling applies on boxes, creates and other secondary packaging.

Product changeover is witnessed during the audit and sufficient controls to prevent mislabeling are in place (Packing line ribs). System generates automatic new labels after input was given on new type of product on the line, good control. Procedure P-SPZ-NIL 10197 2020-12-07

6.3 Quantity, weight, volume and number control

The company has implemented a quantity control system. All products are sold by weight. controls the balances for commercial purpose. Calibration of the scales is demonstrable, tarres are implemented. Consumer packing are all weight, minimum weight is applicable. The devices are tested internally by means of standard weights. Weighing equipment is calibrated 1x/y and tested daily in Pre-SSOP. Checks are performed at start and at the end of the run. Records checked on the audit days and in the vertical audit, ok. The scales for intake and dispatch are connected to the computer system.

6.4 Calibration and control of measuring and monitoring devices

Calibration procedures (with use of maintenance software) ensure relevant equipment is identified and regularly calibrated. Calibration is planned both by QC and maintenance following an overview op equipment. Critical measuring equipment are thermometers (hand held and PT 100/ PT1000 in refrigerators and smoking cabins). Internal calibration with 2-monthly frequency (thermometers CCP), 6-monthly frequency (thermometers CP) and yearly frequency (PT 100/PT1000) or external calibration with yearly frequency (X-ray. Metal detectors, weighing scales, reference thermometer '25') is adequate according to the calibration records. Several calibration reports seen. Calibration of the chemical dosing systems used for cleaning equipment is managed by the cleaning company

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

7. Personnel

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

There is evidence of introduction training for new starters, temporary workers (by and both in-house) and contractors. All new personnel have to watch a video on rules and instructions and pass an exam. Refresher training is carried out and documented within 'logboek intake'. Especially for workers from e.g. Poland, Slovakia, Romania, Hungary a translation of the hygiene and HACCP/CCP instruction is present in their own language.

For CCP monitoring relevant training is performed per CCP. Records on verification of knowledge by QA on relevant personnel per CCP. General trainings are performed digital, but process related trainings and working instruction are mostly trained oral by the management/ QC. Evidence of training, trainers and performance is available and was seen.
Training on Food defence was not always demonstrable (see **Minor 5 on 4.2.3**)

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

The standards for personal hygiene, dress code, medicines, jewellery and medical screening have been defined and communicated to all personnel (including temporary personnel, visitors and contractors) prior to commencing work. Compliance is checked during the internal audits and daily inspections by production supervisor and QA. These hygiene rules are enforced. Hand-washing facilities are available in the staff facilities and at the transfer point from staff facilities to production. A hand disinfection station has been installed. A sole brush is installed at the entrance to production. Blue coloured, metalized plasters are in use together with gloves, plasters are tested for each batch (seen #S018024626 2021-04-28 still in use). The wearing of any jewellery is not allowed. Policy on phones is under construction.

7.3 Medical screening

Visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Medical screening of internal / external employees implemented. Procedures are established for personnel to notify management of infectious conditions they may be suffering from or been in contact with. The site makes all visitors, new starters and contractors aware of the need to report infectious disease during the intake by the porter before entering the site. In case of a disease the company is consulting a specialised company doctor. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

7.4 Protective clothing: employees or visitors to production areas

Company issued protective clothing (inclusive work shoes) is given to all staff and visitors. Visitors get hairnet, Astro cap, head cap, coat, trousers, shoes. The laundering of protective clothing is outsourced to a contracted and specialised laundry . The wearing of sleeves, aprons and work coats isn't allowed during breaks, eating, smoking and using the toilets. White protective shoes are worn and washed by sole washer (before entering production) and by manual cleaning (after leaving production). Disposable hair nets, beard snoods and astro-caps are in use. Cleaning facilities are provided. Knifes and metal gloves are washed internally following a manual cleaning procedure incl. disinfection.

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

8. 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 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 - Traded Products

9.1 Approval and performance monitoring of manufacturers/packers of traded food products

All packed and labelled products received to be frozen and stored before dispatch are produced at Vion own production location, most of the products are produced in Boxtel (packed cut chilled meat products, directly from the deboning area of the slaughterhouse in Boxtel (Netherlands). The Vion Boxtel company is an approved GFSI certified supplier (as all Vion production sites are GFSI approved).

All handlings of products on the cold store area are performed under direct supervision of the NVWA employee, always on-site during reception and dispatch of goods (they have to approve and sign for the specific forms to approve the requirements for export).

Records of reception of goods are maintained, including the check on approved manufacturer's processes. Internal audits are conducted by HQ Vion including traceably checks, audit reports are verified, certificates confirming the product safety status of the manufacturing and packing sites supplying the products which are traded.

The complaint procedure is applicable for these supplied products, but no complaints were recorded.

Product testing is performed by the producers Vion Boxtel, in case needed analytical reports can be added to the product forms and official papers before dispatch.

The countries of destination can have their own requirements (like USA / Canada, Korea, Japan, China). Dutch authorities (NVWA) issues health certificates on batch level following third countries export protocols.

9.2 Specifications

The specifications are authorised and controlled.

Vion HQ Boxtel is responsible for formal agreement of specifications. Specifications are reviewed internally to ensure they are correct and up to date. Finished product specifications kept up to date in MDM software (Master Data Management). Review every 3 years.

If applicable customer-specified requirements are met.

9.3 Product inspection and laboratory testing

As the products are bought from Vion production sites only, label check and logistic forms are checked during receiving products.

Metal detection is performed after freezing the products (frozen storage), before loading containers. Metal detector functioning is checked using certified sample sticks. Both belt stop systems with and light and/or rejection devices used depending on the packaging size. Procedure metal detection documented (P-SPZ-NL-

10052) on registration form F-SPZ-NL-10072. (Fe2.5 mm, NFe 3.5 mm and SS 3.5 mm) Good registration and performance was seen.

No laboratory testing by Vion Scherpenzeel. If analyses are required by the country of destination, or the customer, analyses are conducted and approved by the producer (e.g.Vion Boxtel), proof is available at the office, making up the official documents for dispatch

9.4 Product legality

The legality checked at reception by checking the label information, compliance with relevant legal compositional requirements including quantity/ volume of the batch.

9.5 Traceability

Reference procedure: P-SPZ-NL-10013 Traceability

Trace test was performed specially focused on the cold store/ trading part on annual basis

Last test was conducted during a audit, the trace test was successfully conducted < 4h on 2022-07-27, back to the last manufacturer and forward.

During the audit a vertical trace was initiated by the auditor, traceability was tested on container loaded on 2022-06-14 for client order no. 24024.5 kg (deponed shoulders, frozen in boxes). Fast tracing (forwards/backwards) <4 h, including packaging was seen, records on paper and prints out of the system. Also related checks and controls during processing were available. Good control.

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

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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
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11.6 Training
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Module 13 FSMA Preventive Controls Preparedness Module Version 2 July 2018			
Clause	Module item	Conforms Y/N	Comments
13.1.1	Handwashing areas, dressing and locker rooms, and toilet rooms must have adequate lighting.		
13.1.2	Water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.		
13.1.3	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact.		
13.1.4	Ice used in contact with food must be manufactured in accordance with Good		

	Manufacturing Practice (GMP) requirements of 21 CFR 117.		
13.1.5	Where defect action levels (DAL) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot.		
13.1.6	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: • Economic adulterants which affect food safety • Environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • Radiological hazards • Unintentional adulterants which affect food safety		

13.1.7	All identified known or reasonably foreseeable hazards must be evaluated to determine “hazards requiring a preventive control” (i.e., significant hazards).		
13.1.8	Establish one or more preventive control(s) for each identified “hazard requiring a preventive control” (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.		
13.1.9	Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following: • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify recall is carried out		

	• Appropriate disposal (i.e., destroy, divert, repurpose) of recalled product		
13.1.10	Establish monitoring activities and a written procedure for each preventive control consistent with the requirements of BRCGS section 2.10.		
13.1.11	Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRCGS sections 2.11 and 3.7. Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).		
13.1.12	Validate all established process controls prior to implementation of the food safety plan, upon changes requiring re-validation or within 90 calendar days of the first food production. Validate allergen, sanitation and supply-chain controls as appropriate to the		

	nature of the hazard, control and facility.		
13.1.13	The PCQI (or authorized designee) reviews monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification. The PCQI (or authorized designee) reviews verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record is created.		
13.1.14	Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Sampling procedure to include method, quantity, frequency, and number of samples • Analytical method • Laboratory conducting analysis • Corrective action procedure		

	where pathogen is detected		
13.1.15	Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Adequate number and location of sample sites • Timing and frequency of sampling • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected		
13.1.16	Devices used to verify preventive controls must be calibrated.		
13.1.17	Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training and qualification via job experience.		

13.1.18	All records required by 21 CFR § 117 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable		
13.1.19	The owner, operator or agent in charge of facility must sign and date the written food safety plan initially and then upon any changes following reanalysis.		
13.1.20	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food safety plan, which must remain onsite.		

13.1.21	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified AND the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.		
13.1.22	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.		
13.1.23	One or more supplier verification activities (defined in § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients AND periodically thereafter at an adequate frequency.		
13.2.1	Human food by-products held for distribution as animal		

	food must be held under conditions that will protect against contamination, including the following: - During holding, human food by-products for use as animal food must be accurately identified. * Labeling that identifies the product by the common or usual name must be affixed to or accompany the human food by-products for use as animal food when distributed. * Shipping containers (e.g., totes, drums, and tubs) and bulk vehicles used to distribute human food by-products for use as animal food must be examined prior to use to protect against the contamination of animal food from the container or vehicle when the facility is responsible for transporting the human food by-products for use as animal food itself or arranges with a third party to transport the human food by-products for use as animal food.		
13.3.1	A Qualified Individual (QI) is responsible for developing the site's food defense plan,		

	conducting a vulnerability assessment, identifying mitigation strategies, and conducting a reanalysis of the plan. The QI responsible for developing the food defense plan shall be identified on the site's organizational chart. One or more QI's shall be responsible for implementing mitigation strategies at actionable process steps.		
13.3.2	The site shall have a written food defense plan, which includes the following: • A vulnerability assessment identifying significant vulnerabilities and actionable process steps • Mitigation strategies appropriate to reduce the vulnerability • Procedures for food defense monitoring, corrective action and verification		
13.3.3	A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates the following key criteria (at a minimum): • Scale and severity of		

	threat if a contaminant is added to product • Degree of physical access to the product • Ability of an attacker to successfully contaminate product—including consideration of an inside attacker A vulnerability assessment shall be documented for each food type regardless of the outcome and provide justification as to why each point, step or procedure in the operation was or was not identified as an actionable process step.		
13.3.4	Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment. Justification shall be documented explaining how the strategy significantly minimizes		

	or prevents the vulnerability.		
13.3.5	Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies. Procedures shall include recordkeeping requirements for all monitoring activities.		
13.3.6	Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria: • Method for identifying and correcting a lack of implementation • Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions		
13.3.7	Written verification procedures shall be established and implemented to ensure that food defense monitoring and corrective action are performed according to procedures. Verification procedures shall		

	describe activities to verify implementation of mitigation strategies. Verification procedures shall include: • A review of monitoring and corrective action records within an appropriate timeframe (e.g., 7 days) • Other verification activities as appropriate (e.g., internal audit) • Method for verifying that reanalysis of the food defense plan was conducted • Frequency for verification activities • Recordkeeping requirements of all verification activities		
13.3.8	Reanalysis of the food defense plan shall be documented and performed every three years or whenever • A change in facility operations which creates a new significant vulnerability • Knowledge about a new threat		

	applicable to the food or facility becomes known • Mitigation strategies are not implemented as intended • FDA requires reanalysis based on new threats or scientific evidence		
13.3.9	All records required by 21 CFR § 121 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable		
13.3.10	The owner, operator or agent in charge of facility must sign and date the written food defense plan initially and then upon any changes following reanalysis.		
13.3.11	All documents and records relating to the		

	food defense plan (i.e., all records required by 21 CFR § 121) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food defense plan, which must remain onsite.		
13.4.1	Vehicles and transportation equipment must be maintained and stored in a sanitary condition appropriate for the intended use to prevent food from becoming unsafe during transportation. Where inspection reveals that vehicles or containers are not in a clean condition, they shall not be used. A documented procedure shall describe cleaning and storage practices of all vehicles and transportation equipment maintained by the site whether leased or owned and as appropriate for the intended use. The procedures shall be fully implemented. Cleaning activities shall be recorded.		
13.4.2	The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their		

	responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver, it shall ensure compliance with the rule. Responsibilities shall ensure transportation operations are conducted in a manner to prevent food from becoming unsafe during transport (i.e., apply controls) and that responsibility for compliance with the regulation is assigned to competent supervisory personnel.		
13.4.3	Where the site arranges transportation, it shall document sanitary design requirements and cleaning procedures of vehicles appropriate for the type of food to be transported. These requirements shall be communicated to the loader and carrier. Where the site does not arrange transportation, the above provision shall be documented in the shipping service contract to ensure the shipper documents sanitary specifications of vehicles for the loader and carrier,		

	which are appropriate for the type of food.		
13.4.4	Contracts with loaders shall specify that the loader is responsible for following sanitary specifications provided by shipper.		
13.4.5	Where the site receives temperature controlled product immediately following transportation, it shall conduct an assessment to determine whether the food was subject to temperature abuse.		
13.4.6	Contracts with carriers shall specify that the carrier is responsible for the following sanitary activities where agreed to in writing with shipper. • Sanitary condition of vehicles and transportation equipment • Following shipper's sanitary specifications (including pre-cooling requirements where applicable) • Recording compliance with operating temperature where critical to food safety • Procedures for the use of bulk vehicles, which includes		

	recording the previous cargo and most recent cleaning for the shipper		
13.4.7	Contracts with carriers shall specify that the carrier implements a training program for all personnel engaged in transportation activities, which covers • Awareness of potential food safety problems that may occur during food transportation • Basic sanitary transportation practices to address those potential problems • Responsibilities of the carrier		
13.4.8	The site shall keep all records related to U.S. transportation operations and transportation service contracts as original or electronic records for a minimum of 12 months beyond termination of the activity or contract. Offsite records shall be retrievable within 24 hours.		
13.4.9	The recordkeeping policy shall ensure all sanitary design requirements and cleaning procedures for vehicles are maintained onsite and all offsite		

	records are retrievable within 24 hours.		
13.5.1	Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following: • Principles of food hygiene and food safety Produce safety standards applicable to an individual's job		
13.5.2	Personnel (permanent and temporary) who conduct harvest activities (including washing and cooling) must receive additional training on the following: • Recognizing produce contaminated with known or reasonably foreseeable hazards • Inspecting harvest containers and equipment to ensure that they are clean, maintained and do not contaminate produce with hazards • Correcting problems with harvest containers or equipment		

13.5.3	One or more supervisors or individuals responsible for the operation must have successfully completed food safety training equivalent to standardized curriculum recognized by the FDA.		
13.5.4	A supervisor shall be identified with responsibility for the operation and ensuring compliance with Produce Safety regulation. This individual shall be identified on the site's organizational chart.		
13.5.5	Personnel (permanent and temporary) shall avoid contact with animals or take measures such as hand washing and protective clothing to prevent contamination of produce and food contact surfaces following contact with worker animals.		
13.5.6	The water distribution system supplying agricultural water used for harvest, packing, holding—and associated equipment—shall be maintained, regularly inspected and equipment properly stored to prevent the system from being a source of contamination to produce and food contact surfaces. The system shall be inspected for		

	conditions, which could introduce known or foreseeable hazards into or onto produce. Where testing of the water source or system inspection reveals contamination, deficiencies shall be corrected such as the repair of well caps or sanitary seals.		
13.5.7	Agricultural water treatment must be delivered and monitored at a frequency that ensures water is safe, of adequate sanitary quality, and meets the microbial quality criteria of no detectable generic Escherichia coli (E. coli) in 100mL.		
13.5.8	Potable water quality standards used shall ensure the microbial quality criterion is met, which is no detectable generic E. coli in 100 mL.		
13.5.9	Where agricultural water does not meet microbial quality criteria or is determined to be unsafe and not of adequate sanitary quality, water use must be discontinued along with treatment or other correction that reestablishes sanitary quality and microbial criteria. Where water treatment is not performed, re-inspection of the entire affected agricultural water system shall be		

	conducted followed by the identification of conditions leading to the introduction of hazards into or onto produce or food contact surfaces, correction, and verification of correction to ensure water meets microbial quality criteria.		
13.5.10	Agricultural water testing may be performed by the site (or site representative) or by a third party provided representative samples of the site's water source is secured. Aseptic water sampling must be performed. The method of analysis for water testing is U.S. Environmental Protection Agency (EPA), ‘‘Method 1603: Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC), EPA–821–R–09–007),’’ December, 2009 or equivalent method.		
13.5.11	During harvest, packing and holding operations (e.g., hydrocooling, washing), manage water to maintain its safety and sanitary quality and prevent contamination of produce to include establishing and following a water-		

	change schedule for recirculated water. Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris). Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to minimize infiltration of pathogens into produce.		
13.5.12	Dropped produce (i.e., produce that comes in contact with the ground prior to harvest) where the produce would not normally touch the ground as a part of growing and harvest (e.g., cantaloupe, almonds, etc.) shall not be distributed.		
13.5.13	Sewage disposal and septic systems shall be controlled and appropriate for the site to prevent the contamination of produce and food contact surfaces.		
13.5.14	Plumbing shall not allow backflow or cross-connection between waste and potable water lines.		
13.5.15	All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe after being made by the		

	supervisor or responsible party.		
13.5.16	All produce safety documents and records must be retained at the site for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours. Records related to equipment or processes used by the site for analyses, sampling, or action plans—including the results of scientific studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued.		
13.5.17	Specific additional requirements for the harvesting, packing, and holding of sprouts. Establish and implement a written Environmental Monitoring plan for the testing of Listeria spp or Listeria monocytogenes. The environmental monitoring plan shall include the following criteria: • Target test (i.e., Listeria spp. or L. mono) • Sample frequency (no less monthly)		

	• Sample timing (i.e., when in the process are samples collected) • Sample sites where the number of samples and location are sufficient to determine the efficacy of controls (includes food contact and non-food contact surfaces) The plan shall describe aseptic methods for sample collection and testing according to FDA's "Testing Methodology for Listeria species or L. monocytogenes in Environmental Samples," Version 1, October 2015 (or equivalent).		
13.5.18	Specific additional requirements for the harvesting, packing, and holding of sprouts. The environmental monitoring plan shall include a corrective action plan if any samples are positive for Listeria spp. or L. mono. If Listeria spp. or L mono are identified in the harvesting, packing, holding area, the following activities shall occur as a part of		

	the corrective action process: • Resample positive surfaces and the surrounding area to determine the extent of contamination • Clean and sanitize the affected and surrounding areas • Resample and re-test to confirm the elimination of Listeria spp. or L. mono • Conduct finished product testing as appropriate • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce		

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.