



Audit Report

Specified Risk Material Audit

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
Address:	17365 South Cole Road Kuna, Idaho 83634		

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Audit ID:	AO-003983
Audit Date:	July 19, 2022
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Enma Marroquin
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** Requirements identified by asterisks denote an Automatic Failure if found Non-Compliant **

An Audit Failure requires a re-audit in 60 days.



Specified Risk Material Audit

1 Downers

		Result
1.1	<p>No Downers: a 'downer' is considered to be an animal that does not walk into the restrainer or knocking -box on its own accord. Meat from a downer animals is not permitted to enter the facility. If an animal goes down after passing ante mortem inspection, it is not allowed into production. Disposal of these animals must be in accordance with 9 CFR 309.13.</p> <p>Confirm documented policies / programs exist which:</p> <ul style="list-style-type: none"> (i) Correctly define a downer, and (ii) Adequately describe how downers are handled to ensure they are excluded from production. <p>Comment: Non ambulatory and Antemortem Condemned Cattle Procedure defined non-ambulatory animals were animals that were not able to rise from a recumbent position. USDA FSIS personnel were notified for antemortem inspection and disposition of the animal. Animals were timely euthanized, verified for insensibility, pithed, denatured, and transported to a secured pen in the unloading area out of public sight.</p>	Compliant
1.2	<p>Inspect all pens to see if downers are present. If downers are present, observe that proper disposition is occurring and appropriate documentation is being completed.</p> <p>Comment: Downers were not present in pens.</p>	Compliant
1.3	<p>Determine if records are available to confirm compliance with this requirement through the documentation of downers and their subsequent disposition.</p> <p>Comment: Animals euthanized on trailers, DOAs, and animals euthanized on pens were documented on the Condemned Log including back tag number and reason. Records for downers were reviewed from April through July 2022 and demonstrated compliance. Site maintained a Euthanization Verification Form that also included documentation of animals being euthanized after being received at the site. Records were provided for review from April 2022 through the date of the assessment.</p>	Compliant

2 Stunning

		Result
2.1	<p>Captive bolt stunners that deliberately inject compressed air into the cranium at the end of the penetration cycle shall not be used to stun cattle per 9 CFR 313.5(b)(2)(ii).</p> <p>Verify that air injection stunning is not being performed.</p> <p>Comment: Jarvis pneumatic stunners were used as the primary stunning method and .25 caliber handheld captive bolt guns were used as back up. Air injection stunning was not performed.</p>	Compliant

3 Age Identification

Result

- 3.1** Identification of the age (30 months or older) of the carcass / animal is performed by either dentition or records. If age is not determined, then all carcasses/animals are treated as over 30 months. Compliant

Confirm:

- (i) Documented procedures exist for the identification and segregation of carcasses / animals identified as over 30 months by dentition or records, and
- (ii) Operating practices are consistent with these procedures.

Comment: SL SOP 4 Dentition stated requirements for determination of cattle age using dentition. Under 30 month animals received were evaluated and under thirty month animals were provided a blue tag. Animals were provided a tag at the scale indicating age and were segregated in the carcass cooler. Observed practices were consistent with procedure.

4 SRM Removal/Segregation/Disposition

Result

- 4.1** Facility has established procedures to ensure complete removal, segregation, and disposition of Specified Risk Material (SRM) from edible products. Compliant
- SRM are defined as brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column (except the vertebrae of the tail, transverse processes of the thoracic and lumbar vertebrae and wings of the sacrum), dorsal root ganglia (DRG) from cattle 30 months or older; tonsils and distal ileum of small intestines from cattle of all ages. (9 CFR 310.22(a)).

Confirm:

- (i) Documented procedures exist for the removal of all defined SRM, and
- (ii) Operator practices are consistent with these procedures.

Comment: SRM Removal procedures identified SRMs as the brain, skull, eyes, trigeminal ganglia, spinal cord, dura matter, dorsal root ganglia, tonsils, and distal ileum from cattle of all ages. Skulls were split, brain removed through vacuum, and sent to onsite rendering. Spinal cord, dura matter, and dorsal root ganglia were observed removed through dedicated spinal vacuum. Tonsils were removed through knife excision below the tonsils. Distal ileum was removed through auger to onsite rendering. Dedicated equipment and sterilizers were used for the removal of SRMs. Operator practices were observed in compliance with company procedures.

5 BSE Tested Animals

Result

- 5.1** Animals that are tested for BSE are not utilized unless a negative test result is obtained. Compliant

Confirm segregation and/or hold procedures (e.g., positive release) exist for all BSE test animals.

Comment: Non ambulatory and Antemortem Condemned Cattle Procedure stated that BSE tested cattle were selected by USDA FSIS, humanely stunned, and removed from the site. BSE testing had not occurred since the last third party audit.



5.2 Segregation procedures are identified to minimize the potential for cross - contamination by animals that enter the facility if they have been tested for BSE. Compliant

Ensure (i) carcasses are clearly identified and segregated in the chiller (cooler), (ii) all other parts of the animal are identified and segregated, and (iii) traceability / disposition records are available for BSE test animals.

Comment: Non ambulatory and Antemortem Condemned Cattle Procedure stated that BSE tested cattle were selected by USDA FSIS, humanely stunned, and removed from the site. BSE testing had not occurred since the last third party audit.

6 Cross Contamination Prevention

		Result
6.1	<p>Programs exist to prevent cross contamination by SRM from carcass to carcass during production.</p> <p>Confirm: (i) Documented procedures exist prescribing the use of clean (removal of all visible organic debris adhering to the equipment prior to sanitization) and sanitized (use of 180°F water) OR visibly distinguishable dedicated tools / equipment for the removal of SRMs, and (ii) Operator practices are consistent with these procedures. Tools and equipment used to remove SRMs shall not be used on edible tissue.</p> <p>Comment: SRM Removal Program stated that dedicated sterilizers and equipment were used for the removal of SRM. Operators were observed in compliance with company procedures. SRM removal equipment was not observed being used on edible tissues. Dedicated over thirty month and under thirty month tools were utilized.</p>	Compliant

6.2	<p>Confirm: (i) Documented procedures exist prescribing the use of dedicated sterilizers at all SRM removal stations, and the cleaning of split saw(s) between carcasses at a frequency sufficient to prevent build-up of debris and/or the internal split saw housing is maintained with 180°F water, and (ii) Operator practices are consistent with these procedures.</p> <p>Comment: Per policy, dedicated sterilizers were present at SRM removal stations. Split saws had 180° F water running through the saw. Stands had dedicated dip tanks for sterilizing the saw between carcasses. Between over thirty and under thirty month carcasses, the split saw housing was opened, cleaned with 180° F water and inspected for visible debris. Operator practices were in compliance with company procedures.</p>	Compliant
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7 Training

		Result
7.1	<p>Employees responsible for all SRM related activities are adequately trained.</p> <p>Confirm: (i) Employee training and competency, (ii) Adequacy of training program, and (iii) Training records.</p>	Compliant



Comment: Training was conducted at new hire orientation and during annual refresher training on Slaughter SRM Job Positions including each position. Records from 2022 were demonstrated compliance. Competency was assessed through observation.

8 SRM Removal and Disposal

		Result
8.1	SRM is removed as potential source of contamination and disposed of according to 9 CFR 310.22(e).	Compliant
	Confirm: (i) All SRM is properly labeled, segregated, and disposed of, and (ii) Records are available to verify ongoing compliance.	
	Comment: SRM was collected into a dedicated tote or in a color coded red container. Containers were physically collected and placed into the dedicated container for removal to landfill. Invoices were available for removal of SRM; records from 2022 demonstrated removal.	

9 Mis-splits

		Result
9.1	Missplits are treated as potential sources of SRM introduction into food chain.	Compliant
	Confirm: (i) Documented procedures exist describing how missplits of the vertebral column are identified and handled to ensure removal of SRM, and (ii) Operator practices are consistent with these procedures.	
	Comment: Procedures explained, mis-split carcasses were tagged with a purple tag indicating a closed loop vertebrae. Mis-splits were corrected with dedicated white handled knife and hook on the line or in the carcass rail out area. Operator practices were observed in compliance with company procedures.	

10 Verification of SRM Removal

		Result
10.1	Verification of SRM removal section. Line speed 300 head / hour or greater observe 100 sides; if line speed is less than 300 head / hour observe 50 sides.	Compliant
	Tonsil removal - palatine and lingual from carcasses of all ages. Lingual tonsils may be removed via hand knife trimming or use of a skinning machine, (slaughter)	
	Comment: Tonsils were removed through knife excision.	
10.2	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)	Compliant
	Comment: Skulls were split, brains removed through vacuum, and sent to onsite rendering. Spinal cord, dura matter, and dorsal root ganglia were observed removed through dedicated spinal vacuum.	

10.3 **Vertebral column - except the vertebrae of the tail, transverse processes of the thoracic and lumbar vertebrae, and wings of the sacrum in carcasses 30 months and older, (fabrication)**
Compliant
Observe all regions of the vertebral column on the bone belt for 10 minutes.

Comment: A ten minute review of the bone belt was performed without findings of spinal cord.

10.4 **In the carcass chiller or staging area prior to fabrication, observe the identified and segregated 30 and older carcasses for absence of spinal cord, (cooler)**
Compliant

Comment: The site did not have any OTM carcasses available at the time of the assessment. Of the 100 UTM carcass sides evaluated, spinal cord was not observed.

11 Distal Ileum Removal

Result

11.1 Verify the measurement by observing the facility perform their verification check.
Not Applicable

Distal ileum of the small intestines from carcasses of all ages. Distal ileum is removed by a procedure that removes at least 80 inches of the uncoiled and trimmed small intestine as measured from the ceco-colic junction and progressing proximally towards the jejunum or by a procedure that the establishment demonstrates is effective in ensuring complete removal of the distal ileum, (slaughter)

Comment: Intestines were not saved.

12 Whizzard Knives

Result

12.1 Whizzard knives used to trim all vertebral regions must have a blade that is ≥ 2 inches in diameter. Disarticulation of the individual vertebra is not permitted.
Not Applicable

Confirm the whizzard knives used for this task are of proper size.

Comment: Whizzard knives were not used for collection of meat from vertebral bones.

13 Mechanically Separated Meat

Result

13.1 Mechanically separated meat (MSM) is not performed at the facility or used in production of human food (9 CFR 319.5).
Not Applicable

Observe to see if MSM is being produced.

Comment: MSM was not produced.

13.2 If these materials are being produced, verify that documented procedures and production segregation is adequate to ensure no MSM Product can potentially be introduced into human food.
Not Applicable

Comment: MSM was not produced.

14 Shipping



Result

- 14.1** If the facility ships beef carcasses or parts that contain vertebral columns from cattle 30 months of age and older to another federally inspected establishment, a program is in place that meets the requirements set forth in 9 CFR 310.22 (g).

Compliant

Confirm:

- (i) Documented procedures exist for applying control to the shipping over 30 month products containing vertebral column from the facility,
- (ii) Operating practices are consistent with these procedures, and
- (iii) Documentation or records of these events is maintained.

Comment: Cow Chuck Supplier Certificate of Analysis documented the shipment details and carcass identification numbers for over 30 month bone-in chuck quarters sent for further processing at another facility. Further processing facility provided completed forms indicating vertebral columns were removed and disposed appropriately. Practices were found consistent with company procedures.

15 Self Audits

Result

- 15.1** A program detailing the self auditing procedures used by the facility to verify the removal and disposal of the SRMs exists and is implemented.

Compliant

Confirm:

- (i) Documented procedures exist for the self auditing program,
- (ii) Operating practices are consistent with these procedures, and
- (iii) Documentation or records of these events is maintained.

Comment: SRM Checks reviewed five carcasses once per hour verifying presence of brain leakage, head drop, tonsil removal, spinal cord removal, small intestine, head table compliance, cleaning of the split saws, and verification that SRMs were properly disposed. SRM Checks Fabrication reviewed twenty sides hourly for proper removal of spinal cord, five minutes of the bone belt, verification of chuck, and proper disposal. Records were provided for review and demonstrated compliance.

16 Feed Ban

Result

- 16.1** A program is in place to obtain letters from the feedlots or feeders regarding the exclusion of prohibited animal proteins in ruminant feed per 21 CFR 589.2000.

Compliant

Confirm:

- (i) Documented procedures exist for obtaining necessary documentation from the feedlots/feeders, and
- (ii) Documentation or records of these events is maintained. Verify at least 3 different feedlots/feeders letters are on file from current day's cattle line up.

Comment: Producer's Wholesomeness Certificates were signed by haulers acknowledging that cattle were not fed feed containing ruminant components in accordance with 21 CFR 589.2000. Certificates were required to be updated every three years at minimum. Three certificates for the current cattle lineup demonstrated compliance.



17 Conflict of Interest

Result

17.1 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.

Yes

Comment: I, Enma Marroquin, did not have a conflict of interest with this auditee.