Audit Report **Global Standard Food Safety Issue 9**

1. Audit Summary			
Company name	Vion Tilburg BV	Site code	1886989
Site name	Vion Tilburg BV		
Scope of audit	The slaughtering of cattle and the deboning, cutting to specification and packing (foil or vacuum) of beef. The production and packing (foil, crate or drum) of slaughter by-products, semi-processed scalded stomachs.		
Exclusions from scope	None		
Justification for exclusion	None		
Audit start date	2023-03-07	Audit finish date	2023-03-09
Re-audit due date	2024-05-10	Head office	No

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

2. Audit Results					
Audit result	Certificated	Audit grade	B+	Audit programme	Unannounced – mandatory 1 in 3 years
Previous audit grade	A		Previous audit date	2022-04-14	
Certificate issue date	2023-04-24		Certificate expiry date	2024-06-21	
Number of non-conformities			Fundamental	0	
			Critical	0	

2. Audit Results		
	Major	0
	Minor	16

3. Company Details			
Site address	Enschotsestraat 28 5013 BD Tilburg		
Country	The Netherlands	Site telephone number	
Commercial representative name		Email	
Technical representative name		Email	

4. Company Profile					
Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift pattern	There are no real shift patterns				
Seasonal site	No				
Seasonal opening times (Start/end date)	Click or tap to enter a date.	Click or tap to enter a date.			
Other certificates held	ISO9001; Organic; IFS PIA; BLK				
Outsourced processes	No				
Outsourced process description	Click or tap here to enter text.				

4. Company Profile

Regions exported to	Europe Asia North America Choose a region Choose a region Choose a region
Company registration number	NL 87 EG
Major changes since last BRCGS audit	New responsible person for sales. New offices. Construction works for stables are starting shortly as well as the construction of an extra corridor for better circulation in the plant.

Company Description

VION Tilburg B.V. is a cattle slaughterhouse and industrial butcher. It is one of the several sites of VION Beef which is a company with global presence. Key numbers for VION group are employees with a turnover o , slaughtering pigs per week and cattle per week. Leadership is Dutch / German. The location Tilburg is NVWA approved (NL 87 EG). VION Tilburg B.V. produces beef products and slaughter by-products and offal (organs, processing of stomachs (scalding) and the processing of first stage of natural casing (cleaning/ heating of bovine intestines)). The cattle is bought by VION Rundvee BV at the general mostly Dutch market. Slaughter capacity is animals per day - per hour which is all done in 1 shift.

The cutting department is supplied by pre-selected carcasses and very first cutting. The department includes about 3 main routes (forequarter, hindquarter and butcher handling). There are many equivalent activities (deboning, cutting to specification). Packing is at semi-bulk level (no consumer packed items). Trimmings are packed loose in crates/ dolavs or vacuum packed. The by-products are packed loose in crates/ dolavs or vacuum packed. The main customers are operating companies in the VION Food Group, retailers related processing within the Netherlands and Europe, and business to business in Asia and Canada.

The site is situated at an industrial area near the centre of the town Tilburg. The oldest part of the building is from 1920. In 2006 a new building for the cutting and packing departments has been constructed. Currently plans are defined on extending staff facilities, extending storage of crates and primary packaging material, and alteration of offices. Some beef is sent to an external provider for freezing, packing and final storage (GFSI certificated.). Some products from sister VION company in Enschede are cross docked in Tilburg.

VION Tilburg B.V. is certificated against ISO 9001 (multi-site certification) and holds SKAL approval (001997), CoC declaration and certificate for trading of BL2* meat. At the moment the company employs approximately people (including subcontracted personnel). The production takes place in one shift. The surface is and the used quality system is based on one HACCP-study. www.vionfoodgroup.com.

5. Product Characteristics					
Product categories	01 - Raw red meat Category Category Category Category Category Category Category				
Finished product safety rationale	Cooled red meat and by-products/offals. Beef intended for further raw processing is under a positive release regime.				
High care	No	High risk	No	Ambient high care	No
Justification for area	Appendix 2 is applied. In general beef and by-products are heated in one of the next stages of processing at the customer. Beef intended for further raw processing and consumption is under a positive release regime.				
Allergens handled on site	Milk Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen				
Product claims made e.g. IP, organic	BLK Organic				
Product recalls in last 12 months	Yes				
Products in production at the time of the audit	Different meat cuts, such as Sirloin 7kg+ 3-rib, shelf life Tail, shelf life				

6. Audit Duration Details			
Total audit duration	24 man hours	Duration of production facility inspection	12 man hours

6. Audit Duration Details

Reasons for deviation from typical or expected audit duration	None		
Combined audits	None		
Next audit type selected	Announced		

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)

Name	Job title	Opening meeting	Site inspection	Procedure review	Closing meeting
	Production Leader	X	X	X	X
	Quality Manager	X	X	X	X
	Quality Manager	X	X	X	X
	HR Manager			X	
	Commercial Manager			X	
	Maintenance Manager			X	
	Cutting department		X		
	Expedition		X		
	Slaughter		X		
	Slaughter		X		
	Slaughter		X		

GFSI Post Farm Gate Audit History			
Date	Scheme/Standard	Announced/Unannounced	Pass/Fail
2021-04-08	BRCGS Food	Announced	Pass
2022-04-14	BRCGS Food	Announced	Pass

Document control			
CB Report number	RQA9732086/5246704		
Template name	F908 Food Safety Audit Report Template		
Standard issue	9	*Template issue date*	2022-12-16
Directory allocation	Food	*Version*	1.1

Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements			
Clause	Detail	Critical or Major	Re-audit date

Critical		
Clause	Detail	Re-audit date

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

Minor						
Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1.1.2.	The company has established a Food Safety Culture plan, which however does not include an action plan indicating how the activities will be undertaken. The focus is on measurement only. Also, behaviours required to maintain and improve product safety processes are not included in the plan.	An additional action plan is drawn up describing how the activities are undertaken in accordance with (PDCA). Behaviors that are necessary to maintain and improve product safety processes are also added. Seen document dated 17/03/2023	Former study on improving culture has been expanded by the branch manager with an addition to improve food safety culture requirements from BRC audit shortcomings. A form (or perhaps series of forms) is drawn up by the HR department to register specific food safety culture parameters. Subsequently, input is collected monthly at defined locations, which is discussed at least once a month in the work / HACCP meeting. Results and resulting actions are recorded in the minutes of	Vion's set-up with regard to culture is broader than just food safety. From that point of view and central procedure, a first, possibly partly incorrect and less effective, proposal for improving food safety culture has been drawn up.	1023/04/11	

Minor						
			this meeting. Monitoring progress is done via PDCA circle. A summary of measured values and actions will also become a permanent part of the quarterly Q report, which will also be discussed/assessed within the MT. After implementation, follow-up actions are measured and assessed again to test the effectiveness of the action taken. See appendix: Proof minor Clause 1.1.2. and 7.2.1.			
1.1.4.	Food defence is not taken into consideration in the management review.	A correction is no longer possible.	Vion Tilburg's Q report will be substantively adjusted from Q2 2023 and provided with relevant information every quarter, making it possible to include a final assessment regarding Food Defense in the management review every quarter and after the end of the QA year. Also	The existing Food Defense procedure shows that there is relatively little risk of being able to approach open product while Vion personnel are present. The risk lies more in the moments when Vion employees are absent. The registration of, among other things,	2023/04/11	

Minor						
			start-up with new registration form F-TIL-NL-10167 regarding daily opening and closing time of carcass and finished product cold stores. Further options for information provision and recording are being investigated and possibly implemented. See also appendix: Proof minor Clause 1.1.4.	the moment of opening and closing of areas where the stock of meat is located has never been implemented, checked and or has never been part of Food-defence.		
1.1.12.	The minor non-conformity of 2022 with regards to recall testing has not been correctly addressed.	No specific correction possible on this item.	Audit shortcomings and associated improvement actions from audits will be better monitored through discussion, registration and progress (PDCA) in multiple consultation structures, including work/HACCP and MT consultation. Proof Minor Clause 1.1.12, 3.4.4, 3.7.2, 4.4.1`, 4.14.9. Correcting measures.	During follow-up, this shortcoming was only visible at the QA department and was insufficiently shared within the entire organization, resulting in insufficient monitoring and possible recovery of substantive finishing.	2023/04/11	
2.11.1.	For CCP3 the corrective action which has been	A: Procedure regarding CCP 3 temperature on receipt has	A: Procedure P-TIL-NL-00006 adapted in digital	A: The content of the procedure has not been	2023/04/11	

Minor						
	defined is ‘cooling’ of raw materials that are received at temperatures that are too high, which does not correspond with what is legally acceptable (note that no actual cases were seen). Equally, for the CP metal detection personnel could not indicate that products needed to blocked since the last control.	been modified. It has been included that if the critical limit values are exceeded, the product will be blocked and returned. B: For the CP metal detection procedure will be modified and additional training will be given to related personnel to clarify the content of the procedure regarding blocking and re-checking product. All the product from the moment of detection of the deviation to the moment of the last correct recorded measurement must be blocked and undergo the metal detection process again. After that it is only suitable for delivery. Seen procedure P-TIL-NL-00006v8 dated 22/03/23	handbook . B: Procedure P-TIL-NL-10061 has been modified. By periodically performing the weekly verification (responsibility of the department manager) of this process together with an employee of the QA department, there is a better / "broader" monitoring that procedures that have a direct involvement with the HACCP system are carried out correctly and that involved personnel with the appropriate qualifications. In addition, all employees who are involved in CCP registrations and or are involved in the CP metal detection detector control are placed in the system by the HR department, so that periodic training is	drawn up clearly enough by the QA manager. B: Unclear description in procedure, perhaps not correctly understood during HACCP training and CCP instruction of employee and no competence assessment of related personnel.		

Minor						
			monitored. See Proof minor Clause 2.11.1 A, 2.11.1B, and 4.10.1.3.			
3.4.4.	The company performs preSSOP and SSOP checks, which however do not appear to be effective as evident issues could be seen during the audit.	Renewed instructions for employees responsible for the checks is done. Seen records of training.	Vion Tilburg will train responsible involved employees of production departments (including chefs, foremen) in a more substantive way and point out their responsibility to fill this in correctly (or have it filled in correctly). Before the end of 2023, Vion Tilburg wants to develop a workable (ICT) method to follow up actions from PRE-SSOP and SSOP. A test with a digital SSOP checklist for one department is also being started to investigate whether this can lead to more effective registration and follow-up. After investigation, further implementation of other controls in the same department or expansion	In addition to production, employees in production are also responsible for the correct performance of checking and administrative tasks. The observed deviations should have been observed/registered and remedied by these employees.	2023/04/21	

Minor						
			to other departments will be investigated. See Proof minor Clause 1.1.12, 3.44, 3.7.2, 4.4.1, 4.14.9.			
3.7.2.	There is no systematic approach to the verification of the effectiveness of corrective and preventive actions.	Development of a new type of list which includes these items.	In addition to improvement of deviation 3.3.4, the verification of effectiveness by means of element CHECK (PDCA) will also be included and will be discussed periodically in work/HACCP and MT. See Proof minor Clause 1.1.12, 3.44, 3.7.2 4.4.1. 4.14.9.	Approach is not systematic and effectiveness is not centrally recorded and discussed in work/HACCP consultations and MT.	2023/04/11	
3.11.3.	The recall test that is done by the company does not take all the aspects of the recall procedure into account.	Physical Recall test was already performed before BRC audit. The report has been rewritten on the basis of available information and supplemented with the applicable aspects from the central procedure. This was then assessed in an additional HACCP team meeting. Seen new report	Procedure P--VION-10015 Crisis management of Vion QA central is leading and will be tested again in Q2 2023 in accordance with BRC requirements by Vion Tilburg.	QA Vion Tilburg has underestimated the substantive requirements of BRC regarding extensive testing of the recall procedure. There was confusion that in an actual recall, the test should not be performed in full. Inquiries with central QA, however, make it clear that the	2023/04/21	

Minor						
				central procedure has been adjusted (in the past), so that the entire procedure P-VION-10015 still has to be gone through and must be demonstrably tested.		
4.4.1.	In the Vario area, some plastic wallboards were no longer correctly attached to the wall, which leaves an opening and where an environmental contamination could occur (note: no contamination seen).	Repair by technical service Vion Tilburg. Pictures seen	Better planning and implementation of structural improvement management from PRE-SSOP and SSOP checks and other sources. Priority setting should not only be determined and monitored by TD management but in a broader group (work consultation / HACCP consultation / MT). As a result, the repeated reporting of the same deviation(s) and the actual ability to cross off the improvement management achieved should be monitored more effectively. See Proof	Lack of observation and registration of deviations, and correct communication and timely planning of this by managers. As a result, this structural shortcoming was not resolved in time.	2023/04/21	

Minor						
			minor Clause 1.1.12, 3.44, 3.7.2 and 4.4.1. 4.14.9.			
4.6.2.	Workers have cut pieces of meat/grease to place them in between the different tables to avoid these tables from sliding. This is a potential source of microbiological contamination.	Direct communication by production manager that using meat and/or fat as a "filler" to prevent cutting boards from sliding is not acceptable, as seen during the audit by the auditor. Placement of metal pieces instead of grease (picture seen).	The technical service receives an overview from the production manager of where the cutting boards are not positioned properly on the frames. Subsequently, technical adjustments are made (stainless steel strip welding) which permanently prevent the cutting boards from moving. It is then no longer necessary for employees to use a product as an "emergency solution" to prevent the cutting boards from sliding. See Proof Minor Clause 4.6.2. Repair sliding of cutting boards.	Lack of observation of deviations and correct registration and communication of this by managers. Due to this failing approach, employees who suffered from sliding cutting boards started looking for their working solution.	2023/04/11	
4.6.3.	The formal commissioning procedure has not yet been completely installed. Elements are	Procedure/checklist for commissioning new equipment F-TIL-NL-10168 has been added to the digital quality manual and is being	The various departments and company managers involved will make their contribution within the existing consultation	Due to historically fragmented information provision between the various departments within the Vion Tilburg	2023/04/11	

Minor						
	found through meetings and through e-mails, but there is no formalized approach to assure that all the elements are taken into account.	implemented in the organisation.	structure (including work consultation / HACCP team / MT), which will be registered on checklist F-TIL-NL-10168 and should lead to formal approval of new equipment. See Proof minor Clause 4.6.3 commissioning new machines.	organization, no formal procedure has ever been drawn up for the commissioning of new machines/equipment.		
4.10.1.3.	During the interviews, personnel could not indicate that in case of malfunction of the metal detector, all products since the last test need to be blocked.	Adjustment of the metal detection procedure, so that the corrective action required in this case is stated more clearly. Plus re-instruction / training of employees involved. Seen training records	Re-instruction of related employees for the CP metal detection procedure. Also introduction monitoring of training related employees via HR department (system) which guarantees annual training and competence. See Proof Minor Clause 4.10.1.3. and 2.11.1B.	Insufficient planning, training and competence assessment of employees involved, who did not understand the procedure, have not been recognized by their own organization (Vion Tilburg).	2023/04/11	
4.14.9.	During the in-depth inspection of 16/11/2022, 26 different action points were defined by the external pest control company.	Correct and timely communication of the annual report "Technical Pest Control Inspection" during the technical consultation. The assessment of the report	Communication/instruction within the QA department that this type of reporting will be demonstrably assessed as soon as possible after receipt.	The report with these deviations was sent to QA and initially did not appear to be correct in terms of content (number of pages without text).	2023/04/11	

Minor						
	These points had not yet been handled (no corrections / corrective action plan).	must be handled in accordance. The report was sent through the maintenance during the audit, as witnessed by the auditor.	Applicable improvement actions must be communicated with those involved in the appropriate consultation structures (technical consultation, work/HACCP consultation) and documented there with sufficient evidence. See Proof minor Clause 1.1.12, 3.44, 3.7.2, 4.4.1, 4.14.9.	Subsequently, this was reported to the company concerned on 17-11-23 by QA. No new adjusted report was subsequently sent, so that Vion Tilburg was unnecessarily waiting for an "adapted" report. As a result, it was not communicated during the technical consultation and was discussed, assessed and provided with actions.		
5.9.3.	The company collects all fat from the slaughter line into the bulk fat. Traceability is assured through a one full day traceability principle, where the bulk fat produced on day X contains fat from all animals slaughtered on day X. It was however seen that fat was returned from the cutting area and added to the bulk fat. This fat is	The activity was immediately stopped during the audit and the fat seen was returned to the cutting area (seen by auditor during the audit).	After the return of the Branch manager (early week 14), Vion Tilburg will discuss this in work consultations/HACCP team. Vion Tilburg must determine whether we want to continue this working method after implementation of the correct preconditions (description and traceability) in the QA system (QOL) or whether this action will be	Internal miscommunication of the employee(s) involved.	2023/04/11	

Minor						
	however coming from animals that were slaughtered on day X-1. Note: all fat was immediately removed.		definitively stopped. Planning will be ready at the end of week 14.			
7.1.2.	Personnel that is engaged in metal detection (CP) and CCPs are correctly trained. However, competency assessments are not planned.	A form has been set up to guide the competency assessments.	Commissioning of new form through human resources department recording both training for CCPs and CP metal detection and also establishing competence of related employee. By then including this in the system present at Human Resources, periodic (yearly) competence assessment can be guaranteed. See proof minor Clause 2.11.1, 4.10.1.3.	An automated system that monitors periodic assurance by means of a calendar has never been used for this purpose.	2023/04/11	
7.2.1.	During the plant tour, it was seen that not all personnel was wearing the snood correctly. One person was seen wearing a watch.	Instruction for managers and employees that the hygiene measures as described in the hygiene regulations must be correctly observed and checked. This means that	Instruction for managers and employees that the hygiene measures as described in the hygiene regulations must be correctly observed and checked. This means that	Insufficient discipline/attention to existing hygiene regulations	2023/04/21	

Minor						
		beard nets must be worn correctly. Seen records of production meeting.	beard nets must be worn correctly. Employee who wore a watch received a written warning. If deviations are found, they should be better registered on the SSOP lists under the personal hygiene section, so that the actual scope of the problem becomes more transparent. (P.S. This will also be a measuring point with regard to the additional food safety culture plan). See proof minor Clause 1.1.2 7.2.1.			
7.2.4.	Batches of plasters that are used are metal detectable, but there is no evidence that they are tested on metal detectors (Note that this was done during the audit and the batch used was metal detectable).	Tested during the assessment and the batch in use could be detected.	The inspection of metal detectable plasters will become part of the standard occupational health and safety activities. With a new batch, plasters are tested for detectability using detector(s) placed at Vion. The result is recorded in writing. This ensures	Vion Tilburg's "former" metal detectors were unable to intercept the then metal detectable plasters. This is now possible due to the introduction of newer detectors plus the current use of "long blue patches". However, this had not been re-	2023-04-11	

Minor						
			periodic physical checks, suitability and registration. In addition, each batch of plasters is demonstrably tested for suitability. See proof minor Clause 7.2.4.	examined in recent years or guaranteed by QA and/or HR.		

Comments on non-conformities
None

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical		
Clause	Detail	Re-audit date

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

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

Audit team

Lead auditor		
Auditor number	**First name**	**Second name**
[redacted]		

Audit team				Attendance (YYYY/MM/DD, 24hr: MM)			Presence	
First name	Second name	Auditor number	Role	Audit Date	Start time	End time	Remote or physical	Professional recognition number
[redacted]			Lead auditor	2023/03/07	07:30	16:00	Physical	
			Lead auditor	2023/03/08	07:00	15:30	Physical	
			Lead auditor	2023/03/09	07:00	15:30	Physical	

1. Senior management commitment

- **Product safety and quality culture plan:** The level of the 'culture' at the site is identified by introducing and implementing a plan for the development and continuing improvement of a food safety & quality culture (verified this plan dated 16/01/2023 and procedure P-FOOD-10059 dated 18/01/22). The plan however is more a way to measure the food safety culture and does not include all elements as defined in the Standard (minor non-conformity). Clear individual and group values, attitudes competencies and patterns of behavior were visible (seen f.i. whistle blowing system for confidential reporting, training, preSSOP and SSOP measures). The success of this plan is measured by means of mostly results of external audits. The reviews on the plan are performed 4 times a year (during every individual quarterly meeting). Senior management was available to discuss the plan during the audit. Spoken tc - plant manager. Product safety, Food defence, Food Fraud, quality culture and continual improvement is also outlined in the company policy (seen policy of date: 13/02/23, signed by).
- **Food safety and legality objectives:** Clear targets are set for production in through optimizing of the organization concerning food safety and growth. These are discussed in the quarterly management reviews and are applicable for the coming fiscal year (July → June). Results or significant trends that confirm how well the company was doing against the targets of last year are outlined in the management review. Further objectives are for instance: number of food safety and number of product integrity complaints per 100,000 kg, with targets of 0,2. Frequency of objectives monitoring in meetings is at a minimum 4 times a year and at least annually management review is set up. Verified quarterly meetings last one 10/01/2023.
- **Management Review:** In the yearly Management review (verified last MR 19/07/2022) all required items are discussed, and Food Safety objectives are set. Present during this management review meeting are site manager, production manager, QA manager, technical manager. Food defense is however not taken into consideration (minor). Actions and decisions are communicated through the meeting structure that is in place.
- **Regular meetings:** Verified overall meeting schedules. Several routine meetings are held in which food safety, authenticity, legality, and quality issues are discussed. Meeting structure is set in document F-TIL-NL-10078, dated 02/05/2022. Senior management is present during most meetings. Meetings are sufficiently provided with action lists with timescales, responsibilities and recording of status. Verified last operational meeting date: 28/02/2023.
- **Previous non-conformities:** Not all non-conformities have been closed out suitably (minor), but other have been correctly handled, with root causes for previous non-conformities identified and preventive actions were implemented.
- **Organizational structure, responsibilities, and management authority:** The senior management has appointed qualified employees for key functions. Responsibilities and competences are laid down in job descriptions (such as seen for a shift leader (voorman) and the operational manager. The organizational structure (seen document 01/2023) reflects the current structure and reporting is up to dateSite management team includes Food Safety Manager. The QA department responsible for food safety, legality and quality items is reporting within the management team meetings. Clear responsibilities/competences have been documented in the job descriptions, including arrangements in case of absence of the responsible staff. All staff are aware of their responsibilities and have access to relevant procedures. The site does not use a food safety consultant in the development / maintenance of food safety systems.
- **Reporting food safety issues:** Food safety risks, concerns or non-conforming product issues are reported by staff and resolved. This is seen based on the preSSOP checklist for example. The company keeps up to date with emerging issues, legislation, and good practice through the group structure.

- **Further remarks:** The logo is not used by the company. Last visit NVWA on 6+7/02/2023 (no report yet). Standard was available during the assessment.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
1.1.10.	Audit was unanncounced
1.1.13.	No use of BRC logo

2. The Food Safety Plan – HACCP

- **HACCP Team**: The organisation is having a defined food safety team with the team leader well qualified and experienced and the team consisting of multidisciplinary employees, who are experienced and knowledgeable in their fields with required level of food safety training. The HACCP team consists of plant manager, QA manager, departmental managers and maintenance manager. The HACCP Team is led by the Operations Manager Beef who has experience of more than 25 years in the food industry.
- **Documentation** is available in P-VION-10001 with regards to the global systematics and the framework, P-FOOD-10000 for the PRP definition and further in P-TIL-NL-10127 for the site hazard analysis.
- **Scope of HACCP:** HACCP system scope is laid down in P-VION-10000v17 and covers relevant processes and all products on site and transport until handover to the customer. Product is suitable for regular consumer groups. Product descriptions laid down in P-VION-10000v17. 1 global product group identified, with a positive release system for those products that can be used for the production of raw meat products. Relevant information is described and information on Food safety is included.
- **Process flow diagrams:** Key process steps / operations to manufacture products within the scope of certification were verified for all processes during the audit and steps were shown. The several stages can be recognised: f.e. purchase, receipt, storage, slaughter, cutting, packing, storage and dispatch. Last verification was 18/05/2022 for packaging and trimmings. The flow diagrams accurately reflect the production processes (seen flow docs: F-TIL-NL-100xx).
- **Hazard analysis:** The organization has drawn all process steps and has identified the hazards and associated risks against the steps. An assessment is made of microbiological (main risks Salmonella, STEC, Listeria), chemical (main risks heavy metals, pesticides, PCB, dioxines, veterinary residu's, the allergen milk is acknowledged due to slaughtering of cows/presence of udder), radiological and physical (metal, plastic) risks for all steps in the production process, packing material and general elements as indicated by Vion corporate structures. Once all the hazards for each process step have been identified, they are analysed taking into account the severity of the hazard and also the likelihood occurrence of the hazard affecting finished product. The risks are defined through the combination of frequency and severity in a 3x3 matrix, where hazards with a risk rating of 6 or 9 are CCPs, 3 or 4 are CPs and others are PRP. A decision tree is still used for the CCP to see whether control needs to be applied at that specific step or in a subsequent one. The HACCP Plan refers to existing regional, national and European standards in the field.

- **Critical Control Points, limits and controls:** Based upon the HACCP study 5 CCP's have been defined:
  - CCP 1
    Faecal contamination of carcasses, zero tolerance for visible faecal contamination just before the carcass cooling step. Formal monitoring is done on 5 carcasses at least 4 times per day. There is a daily verification of this CCP on the 5 last carcasses of the day. Monitoring is done at the end of the slaughter process;
  - CCP 2
    Temperature control of cooled (vacuum) packed beef and by-products at dispatch (expedition). The critical limits are the core temperature of beef <7ºC, intermediate surface contact temperature of vacuum packed cooled beef <6ºC, core temperature of animal by-products <3ºC, surface contact temperature of vacuum packed animal by-products <2ºC. This is measured on every dispatch of product in the product reception / dispatch area;
  - CCP 3
    Temperature control of externally slaughtered cattle (carcasses) of approved suppliers. Critical limits are core temperature of beef <7ºC, and (returned) cooled / vacuum packed beef and by-products.
    intermediate surface contact temperature of vacuum packed cooled beef <6ºC, core temperature of animal by-products <3ºC, surface contact temperature of vacuum packed animal by-products <2ºC. This is measured on every reception of product in the product reception / dispatch area;
  - CCP 4
    Removal of spinal cord at the slaughter department. Zero tolerance for visible spinal cord or husks of spinal cord just before the carcass cooling step. Formal monitoring is done on 5 carcasses at least 4 times per day. There is a daily verification of this CCP on the 5 last carcasses of the day. Monitoring is done at the end of the slaughter process;
  - CCP 5
    Transport and reception of partially chilled beef quarters conforming (EU) 2017/1981 with transport time of maximum of 6 hours. This is measured on every reception or dispatch of product in the product reception / dispatch area.

  Actions when monitoring level goes beyond acceptable limits are also mentioned within the HACCP plan, but not accurately for all CCPs (minor) and they are recorded and investigated. The CCPs which have been determined, including critical limits, are all checked during audit round, documentation review and vertical traceability test. Clear description of the key elements of the CCP's and PRPs.
- **Validation, verification and review:** The company has validated and verified the HACCP/ Food Safety Plan, including the critical limits, control measures and PRPs specific for controlling food safety hazards. Procedures of verification have been established to confirm that the HACCP or food safety plan, including if controls managed by prerequisite programs are still effective. Procedures include performing internal audits, review of records where acceptable limits have been exceeded, review of complaints (by enforcement authorities or customers), review of incidents (of product withdrawal or recall). Documentation and record keeping is verified. Results of verification/validation are recorded and communicated to the HACCP food safety team. The HACCP plan is reviewed and updated by the HACCP team whenever changes in the production or the related processes occur. The HACCP system is verified at least once a year by the Food Safety team. The HACCP- plan including all CCP's with critical limits has been verified during the management review. No special issues have been noticed by the team. Last time System, CCP and PRP are verified is 19/07/2022.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
None	

3. Food safety and quality management system

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

- **Food safety and quality manual:** Quality Management System with department specific work instructions is available on the network ( ) and accessible using workstations available on-site or in printed versions. Documents are available in Dutch and some procedures / instructions have been translated to Polish and Romanian. Documentation seen is up to date. Documents seen during the audit were complying. Only QA can make the changes into the system. Changes are indicated in the procedures in a yellow color.
- **Record completion and maintenance:** Records are in good condition and retrievable electronic or on site. Records retained as a minimum for shelf life +1 year.

3.4 Internal audits

Reference procedure: P-VION-10011 internal audits

The scope of the internal audit program covers the Food safety and quality management system. The Food safety plan, Food Defence and Food Fraud plans, PRP plan and the Food Safety Culture plan. All chapters of the system are audited with the related implementation in production.

Senior management is involved in the audits in a sufficient way. Internal audits are performed according to planning 14-03-2022 for 2022 and 23/02/2023 for 2023 (Vion Group planning) Internal audit plan is a rolling 1-year program. The program with scopes and frequencies is based on a risk assessment. The planning consists of 6 internal audits per year (full audit (2 times), traceability, animal welfare (x2) and third country compliance.

Internal audits are performed by Vion Group (other site). Internal auditors are trained (seen on 24-05-17 lead auditor training) and have sufficient knowledge of the products and processes. Findings of audits are taken in the meetings and in the action lists. In this the auditors and auditees are involved directly. Timescales of corrective and preventive actions are determined and demonstrable.

The last year's internal audit plan was reviewed, and the findings related to food safety were all closed. The root cause analysis, correction and corrective actions showed satisfactorily the closure of the non-conformance. Verified the general internal audit of Tilburg date 12/12/2022 (5 minor remarks) and the internal audit of Tilburg date 25/04/2022 (6 minor remarks). All actions were closed or within due date. All actions are also collected and discussed in the quarterly (management review) meetings.

Hygiene (GMP) rounds are performed through the pre-SSOP and SSOP activities undertaken by production before start-up of the lines. However, as it was seen during the assessment, this approach is not completely effective (see minor non-conformity). Seen the pre-SSOP and SSOP lists of the traceability test and of 07/03/23.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Reference procedure: P-NLFOOD-1055 Management of suppliers of raw material, services and packaging.

Formally, the company buys live cattle from an internal company, which is called “VION rundvee” (represented during the audit). Cattle is bought through the own personnel, traders or directly from farmers. The quality requirements for cattle are indicated on document P-TIL-NL 10147. Cattle is fully followed through the I&R system which provides for identification and background information of the animals (government managed). Some meat is bought from other Vion sites. Seen procedure P-FOOD-10048 procurement sourcing process. The raw material risk assessment is taken in the HACCP study, as an integral part of it and includes microbiological risks as well as potential chemical (medicines, antibiotics) risks and radiological risks. No allergen issues. Migration for packaging is equally taken in the risk assessment. No exeptions with regards to purchase procedure and VKI possible.

Suppliers, other than cattle are required to hold GFSI certification, which is the case for all suppliers (no traceability testing needed). Cattle can be bought through a trader, but VKI rules apply. This includes the whereabouts of the animal throughout its life.

Suppliers are monitored on an on-going basis, leading to an annual supplier evaluation. This evaluation is based on food safety issues, whether the documentation is up-to-date, and this is balanced with the number of deliveries. The assessment is based on enquiries at each VION site involved. This results into an approved report of VION suppliers divided in food/meat, ingredients, packaging, sourcing suppliers as cold stores and transport, service suppliers. No exemptions are seen, if for high risk no GFSI certificate available than an audit is done. This approach includes agents and brokers.

Suppliers reviewed are ., Vion Rundvee, ,

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Cattle that arrive in the company has different checks. At first, a VKI check is done to see whether it is the correct animal and that there were no issues with regards to medication, diseases, etc … This is already checked by the company guard and records are present on document F-TIL-NL-10112. Seen for the reception during the traceability test. If there are issues, this is immediately flagged. In a next step there is a verification done, per animal, by the government (nVWA) to see whether the animal is slaughter worthy.

For meat that is bought in from external Vion companies (own Group), a verification is made, taking into account the temperature (CCP), the cleanliness of the truck, the labelling and whether the carcasses are clean. This is recorded on F-TIL-NL-0008. Instructions are available in the logistics area.

Packaging is visually checked for any deviations that are seen.

3.5.3 Management of suppliers of services

Reference procedure: P-NLFOOD-1055 Management of suppliers of raw material, services and packaging.

The approval was shown for all contracted services. Service suppliers (based on risk assessment) are evaluated yearly at a group level and by the site as required from group level, together with raw materials the evaluation.

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

- Pest control ( ), seen contract dated 18/12/19
- Crate cleaning company ( ), seen guidelines for acceptance of clean crates dated 02/09/14
- Contracted cleaning ( ), seen 23/03/22
- Transport ( ), seen SLA dated 28/04/21

3.5.4 Management of Outsourced processing

No outsourced processing.

3.6 Specifications

Specifications of packaging and finished product are based on items regarding to suitability for its purpose and (migration) tests/declarations. Specifications are present in electronical form.

Specifications contain relevant aspects and requirements; they include key data to meet customer and legal requirements, limits for relevant attributes (e.g., relevant chemical, microbiological, physical and allergens standards) and assist the user in the safe usage of the product. Specifications are reviewed at least every three years or if changes occur. Reviewed several specifications during the audit, for example:

- Finished product: article
- Cleaning agent: 10/11/2015
- Lubricant: , dated 03/12/2020
- Packaging: Foil for vacuum packing, 23/04/20 and DoC 25/06/20

3.7 Corrective and preventive actions

Reference procedure: P-TIL-NL-10229 Corrective and preventive actions

Corrective and preventive actions are managed depending on where they are defined. For internal audits for instance they are managed through the internal audit report structure (seen for internal audits as listed in clause 3.4. with regards to internal audits). This means that the structure that is put in place is quite disperse. Corrective actions could however be demonstrated but the verification of the effectiveness could not be fully demonstrated (minor non-conformity). Tremendous progress has been made with regards to the management of SSOP and pre-SSOP compliance, where the actions have been correctly introduced. A full root cause analysis (so called A3 matrix improvement plan) is initiated only when there are major non-compliances (no examples).

3.8 Control of non-conforming product

Reference procedure: P-TIL-NL-10229 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 leaders. Corrective and preventive actions are described in several work instructions. Clear process well understood by staff that was interviewed during the audit.
Manual hold by labelling pallets of recipients with red label covering the required information. Release of products on hold by production manager or QA-staff. Segregated section in different places of the process (eg carcasses that need to be cleaned up are done on-line, if nVWA takes samples this is marked with a black plastic). Corrective and preventive actions system is up to date. The handling of non-conforming products is according to requirements. Product returned to the site is checked by the plant manager / QA manager for further acceptance. No blocked products seen during audit round.

3.9 Traceability

The traceability system covers the raw materials through work in progress to finished product including packaging materials and distribution according to procedure identification and traceability (P-TIL-NL-10067). This system is fully based on electronic data and written documents, day batch codes and bar codes:

- Cattle wear an earmark (+ accompanied by passport, track record and VKI according to Dutch I&R)
- Beef carcasses / quarters get a serial number (together with date of slaughter + origin + classification)
- Quarters (own production + additional purchase) get a batch code (date of production + origin)
- Finished product is traced depending on the date of production (SSCC-number per piece / crate / box is scanned at dispatch)
- Primary packaging materials are tracked based upon the date of starting a new batch.

Planned 1 test a year, however during the external audits several tests are performed and further, an internal audit with regards to traceability is performed as well. Further, organic certification equally asks for testing. Last one dated: 21/03/2022, order number was traced back and correct test with good conclusions was seen. No corrective actions, report including mass balance, carried out within 4h.

With a vertical audit list, during the audit, initiated by the auditor, traceability was tested on:
Product: vacuum tartar
Batch code:
Article number: , order number
Produced on: 10/01/2023 and 11/01/2023
BBE: 15/02/2023

Fast tracing (forwards/backwards) including packaging was possible in the records (for packaging and in the system for the meat). No rework. No product left, all sold. A trace was done back to the individual animals (stallijst) and the VKI information. No issues seen. All SSOP and preSSOP documentation, including packaging control, metal detection and CCPs could be retrieved within the 4 hour time limit.
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.

Conclusion based on this test: traceability system is working properly.

3.10 Complaint-handling

Reference procedure: P-TIL-NL-10229 Complaint-handling

A trend analysis is available as well as elaborate explanation in the management review. All complaints were settled adequately. Handling thereof was presented thought a complaint database and downloads thereof, which are combined with individual e-mails to complete the file. Seen data with regards to complaints 331355, 468987 and 356058. Food safety (which is defined quite largely) and integrity complaints are being followed as a KPI and are above the target (0,2 per 100 tonnes) at 0,23 for food safety and 0,26 for product integrity. Actions include mostly communication to personnel. Main complaint reasons are with regards to discussions about the article as such or the age of the product at opening. The first is subject to individual interpretations, whilst the second is not always the responsibility of the site (since B2B only).

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 flow that needs to be followed, and overview of instances to contact, and the national recall scheme from the authorities. Scenarios are discussed in the manual regarding incidents. Permanent contact person is always available in the organization (local and group level). The procedure, states that the Certification Body will be informed within 3 days of the event of a recall. The procedure is adequate for the type of business and in sufficient detail.

Planned 1 tests a year. Latest recall test seen dated 02/2023, article , order . The test however does not address all aspects of the traceability procedure (see minor). No recalls since last audit.

There were 0 recalls since the previous audit, but there were two withdrawals (B2B products) for potential chemical contaminants. Risk assessments showed no risk for food safety. 1 of the items was notified to LRQA (because of the specific question of the nVWA to do a GLF notification), which was not necessary for the other.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
3.5.4.	There is no outsourced processing
3.9.4.	No rework

4. Site standards

4.1 External standards

The site is in an urban area in the outskirts of Tilburg. No surrounding activities that need any specific attention. There is a canal located at about 100 meters from the plant, but there are quite some other buildings in between the site and the canal. External areas are paved and clean, with some controlled areas for debris of the transformation works that are ongoing as the company is currently building an extension to the site, but this temporary solution is correctly managed and will represent an improved situation once finalised (new locker and dressing rooms, transport of finished goods separated, new stables). No issues seen with regards to areas that might harbour pests.

The production site is fenced / surrounded by a wall. For those parts where, due to the building works, part of the fencing is removed, an adequate temporary solution is implemented, leaving no possibility to just walk on the site. In addition to normal checks, the integrity of the fence is checked daily by the guard, who is present during all activities. CCTV cameras are installed. Staff receive badges that provide access to different areas upon necessity. The badges are managed and access is given by HR. Staff training is performed upon employment and further annually. The site is registered with the government under number EG 87 NL. No external storage, no external intake pipes or no external tanks.

4.2 Site security and food defence

The TACCP team is the same as the HACCP team and holds the necessary competencies. The production site is fenced / surrounded by a wall. For those parts where, due to the building works, part of the fencing is removed, an adequate temporary solution is implemented, leaving no possibility to just walk on the site. In addition to normal checks, the integrity of the fence is checked daily by the guard, who is present during all activities. CCTV cameras are installed. Staff receive badges that provide access to different areas upon necessity. The badges are managed and access is given by HR. Staff training is performed upon employment and further annually. The site is registered with the government under number EG 87 NL – there are no specific requirements for training.

Food defence risk assessment documented and based on TACCP. Risk score calculation based on impact and likelihood of occurrence. Seen the Food defence plan (TACCP) P-FOOD-10051, latest verification during management review. The Food Defence plan is suitable for the site. The outcome of this TACCP is that all risks identified are mitigated.

4.3 Layout, product flow and segregation

There are three large parts on the production site. The first part contains the live animal stable and slaughter part, the second part is the cooling of the carcasses and finally there is a cutting part in the plant. There is 1 slaughter line and carcasses are automatically transported to the cooling areas. From there on, there is 1 main cutting line to cut the carcasses into quarters. Once this is done, there are three possible finishing lines for technical pieces, one line for meat cuttings and some smaller machines for grease collection and some minor products. In the slaughter area, the intestines are sent to a specific area, where there is a cold and a warm cleaning line. In the cutting area, the offal is collected and sent to a specific area for further collection. There are no high risk or high care lines, only open low care areas according to the BRCGS annex. The site plan was seen during the audit. This will be updated once the new building is finalised (note that global plans are already available). Temporary works are being done at this moment outside of the cutting department and have started at the exit of the stables (killing step). This is followed up by the maintenance department. No extra pest control risks are identified. Product moves forward in all instances, thus having a correct product flow.

Contractors and visitors are informed about the arrangements by the company guard, who holds the necessary information and can provide written information. All contractors and visitors need to register (in/out).

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

Suitable flow is implemented. In general, a correct building fabric, well maintained. Good facilities. Flat finished walls, suitable for processing and packaging activities – however in the Vario area it was seen that some plates that should be attached to the wall, were not correctly held (minor). Floors are well designed and in good condition. Some elevated walkways, access steps or mezzanine floors that are adjacent or above open product, sufficient protection is seen (closed below and sides protected). Drainage system and ventilation are according to requirements. 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. Plastic strip curtains are present. Condition and suitability were according to requirements

4.5 Utilities – water, ice, air and other gases

Compressed air is produced in the maintenance department. The compressor holds a filter as a first and at the end point use a supplementary filter is used in the area where the compressed air is in direct product contact (slaughter). The filter specification is 0.01 µm for the final filter (after a first, coarser filter and an active carbon filter) and the filter is taken in the preventive maintenance programme. Pressurised air is also tested microbiologically, result of 18/01/23 seen.

Water used is municipal water which is softened and distributed throughout the factory. Water is used for cleaning, but also in contact with the product on several places (rinsing). Further, water is used to produce ice (for stomach cooling) and steam (steam-vaping machine in the slaughter department). Requirements for water analyses are taken in P-NL-FOOD 10032 and 4 analyses are performed annually for organoleptical (smell, taste, turbidity), chemical (metals) and microbiological (E. Coli, total plate count and Enterococci) parameters. Further, the results from the drinking water supplier are requested every 3 months. Results of Q4 dated 21/12/2022 of the water was seen and the ice of 21/06/22– no issues.

There are no packaging gasses.

No other utilities are used regarding to the products. No special ventilation systems needed.

4.6 Equipment

Equipment installed is generally speaking suitable and designed for the intended purpose. In the slaughter line it includes typical equipment such as hide removal equipment, udder remover, intestine removal, all in-line. In the cutting department, saws, cutting machines, knives, tables, conveyor belts, etc … are typically used. Equipment is specified, tested and commissioned before use. No new equipment since last audit (but it is expected to have some for next audit). Equipment which is in direct contact with food is suitable for food contact and meets legal requirements where applicable. This was seen for the belts – declaration of 09/05/2022. Equipment mainly made of stainless steel. Belts are food grade. There is a procedure for moving static equipment detailing preventing potential risks to food safety and equipment integrity. Equipment that is not in use is always taken into the cleaning schedule and cleaned in the evening and stored clean for the following days. The risk based commissioning procedures has not yet been finalised – discussions are held in the management meetings and via e-mails, but this is not sufficiently formalised to assure that all items are always taken into account (minor).

Minor non-conformity was seen with pieces of grease that were cut to make the cutting table fitting (minor).

Mobile equipment and battery-charging equipment is in use, but not inside the production where there is open product.

4.7 Maintenance

Maintenance is by own resources and part of the maintenance is outsourced. The scope of the plan includes the full site. Inspection of equipment condition is undertaken where necessary, such as slaughter line condition inspection, filter checks and grease plan. Greasing plan is done through a daily greasing of all points that are necessary (grease inside is food grade oil and grease (seen 17/02/11 and 03/12/20).

Required maintenance is taken in where jobs are created and manually transferred to the maintenance mechanics, who provide daily feedback to close out the jobs in the system. Maintenance interventions can be daily to yearly, depending on the item to be maintained. Preventive maintenance and condition-based monitoring programmes are reviewed after repairing existing equipment. Where applicable RCA is performed to learn of repair and to prevent this happening again. Also, the schedule could be adjusted to inspect more. No temporary maintenance seen. No major breakdowns applicable in last 12 months on machinery that disturbed the delivery to customers. Documented hygiene inspections on start-up are completed daily through the pre-SSOP systematics. Attention for a hygiene clearance to production before starting production full cleaning after maintenance activities is implemented through books that the individual mechanics are carrying. Separate engineering workshop: no issue identified. No specific temporary maintenance seen, apart from the construction works.

Maintenance jobs seen include:

- for cooling installation, contract SLA , performed every two weeks by external company
- Cleaning of the condensors, annually, 07/02/2023
- Monthly in-depth inpsection of the slaughter line
- Several calibrations, see later.

4.8 Staff facilities

There were suitable changing rooms, even if these changing rooms are temporary ones and will be reconstructed following the current construction works. The rooms are sited near production in a separate area (temporary) of the packaging warehouse. Enough separation present – no cross-contact. Lockers for personal clothing/items are present. Toilets are not in direct contact with production. Separate storage of outdoor clothing is present. Well-equipped hand washing facilities in a hygiene sluice. Liquid soap, warm water, taps with hand-free operation and clear advisory sign to prompt handwashing. Boot washing is present and mandatory. Canteen is present, no catering. There is a clear policy regarding in the hygiene rules to food brought into premises; only to be consumed in the canteen. A refrigerator is provided for staff use. Eating is only done in the canteen. Correctly controlled facilities.

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

4.9.1 Chemical control

Approved chemical list documented in document 'chemieplan '. All chemical containers (with cleaning chemicals, clearly labelled) are separated stored. Cleaning chemicals are stored in a locked room

with restricted access (key available at the guard when the person has received training and is on the specific access list). Safety Data Sheets are available on the spot (seen 15/04/12 and 30/10/12). Materials are stored with provisions for leaking. After usage, a pH check is done by the cleaning company and verified by the company on a regular basis. No issues with pH seen.

4.9.2 Metal control

There is a daily knife check which is recorded on document P-TIL-NL-10137. Pens need to be metal detectable, as are plasters. A metal detector is installed and defined as a PA (no CCP – see further for more information). Clips and staples are not allowed in open product areas.

4.9.3 Glass, brittle plastic, ceramics and similar materials

The company has a glass control procedure P-TIL-NL-10054, which takes all the different steps to follow in case of breakage of glass / brittle plastic (changing of clothes, cleaning of shoes, product blocking, zone quarantining, cleaning and release). There is a check every quarter of the different places where brittle plastic is present. This is recorded on document F-TIL-NL-10047 and the last check was done on 18/01/23. This is also part of the pre-SSOP lists. No specific issues with regards to glass / brittle plastic breakage seen in open product areas. Windows are protected with a plastic film.

4.9.4 Products packed into glass or other brittle containers

No such packaging.

4.9.5 Wood

Wood is not allowed in open product areas.

4.9.6 Other physical contaminants

No specific other physical contaminants, except for bones that may be present in the finished product. Complaint numbers are however not indicating any issues with regards to this.

4.10 Foreign-body detection and removal equipment

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

Metal detectors are in place on most of the finished product streams. Since the products are meant for B2B only and that the weight of sold packs are rather large, metal detection cannot be accurate in all instances and cannot always be lower than 7 mm, which is suitable for these products – since they are B2B. Metal detection is thus defined as a CP. Since the products are delivered to B2B only, there is metal detection in the next steps of the supply chain when processing the meat. Whenever metal is found in the products, as seen for an injection needle on the day of the audit, an investigation is done. With regards to injection needles, this can (at the stage where it was found) not be traced back to a specific animal for further investigation.

4.10.2 Filters and sieves

There are no filters and sieves.

4.10.3 Metal detectors and X-ray equipment

Management of the metal detection is taken in document P-TIL-NL-100061. Depending on the place where metal detection is performed, the size of the metal test pieces ranges from 4 mm Fe, 5 mm non-Ferro and 6 mm stainless steel on the ‘snippers’ production line to 7mm ferrous, 7 mm non-ferrous and 10 mm stainless steel on the MP line and further to the use of 20 mm ferrous only. Checks are done at least 4

times per shift. Corrective action includes the blocking and re-assessing of the products since the last test. Metal detection findings are kept and given to the QA department. A full analysis is done. Most findings concern bolts and screws, hooks used in the production area and needles used to administer veterinary products. Last record of detection on 07/03/23. Relatively low number of complaints with regards to metal (e.g., 4 in the last two quarters). Process is suitable.

Metal detection was checked during the audit at the MP line, the 'snippers' line and the packed products line. Tests were correctly performed; detection was correct (belt stop or belt reverse system in place). Personnel could however not always indicate actions that need to be done in case of issues (minor). Metal detection results are recorded, for example on document F-TIL-NL-10064.

4.10.4 Magnets

There are no magnets.

4.10.5 Optical sorting equipment

There is no optical sorting equipment.

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

No such packaging.

4.10.7 Other foreign-body detection and removal equipment

No such equipment present.

4.11 Housekeeping and hygiene

Cleaning mainly by external company following schedules with frequencies and applied agents and procedures and cleaning schedules with frequencies as defined on 23/03/22. Cleaning is done as common in the branch: dry cleaning, flushing, foaming, (this includes disinfection based on peracetic acid and on hydrogen peroxide), flushing with city water. This is done on a daily base for most activities, but others are planned weekly, monthly, or half-yearly, depending on the need or on the risk. There are also weekly changes from the alkaline to the acid products. Seen records of cleaning during the week of the traceability test (checks of verification and the cleaning verification pre-SSOP and microbiological agar check of more than 60 points per weeks). Daily start-up checks with visual inspections are carried out, verified the week of the traceability test and of the day of the audit. In general, good results of cleaning could be noticed in practice. Hygiene scores monitored and subject to company quality objectives and are included in the management review.

This cleaning process is monitored by cleaning verification see 4.11.

4.11.7 Cleaning in place (CIP)

There is no CIP.

4.11.8 Environmental monitoring

A risk based environmental monitoring program is in place, typical sampling areas, organisms being assessed, frequency of testing, procedures for out of specification results are identified and verified.

Checks are done for Listeria, where 6 samples are done every week so that in a 3-week period all different points (cutting boards, conveyor belts, frames) are tested. No swaps test positive for Listeria.

This cleaning process is monitored by agar control, verified the results of analysis YTD, including the trend that is associated. Goal is to have less than 10% of points are in category 3 or 4 (goal which is met). Whenever there are non-conforming results, supplementary cleaning is performed. Also, residue tests are performed. A clear review and trend analysis is taken into the management review (no issues).

4.12 Waste and waste disposal

Waste containers are available throughout production areas and are emptied regularly to prevent an accumulation of waste. No accumulation was seen throughout the production area. No trademarked materials applicable. Legal requirements are met (e.g. separate storage and clear identification). Waste disposal is handled by licensed contractors: (paper, plastic, e.g.), and for category 1 and 3 waste

4.13 Management of surplus food and products for animal feed

No such products.

4.14 Pest management

The company has a contract with an external pest control service provider ongediertebestrijding (contract 18/12/19).
Frequency 12 times a year with 1 in-dept inspection, this frequency is suitable for the site as proven by the visit frequency (historical result = determination of frequency). Site map is available. Last visit: 01/03/23. Actions are taken and described in the action reports. Once a year in dept inspection is performed, verified report of 16/11/2022 – however the action points were not yet taken care of (minor).

Specifications of products / MSDS sheets are available on paper in a binder (seen for cockroach gel – dated 06/07/20). Competency of the pest controller is available and valid till 09/12/24. Staff also has been trained to identify potential pest activity. Trend analysis is done continuously as provided by the pest control company. Layout (with location of bait stations and monitoring stations is available and dated 02/02/20 with a verification on 04/01/23. Baits used are non-toxic. Bait stations are robust, made up of plastic material, secured in place and appropriately located to prevent contamination risk to product. During the site inspection no problems with pests were detected. No issues with pests since last assessments.

4.15 Storage facilities

Good storage of packaging, ingredient and product are seen. The storage facilities are suitable in relation to the operation. Warehouses are clean, dry, well-ventilated spaces protected from dust, condensation, fumes, odors or other sources of contamination. Waste materials and chemicals (cleaning products, lubricants, and pesticides) are stored separately. Temperature is control is required for raw materials, intermediate storage and finished products. Temperatures are monitored and recorded by computerized monitoring systems by the technical department through screens where current temperatures and settings are seen for cooling room E10. Alarms are set in the system. Maintenance of the system, including calibration of the thermometers by

There is no controlled atmosphere storage. There is no outside storage. Stock rotation is controlled by the FEFO system.

4.16 Dispatch and transport

The transport of finished goods is all outsourced to external service providers for which procedure P-NLFOOD-10037v5 applies: eg verified GFSI certification: company , questionnaire NL-FOOD-1003 of 19/02/21, IFS logistics certified until 08/01/24, and Distrifresh Boxtel, BRC S&D 29/05/23.

Measures taken by the company to prevent hazards associated with dispatch and transport of raw materials and finished goods to and from the site are temperature checks and hygiene monitoring controls. Transport is not done by own trucks. The temperature checks on products are CCPs 2, 3 and 5 (see higher).

Vehicle (including hygiene checks) and product checks are recorded at dispatch before loading. Vehicles back directly onto loading bays.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
4.5.3.	No gases / air in contact with product
4.9.4.	No such packaging
4.10.2.	No filters and sieves
4.10.3.5.	No X-ray
4.10.4.	No magnets for this product
4.10.5	No optical sorting equipment for this product
4.10.6.	No glass, cans or rigid containers
4.10.7.	No such equipment
4.11.7.	No CIP
4.12.4.	No such practices
4.13.	No products for animal feed
4.14.3.	Pest control is outsourced

4.15.4.	No controlled atmosphere
4.15.5.	No outsourced storage

5. Product control

5.1 Product design/development

There is no real product design or development. Product range may be a different cut, but even this is very limited and would consist out of a variation on current products – which is not limitless. Should changes be made, then this is taken in the evaluation (management review that includes food safety aspects) that is done quarterly and links to the HACCP study are automatically made. No changes in packaging types. No new developments since last audit.

Shelf life testing is done yearly, where an article from every group is tested. This is planned in document P-NLFOOD-10165, standards (microbiology, organoleptic) are taken in P-FOOD-10008. When shelf-life tests are done, there is a microbiological as well as an organoleptic test that is done. Typical shelf lives are 10 days for offal products, 14 days for trimmings and 35 days for other cuts (vacuum packed products). Fresh products generally hold 6 days of shelf life. Last test on product used for the traceability test was performed on 14/03/22 and seen during the audit – all results clearly within the tolerances (which is also the case for the other products seen).

5.2 Product labelling

There is almost no labelling done inside the company, as the only real raw material are live animals. After slaughter, these are provided with tags which include the identification number of the animal (e.g.), the birth date, class, weight and other information necessary for the rest of the process. This includes a scan tag, which is used to scan the animals into the batches that are created. Final product labelling is according to legal aspects as required by the company; several checks done during production tour (article sirloin and) hale). Finished product labelling includes specific regulatory information, such as the veterinary mark (NL 87 EG) and the information with regards to where animals were born, raised, slaughtered and cut. There is no artwork, so no approval (only B2B). There is 1 ingredient only and no allergens to be declared. Since all products are B2B, no specific cooking instructions are provided.

5.3 Management of allergens

The only allergen on-site is milk, which is present in the udder, but which is removed very early in the slaughter process. Risk assessment P-TIL-NL-10127 holds this risk. Correct removal of udders was demonstrated. Conclusion is that there is no risk of cross-contamination. There is no use of rework. Personnel needs to remove jacket when going to the canteen and must wash and disinfect hands before entering the plant again, so that there is no potential cross-contamination. There are no specific claims towards consumers and no specific attention with regards to cleaning and changeover when allergens are concerned.

5.4 Product authenticity, claims and chain of custody

The company has defined its approach towards food fraud in document P-TIL-NL-10224. The risk assessment is performed in document P-TIL-NL-10223, using probability of occurrence and detection potential and the final risk is considered to be low. As result, no suppliers / raw materials were seen with high risk which need a mitigation plan. This was last evaluated on 19/07/2022 (during the management review). Any information about issues is gathered by the company HQ and communicated to the site where necessary. The food Fraud team members are the same as the Food safety team members.

There are no specific additional control measures that are established, apart from in-depth verification of the VKI (beef passport) by the company and by the authorities.

Claims are made for organic products as well as for Beter Leven Keurmerk BLK products, both of which are externally certificated (certificates valid 31/12/23 for organic and 15/03/2024 for BLK). During these audits a trace exercise and mass balance is performed, and full mass balances need to be held. These are discussed during the management review and intermediate mass balances are followed up in the quarterly management meetings. This is equally part of the scheme requirements (to hold an own internal trace exercise and to hold a mass balance).

Finally, the company also has unannounced IFS PIA audits for product integrity (valid 08/02/24).

5.5 Product packaging

Packaging materials consist of in-process liners as well as final product packaging that can be applied. For all the primary packaging materials, documents of conformity are requested according to EU legislation. This management is done by VION headquarters. Obsolete packaging is destroyed through the waste channel (no trademarked material).

Suppliers sampled:) for the packaging of the traceability test, dated 25/06/2020 with TDC 24/04/2020.

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

Live cattle is inspected ante mortem by the company itself and by the government (nVWA) during the arrival at the slaughter house. Based on the findings and the VKI information (passport) received the animal can or cannot be slaughtered. Postmortem inspections as well as cattle classification according to SEUROP are equally done by a government official or an independent delegate.

A laboratory testing plan is developed for the next steps and is based on 2073/2005 EU legislation. All tests are done by an external lab , which is ISO 17025 accredited). Schemes are taken in document P-FOOD-10008 and P-FOOD-10009 as following:

- Carcasses: twice per week, 5 carcasses: total plate count, enterobacter, STEC, Salmonella (sampled the analysis of the week of January 9th to 13th, 2023)
- Quarters that are bought externally, every delivery, 5 carcasses: total plate count, enterobacter, Salmonella, Listeria
- Technical pieces, weekly on 5 pieces: total plate count, enterobacter, Salmonella, Listeria
- Vacuum products, once per week: enterobacter, Salmonella, Listeria (sampled the analysis of the week of January 9th to 13th, 2023)

- Trimmings, once per week: total plate count, enterobacter, staphylococcus, yeasts and moulds, Pseudomonas, Salmonella, Listeria and STEC (sampled the analysis of the week of January 9th to 13th, 2023)
- Offal: once per month: total plate count and enterobacter (sampled the analysis of the week of January 9th to 13th, 2023)

Products that will be used to produce ready-to-eat products are positively released on Listeria, STEC and Salmonella. The customer needs to indicate that the products will be used for ready-to-eat items. Seen for the product produced for the traceability test.

Shelf life testing is done yearly, where 1 article from a specific group is tested. This is planned in document P-NLFOOD-10165. When shelf life tests are done, there is a microbiological as well as an organoleptic test that is done. Typical shelf lives are 10 days for offal products, 14 days for trimmings and 35 days for other cuts. Last test if trimmings performed on 28/03/22 and seen during the audit.

For chemical contaminants, there is a government programme managed by RIKILT. There is one annual verification performed by the company itself, as seen for 31/03/22 (heavy metals, pesticides, OTA, PCB and dioxins). No issues seen.

Test results are trended and quarterly reports are made per category to see the evolution over time. There are for example trendings on the log of total plate count, Enterobacter, Salmonella and Listeria as seen done in the quarterly reports that are sent to Vion HQ. No issues seen.

When results are found to be out-of-spec, the actions depend on the type of parameter that is out-of-spec. If it does not concern a food safety issue, the process hygiene is examined. If it concerns pathogens, a risk assessment is made, and the authorities contacted if necessary. No such issues since last audit.

5.7 Product release

Positive release only for products that will be used for ready-to-eat items. These are analysed for Listeria, Salmonella and STEC (all pooled) and, according to the results, these products can be used for ready-to-eat items or have an alternative routing (e.g. selling to a processer who cooks). This process is described in procedure P-TIL-NL-10132. Checked for the product chosen for the traceability test.

5.8 Pet food and animal feed

There is no production of pet food / animal feed.

5.9 Animal primary conversion

The risk assessment with regards to prohibited substances is taken in the HACCP study and is considered as being sufficient. This is also sampled thought the government analysis programme (see above). The site is in receipt of live animals, which are inspected by the government themselves and the stable responsible. The VKI passport of the animal will already be verified before entrance in the stable.

The traceability system covers the raw materials through work in progress to finished product including packaging materials and distribution according to procedure identification and traceability (P-TIL-NL-10067). This system is fully based on electronic data and written documents, day batch codes and bar codes:

- Cattle wear an earmark (+ accompanied by passport, track record and VKI according to Dutch I&R)
- Beef carcasses / quarters get a serial number (together with date of slaughter + origin + classification)
- Quarters (own production + additional purchase) get a batch code (date of production + origin)
- Finished product is traced depending on the date of production (SSCC-number per piece / crate / box is scanned at dispatch)
- Primary packaging materials are tracked based upon the date of starting a new batch.

An issue was however seen with regards to bulk fat (minor).

Time and temperature requirements are fully established throughout the process and were found suitable.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.3.5.	No use of rework
5.3.6.	No such warnings needed
5.3.7.	No such claims
5.3.8.	No such processes necessary
5.8.	No pet food or primary animal conversion

6. Process control

6.1 Control of operations

Control of operations based on process control sheets as reviewed during the production round and for the vertical audit process trail which cover controls/inspection of the process and product relevant to quality and food safety (start-up-checks, settings/program, characteristics, inspections product, CCPs, product weight, label checks, etc.). Process monitoring checks are including pre-SSOP, SSOP, temperature, product, metal detector and equipment checks, label checks and hygiene rounds as well as checks at intake and at storage. Temperature is constantly monitored by the online monitoring system. Chilling and freezing controls

management is constantly verified (for further details see under 2 The Food Safety Plan – HACCP). Verified all these process controls during the audit round in production and during the vertical traceability check.

Examples of lists and checks seen include:
- PreSSOP lists for cutting on F-TIL-NL-10072v3 and expedition on F-TIL-NL-10066v3
- SSOP list packaging on F-TIL-NL-10121 and cutting F-TIL-NL-10076
- Metal detectors: F-TIL-NL-10064v3 and notification of findings on F-TIL-NL-10081v4
- Weight verification: F-TIL-NL-10114
- BBE verification: F-TIL-NL-10120v3
- Product verification: F-TIL-NL-10133v1

6.2 Labelling and pack control

No actual pre-printed packaging materials as all is printed on-line, except for stickers that are printed for products that are packed in crates. The system only prints label where necessary and when requested to do so by the operator that is assigning the quality of the product. The information to be printed is present in the system, as checked for the traceability test with regards to the shelf date. Important for this specific site is that labelling does not include any information with regards to allergens (as none are present) or ingredients (as the only ingredient used is beef). Main attention point for the labelling is name and shelf life, which have a lower criticality with regards to food safety, as issues can more easily be detected by the customer in case of issues. Labels are printed from the system ( ) based on the article number, which contains all the specific information. Seen labels of article Sirloin and article Hale. Labels include all necessary information. There is a daily verification of the correct functioning of the system and the readability of data. Important to know is that in this sector, all products can be produced every day, and sometimes in low numbers per article. A full check of every article every day is not feasible. There is no on-line verification system applied. Verified records of the verifications during the audit (production tour) on the one hand and on the other hand for the day of the production of the traceability test. There are no actual product changeovers, as all products are 'produced' simultaneously.

6.3 Quantity, weight, volume and number control

All products are sold by weight. Metrology verifies the balances for commercial purpose. No issues identified. Calibration of the scales is demonstrable. Apart from the calibration there also is a daily verification of the weighing scales with calibrated weights, as seen for the weighing scales before labelling.

6.4 Calibration and control of measuring and monitoring devices

A clear calibration plan is implemented. Calibration is mostly outsourced and is done at least once per year. When a device is outside specified limits, the outsourced company will adjust this. The company has a list of measuring equipment that is to be calibrated (F-TIL-NL-10048, last verification 05/01/2023). This includes items checked by the quality department. will hold items calibrated by the technical department. Main procedure is P-TIL-NL 10074v1.

Verified calibration records of metal detectors (22/04/22 – annual check), thermometers (and , both used for CCP measurement, dated 30/12/2022 and pT-100 of cooling cell E10 on 12/12/2022 - annual check), balances (21/02/23 - annual check), pH measuring equipment (27/02/23 – is done at a frequency of 2 weeks). These are all calibrated annually. All equipment is calibrated to a traceable, recognised standard. No non conforming trends, the calibrated equipment shows to be reliable.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
6.2.4.	No such equipment

7. Personnel

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

The company mainly uses external interim agencies that perform a first interview and general training and are announced through an intake form. All workers (including contracted workers) are trained via an introduction movie in Food defence. Principles of Food hygiene and food safety as well health and personal hygiene upon employment. They need to pass a test with a minimal score of 8/10. Should they fail, then they get a second attent, after reviewing the training. They are also given documents with regards to working with Vion, including machine-instructions. For the first weeks, they will need to wear a different color of haircap, so that they are easily recognisable. All personnel engaged in activities relating the production has followed relevant training, however competency reviewed are not planned, which means that they are done random (i.e. during internal audits) and consequently that not all personnel is reviewed (minor non-conformity). Further training is given once every year. Generall speaking, training is recorded in SAP, with the exception of specifically CCP linked training. There are annual evaluation between the hierarchy and the employee (as seen for . on 08/06/22) so that progress can be followed in the competency matrixes.

Training and monitoriging records checked from employees:
Repeat training HACCP sessions 15/11/22 and 11/11/22
Specific CCP training for and ., both 31/03/22
Introduction of new worker

Level of competence is demonstrated through staff interviews during the audit round, by means of explination given about the activities relating to control measures and critical control points.

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

Well detailed (all requirements of chapter 7.2 are included) hygiene rules (taken in document Good Business Practice) are documented. Rules are available in several relevant languages, such as Polish and Romanian. Correct use of blue plasters and storage of personal medicines observed and no remarks during the audit. Use of metal detectable plasters is applicable but not tested (see minor non-conformity).

Appropriate handwash facilities are available at the entrance to the production area by means of a hygiene sluice. A second minor non-conformity was seen for use of snoods on the one hand and the wearing of a watch on the other hand.

7.3 Medical screening

Medical screening of employees is done at the start and further every 5 years, as allowed by law. The hygiene rules indicate that when persons are infected with infectious diseases, they are not allowed to work in the production area. Hygiene rules are taken in the induction training and regularly repeated. Before entering the production area, a few questions are asked to visitors (medical questionnaire). Medicines are not allowed in the production area.

7.4 Protective clothing: employees or visitors to production areas
Protective clothing is in use. Protective clothing provided by the company in sufficient quantity. Each production employee has a set of several coats and trousers as protective clothes available. These clothes are changed daily or more frequent if needed. Protective clothing for visitors is supplied, coat, pants, disposable mob hats and boots. Visitors and external contractors sign for hygiene rules, and the correct application is also checked during (pre-)SSOP checks. Chain mail gloves and aprons are used, worn below the other protective clothing and are cleaned and disinfected daily. Laundry is contracted to [redacted], who are ISO 22000 certified for the scope of their services. Assessed in supplier evaluation. Home laundering is not permitted.

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
None	

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

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

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

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

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

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

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