



Audit Report

FSNS Beef Trim CCP Addendum

CS Beef Packers, LLC
17365 South Cole Road
Kuna, Idaho 83634

Audit Date: July 19, 2022
Auditor: Enma Marroquin



Audit Summary

Company Name:	CS Beef Packers, LLC	Company ID:	AUCAVKUN
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Definitions for the purpose of this Addendum:

Validation - Data that demonstrates there is a pathogen kill when an intervention is operating within specified parameters.

Verification - Demonstration of a microbiological reduction by an intervention when operating in validated parameter(s).

Monitoring - Checking / reading of intervention parameters / measurements (ex. Temperature, concentration, etc.).

PLEASE NOTE: A "NO" answer does not necessarily represent a deficiency in a facility's programs or processes.

Beef Trim - CCP Addendum

1 HACCP

		Result
1.1	Adequacy of the HACCP plan is reassessed by the establishment on an annual basis or whenever changes occur that could affect the hazard analysis or alter the HACCP plan. Review the establishment's HACCP reassessment log to identify the last reassessment.	Yes
Comment: HACCP reassessment was conducted on an annual basis at minimum or when changes occurred. Raw ground HACCP plan reassessment was conducted on 1-18-22. Fabrication and Slaughter HACCP plan was last reassessed on 7-13-22 as result of microbiological test results from 7-6-22.		
1.2	The establishment maintains records to demonstrate that responsible personnel have been trained in monitoring activities as described in their HACCP plan.	Yes
Comment: CCP Monitoring Procedure training was conducted on an annual basis or when changes were made, most recently on 6-1-22. Records from January through June 2022 demonstrated compliance. Competency was determined through daily direct observation of CCP monitoring activities.		
1.3	The establishment maintains records that confirm corrective actions are taken when there is a deviation from a critical limit.	Yes
Comment: Corrective actions for CCP Critical limit deviations were taken in accordance with 9 CFR 417.3. Records of root cause, corrective actions, and preventive measures was maintained. Records were reviewed from 6-23-22 which evidenced compliance.		

2 Interventions/Process Aids - Steam Vacuum

		Result
2.1	The establishment uses the steam vacuum intervention method.	Not Applicable
Comment: Steam vacuums were not used.		
2.2	The establishment identified this intervention as a CCP.	Not Applicable
Comment: Steam vacuums were not used.		
2.3	If the Steam Vacuum is a CCP, can the line run if this intervention is not operational or not in specification.	Not Applicable
Comment: Steam vacuums were not used.		
2.4.1	None	Not Applicable
Comment: None		
2.4.2	Validated Third Party Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not used.		
2.4.3	In-house Challenge Study or Validation Study	Not Applicable

Comment: Steam vacuums were not used.		
2.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	Not Applicable
Comment: Steam vacuums were not used.		
2.4.5	Resource white paper (Published Journal Article)	Not Applicable
Comment: Steam vacuums were not used.		
2.4.6	Resource white paper with third party review (peer reviewed paper - not published)	Not Applicable
Comment: Steam vacuums were not used.		
2.4.7	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not used.		
2.5.1	A specific set of samples were chosen to support the validation hypothesis (objective).	Not Applicable
Comment: Steam vacuums were not used.		
2.5.2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Not Applicable
Comment: Steam vacuums were not used.		
2.5.3	Scientific support documentation.	Not Applicable
Comment: Steam vacuums were not used.		
2.5.4	Validation study was prepared by a third party. List the name of the third party in comments.	Not Applicable
Comment: Steam vacuums were not used.		
2.5.5	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not used.		
2.6	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Not Applicable
Comment: Steam vacuums were not used.		
2.7.1	The establishment has documented procedures that include the following: Operation of this intervention method	Not Applicable
Comment: Steam vacuums were not used.		
2.7.2	Temperature monitoring	Not Applicable
Comment: Steam vacuums were not used.		
2.7.3	Vacuum monitoring	Not Applicable
Comment: Steam vacuums were not used.		
2.7.4	Steam pressure monitoring	Not Applicable
Comment: Steam vacuums were not used.		

2.7.5	Removal of contamination (Must follow regulatory guidelines of 'less than one inch')	Not Applicable
Comment: Steam vacuums were not used.		
2.7.6	Maintenance of the intervention equipment	Not Applicable
Comment: Steam vacuums were not used.		
2.7.7	Observation of the intervention in operation	Not Applicable
Comment: Steam vacuums were not used.		
2.7.8	None of the above.	Not Applicable
Comment: Steam vacuums were not used.		
2.8	Operators of the steam vacuum(s) are following documented procedures as written for this intervention. If no, list findings in comments.	Not Applicable
Comment: Steam vacuums were not used.		
2.9	The establishment's intervention operating parameters fall within the validation supporting documentation parameters	Not Applicable
Comment: Steam vacuums were not used.		

3 Interventions/Process Aids - Thermal Intervention

		Result
3.1	The establishment uses the Thermal (hot water or steam pasteurization) intervention method.	Yes
Comment: 180° F Hot water was used in the Pre Evisceration cabinet and Hot Water Pasteurization Cabinet.		
3.2	The establishment identified this intervention as a CCP.	Yes
Comment: Only the Hot Water Pasteurization Cabinet was identified as a CCP.		
3.3	If the Thermal (hot water or steam pasteurization) intervention is a CCP, can the line run if this intervention is not operational or not in specification.	Yes
Comment: The site had an in-house validation study to justify their ability to run the line, only if the Carcass Acid Cabinet (CCP) was operational.		
3.4.1	None	Not Applicable
Comment: N/A		
3.4.2	Validated Third Party Challenge Study or Validation Study	Yes
Comment: The site utilized FSNS to perform an In-Plant Validation of Antimicrobial Interventions Used for Reduction of <i>Escherichia coli</i> O157:H7 on Beef Carcasses and Beef Trim, dated July 13, 2022.		
3.4.3	In-house Challenge Study or Validation Study	Yes
Comment: Quarterly Process Validation for Anti Microbial Interventions, July 2022.		



3.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	Not Applicable
Comment: N/A		
3.4.5	Resource white paper (Published Journal Article)	Yes
Comment: Microbial Decontamination of Beef and Sheep Carcasses by Steam, Hot Water Spray Washes, and Steam Vacuum Sanitizer. Journal of Food Protection Vol. 59, No 2, Pages 127-135 (1996).		
3.4.6	Resource white paper with third party review (peer reviewed paper - not published)	No
Comment: None		
3.4.7	Other -- List in comments	No
Comment: None		
3.5.1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes
Comment: Defined samples sets were used to support the validation hypothesis.		
3.5.2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes
Comment: Mean Log Reduction of APC, EB, and ECC at a 95% confidence interval was used to support the validation hypothesis.		
3.5.3	Scientific support documentation.	Yes
Comment: Microbiological testing results were used to support the validation hypothesis.		
3.5.4	Validation study was prepared by a third party. List the name of the third party in comments.	Yes
Comment: The site utilized FSNS to perform an In-Plant Validation of Antimicrobial Interventions Used for Reduction of <i>Escherichia coli</i> O157:H7 on Beef Carcasses and Beef Trim, dated July 13, 2022.		
3.5.5	Other -- List in comments	Not Applicable
Comment: N/A		
3.6	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
Comment: Temperature probes were inserted into the flank, round, and clod of two carcass sides per period for surface temperature verification. One carcass out of 300 were sampled for Enterobacteriaceae and ECC in accordance with 9 CFR 310.25. CCP monitoring was conducted on an hourly basis for operational verification. Interventions were validated on a quarterly basis.		
3.7.1	Operation of this intervention method.	Yes
Comment: Operation of the Hot Water Cabinet was included in the preventive maintenance records.		
3.7.2	Training records for the maintenance of this intervention equipment.	Yes
Comment: Direct observation of set up procedures by maintenance management was conducted on a daily basis verifying compliance with preventive maintenance activities.		



3.7.3	Checking the nozzles to ensure that they are not plugged and that they are all functioning.	Yes
Comment: CCP monitoring procedures included review of the nozzles ensuring that they were functional.		
3.7.4	Checking the position of the arbors (are they moving correctly, or if stationary, are they aimed correctly).	Yes
Comment: Functional spray bar oscillation was verified as part of CCP monitoring procedures.		
3.7.5	Start-up and shut-down procedures.	Yes
Comment: Start up and Shut Down Procedures were included as part of the Preventive Maintenance Program.		
3.7.6	There is documentation of a monitoring process that assures that the water or steam is as least 160°F at the carcass surface.	Yes
Comment: Temperature probes were inserted into the flank, round, and clod of two carcass sides per period for surface temperature verification.		
3.7.7	The establishment monitors dwell time.	Yes
Comment: QA monitored and recorded dwell time once per day.		
3.7.8	The establishment ensures that all areas and/or surfaces of the carcass are adequately covered by water or steam.	Yes
Comment: CCP monitoring checks verified that complete carcass coverage was achieved.		
3.7.8	The establishment documents monitoring of start-up and shut-down.	Yes
Comment: Start up and Shut Down Procedures were included as part of the Preventive Maintenance Program. Work orders were reviewed from 6-23-22 demonstrating compliance.		
3.8	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	Yes
Comment: Operating parameters fell within the supporting validation parameters.		

4 Interventions / Process Aids -- Chemical Applications

		Result
4.1	The establishment uses Chemical Application(s) as an intervention method.	Yes
Comment: Interventions used were: Spray on the pattern lines (Lactic acid and ASC only) Acid Carcass spray cabinet (CCP) (Lactic acid, ASC, or PAA) Acid spray for Heads, hearts, kidneys and livers (CCP) (Lactic acid, ASC, or PAA) Acid spray prior to leaving the outtrail - after trimming (Lactic Acid and/or ASC only) Bromine in the carcass chill ASC and Lactic Acid could be used interchangeably on the trimmings, primals, and sub primals. Chemical interventions were used in accordance with FSIS Directive 7120.1 Safe and Suitable Listing.		



4.2 NOTE: Answer the following questions for each designated CCP. Yes

The establishment identified this intervention as a CCP.
If YES, identify the location of the application (ex. Post-evis lactic acid).

Comment: Acid Cabinet Carcass spray (CCP) - Hide off
Lactic acid for Heads, hearts, kidneys and livers (CCP) - Hide off

List each intervention chemical (ex. Lactic acid, peracetic acid, chlorine, Sanova, SYNTRx) being utilized and the location of use. Verify that the establishment has FSIS Regulatory approval or other record of approval for the chemical(s) in use. Identify CCPs with parentheses.

Chemical Interventions used were:
 Spray on the pattern lines (Lactic acid and ASC only) - Hide removal
 Acid Carcass spray cabinet (CCP) (Lactic acid, ASC, or PAA) - Hide off
 Acid spray for Heads, hearts, kidneys and livers (CCP) (Lactic acid, ASC, or PAA) - Hide off
 Acid spray prior to leaving the outtrail - after trimming (Lactic Acid and/or ASC only) - Hide off
 Bromine in the carcass chill - Chillers
 ASC and Lactic Acid could be used interchangeably on the trimmings, primals, and sub primals.
 Chemical interventions were used in accordance with FSIS Directive 7120.1 Safe and Suitable Listing.

4.3 If the Chemical Application is a CCP, can the line run if this intervention is not operational or not in specification. Yes

Comment: The production line could be operational as long as the Hot Water Pasteurization Cabinet (CCP) was operational.
The production line could be operational if the Head/Heart/Kidney/Liver cabinet was not operational as long as the alternative of hand pump sprayer was implemented.

4.4.1 None Not Applicable

Comment: N/A

4.4.2 Validated Third Party Challenge Study or Validation Study Yes

Comment: The site utilized FSNS to perform an In-Plant Validation of Antimicrobial Interventions Used for Reduction of *Escherichia coli* O157:H7 on Beef Carcasses and Beef Trim, dated July 13, 2022.

4.4.3 In-house Challenge Study or Validation Study Yes

Comment: Quarterly Process Validation for Anti Microbial Interventions, July 2022.

4.4.4 Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments. No

Comment: None

4.4.5 Resource white paper (Published Journal Article) Yes

Comment: Efficacy of washing meat surfaces with 2% levulinic, acetic, or lactic acid for pathogen decontamination and residual growth inhibition. Journal of Meat Science 88 (2011) pgs. 256-260.

4.4.6 Resource white paper with third party review (peer reviewed paper - not published) No

Comment: None

4.4.7 Other -- List in comments No

Comment: None



1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes
Comment: Defined samples sets were used to support the validation hypothesis.		
2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes
Comment: Mean Log Reduction of APC, EB, and ECC at a 95% confidence interval was used to support the validation hypothesis.		
3	Scientific support documentation.	Yes
Comment: Microbiological testing results were used to support the validation hypothesis.		
4	Validation study was prepared by a third party. List the name of the third party in comments.	Yes
Comment: The site utilized FSNS to perform an In-Plant Validation of Antimicrobial Interventions Used for Reduction of <i>Escherichia coli</i> O157:H7 on Beef Carcasses and Beef Trim, dated March 29, 2021.		
5	Other -- List in comments	Not Applicable
Comment: Other - List in comments		
4.5.1	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
Comment: One carcass swab was collected out of 300 carcasses produced in accordance with 9 CFR 310.25. CCP monitoring was conducted on an hourly basis for operational verification. Interventions were validated on a quarterly basis.		
1	The establishment has documented procedures that include the following: Operation of this intervention method, including application of the treatment	Yes
Comment: Procedures were in place for the operation of the interventions used and the application methods.		
2	Preparation of the treatment solution(s)	Yes
Comment: Preparation of the treatment solution was included in CCP monitoring procedures.		
3	Start up of the intervention equipment	Yes
Comment: Start up of the chemical interventions was defined in the preventive maintenance program.		
4	Shut down of the intervention equipment	Yes
Comment: Shut down of the chemical interventions was defined in the preventive maintenance program.		
4.6.1	The establishment monitors and has set lower limits on the concentration of the treatment solution. Specify in the comments if TITRATION or CONDUCTIVITY is used to monitor the solution concentration.	Yes



Comment: Critical Limits for the Lactic Acid were 2% to 5% and monitored through titration, Limits for the hypobromous acid were 75 ppm 900 ppm monitored through conductivity, and limits for ASC were 500 ppm to 1200 ppm monitored through titration.

4.6.2 The establishment monitors the temperature of the treatment solutions. Yes

Comment: Temperature of the acids were monitored during CCP monitoring activities. Temperatures were not monitored for the ASC.

4.6.3 The establishment monitors the flow / volume Yes

Comment: Flow was monitored for ASC only.

4.6.4 The establishment monitors the nozzle pressure. Yes

Comment: Nozzle pressure was monitored during CCP monitoring checks; limits were 10-30psi.

4.6.5 The establishment ensures all areas and/or surfaces of the carcass are adequately covered by the chemical application. Yes

Comment: Adequate carcass surface coverage was verified each production hour by visual inspection.

4.6.6 The intervention method is implemented as written in the documented procedure. Yes

Comment: Intervention method was observed implemented according to company procedures.

4.7 The establishment's intervention operating parameters fall within the validation supporting documentation parameters. Yes

Comment: Operating parameters were observed within supporting validation parameters.

4.8.1 Is / Are there alternative intervention methods(s) being utilized other than those listed in the previous pages No

Comment: Alternative intervention methods were not being utilized.

5 Dressing Procedures / Critical Job Tasks

		Result
5.1	Is there an intervention or process aid utilized upon entering or exiting the out rail.	Yes
Comment:	Lactic Acid and/or ASC was applied to carcass sides by handheld sprayer upon leaving the outtrail.	
5.2	The establishment designates and has documented descriptions of critical job tasks (i.e., skinning line, evisceration, etc.).	Yes
Comment:	Job Descriptions were developed for critical job tasks. Reviewed job descriptions for Outtrail Trimmers, Gutters, and Legger.	
5.3	The establishment uses hot water or chemical solution to sanitize equipment (i.e., knife, steel, hook, etc.) during operations.	Yes
Comment:	180° F water or Chlorine Sanitizer (50ppm-200ppm) was used to sanitize equipment after trimming contamination.	



5.4.1	<p>The establishment uses the following to ensure that knives are in the sanitizer dip long enough to sanitize: List which methods are utilized in which process i.e. multiple knife rotation on skinning line, 1-2 second dip post skinning, etc.</p> <p>Knife blade stays in the dip 1-2 seconds.</p>	Yes
<p>Comment: Facility was conducting multiple knife rotation from sticking to evisceration. Post-hide removal, a 4 to 6 second dip was utilized.</p>		
5.4.2	<p>Knife blade stays in the dip 2-3 seconds.</p>	Not Applicable
<p>Comment: Not Applicable</p>		
5.4.3	<p>Knife blade stays in the dip for 4-6 seconds.</p>	Yes
<p>Comment: Facility was conducting multiple knife rotation from sticking to evisceration. Post-hide removal, a 4 to 6 second dip was utilized.</p>		
5.4.4	<p>Multiple knife rotation.</p>	Yes
<p>Comment: Facility was conducting multiple knife rotation from sticking to evisceration.</p>		
5.5	<p>The establishment sanitizes all equipment (hooks and knives) between each use to reduce cross contamination in the process when trimming visible contamination (i.e., fecal, hair, or dirt.).</p>	Yes
<p>Comment: Equipment was sanitized with 180° F water after trimming visible contamination. This was also outlined in specific job descriptions.</p>		
5.6	<p>There is an auditing / observation process for monitoring of critical job tasks</p>	Yes
<p>Comment: Verification of Sanitary Dressing Procedures Audit was conducted at a minimum once per hour for critical areas of the skinning line. Monitoring forms included corrective actions taken for deficiencies.</p>		
5.7.1	<p>Type(s) of monitoring at the establishment:</p>	Yes
<p>Auditor</p>		
<p>Comment: Sanitary Dressing Procedures audit was conducted once per hour for critical areas of the skinning line. Monitoring forms included corrective actions taken for deficiencies.</p>		
5.7.2	<p>Supervisor</p>	Yes
<p>Comment: Supervisors were present on the line monitoring Sanitary Dressing Procedures. Audits were not documented.</p>		
5.7.3	<p>Video</p>	No
<p>Comment: Video monitoring was conducted.</p>		
5.7.4	<p>Other -- List in Comments</p>	Not Applicable
<p>Comment: None.</p>		
5.8	<p>The Auditor declares that he/ she does not have a conflict of interest with this auditee and the audit has been carried out independently and impartially.</p>	Yes
<p>Comment: I, Enma Marroquin, did not have a conflict of interest with this auditee.</p>		