



Audit Report

FSNS Beef Trim CCP Addendum

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

Audit Date: August 29, 2023
Auditor: Michael Sanders



Audit Summary

Company Name:	CS Beef Packers, LLC	Company ID:	AUCAVKUN
Address:	17365 South Cole Road Kuna, Idaho 83634		

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Audit Type:	Annual audit
Audit Result:	Completed

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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 plans were reassessed annually at a minimum or as necessary for process changes. The most recent reassessments were 1/26/23 for the slaughter and grind plans and 1/9/23 for the fabrication plan.		
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 monitors were trained upon assignment and annually thereafter. CCP training records dated June - August 2023 were available for slaughter CCP monitors, and records dated April through August 2023 were available for fabrication CCP monitors.		
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 were taken per 9 CFR 417.3 for CCP deviations. Corrective actions were reviewed for a CCP failure which occurred on 5/23/23, that were consistent with requirements of 9 CFR 417.3.		

2 Interventions/Process Aids - Steam Vacuum

		Result
2.1	The establishment uses the steam vacuum intervention method.	Not Applicable
Comment: Steam vacuums were not utilized.		
2.2	The establishment identified this intervention as a CCP.	Not Applicable
Comment: Steam vacuums were not utilized.		
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 utilized.		
2.4.1	None	Not Applicable
Comment: Steam vacuums were not utilized.		
2.4.2	Validated Third Party Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not utilized.		
2.4.3	In-house Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not utilized.		

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 utilized.		
2.4.5	Resource white paper (Published Journal Article)	Not Applicable
Comment: Steam vacuums were not utilized.		
2.4.6	Resource white paper with third party review (peer reviewed paper - not published)	Not Applicable
Comment: Steam vacuums were not utilized.		
2.4.7	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not utilized.		
2.5.1	A specific set of samples were chosen to support the validation hypothesis (objective).	Not Applicable
Comment: Steam vacuums were not utilized.		
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 utilized.		
2.5.3	Scientific support documentation.	Not Applicable
Comment: Steam vacuums were not utilized.		
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 utilized.		
2.5.5	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not utilized.		
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 utilized.		
2.7.1	The establishment has documented procedures that include the following: Operation of this intervention method	Not Applicable
Comment: Steam vacuums were not utilized.		
2.7.2	Temperature monitoring	Not Applicable
Comment: Steam vacuums were not utilized.		
2.7.3	Vacuum monitoring	Not Applicable
Comment: Steam vacuums were not utilized.		
2.7.4	Steam pressure monitoring	Not Applicable
Comment: Steam vacuums were not utilized.		
2.7.5	Removal of contamination (Must follow regulatory guidelines of 'less than one inch')	Not Applicable

Comment: Steam vacuums were not utilized.

2.7.6	Maintenance of the intervention equipment	Not Applicable
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Comment: Steam vacuums were not utilized.

2.7.7	Observation of the intervention in operation	Not Applicable
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Comment: Steam vacuums were not utilized.

2.7.8	None of the above.	Not Applicable
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Comment: Steam vacuums were not utilized.

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
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Comment: Steam vacuums were not utilized.

2.9	The establishment's intervention operating parameters fall within the validation supporting documentation parameters	Not Applicable
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Comment: Steam vacuums were not utilized.

3 Interventions/Process Aids - Thermal Intervention

		Result
3.1	The establishment uses the Thermal (hot water or steam pasteurization) intervention method.	Yes
Comment:	The site used hot water pasteurization on carcasses pre-evisceration and the final carcass wash.	
3.2	The establishment identified this intervention as a CCP.	Yes
Comment:	The final hot water pasteurization cabinet was an either/or CCP in conjunction with lactic acid, or peroxyacetic acid, or acidified sodium chlorite. During this assessment, the site was utilizing lactic acid as the 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 line could run without hot water pasteurization if a chemical intervention was utilized.	
3.4.1	None	Not Applicable
3.4.2	Validated Third Party Challenge Study or Validation Study	No
3.4.3	In-house Challenge Study or Validation Study	Yes
Comment:	2023 Process Validation - CS Beef 5/15/2023 - 5/17/2023	
3.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	No
3.4.5	Resource white paper (Published Journal Article)	Not Applicable
3.4.6	Resource white paper with third party review (peer reviewed paper - not published)	Not Applicable
3.4.7	Other -- List in comments	Not Applicable
3.5.1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes

Comment: Sets of 10 carcasses were chosen for the studies.		
3.5.2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes
Comment: Log reduction of APC, coliforms, and generic <i>E. coli</i> were used to support the conclusion.		
3.5.3	Scientific support documentation.	Yes
Comment: Microbiological test results supported the conclusion.		
3.5.4	Validation study was prepared by a third party. List the name of the third party in comments.	No
3.5.5	Other -- List in comments	Not Applicable
3.6	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
Comment: On-going verifications included sampling one out of every 300 head harvested for generic <i>E. coli</i> , quarterly process validations which consisted of sampling carcass pre and post interventions, and CCP/pre-requisite program monitoring of operating parameters.		
3.7.1	Operation of this intervention method.	Yes
Comment: Operation procedures were in the CHAD cabinet owner's manual.		
3.7.2	Training records for the maintenance of this intervention equipment.	Yes
Comment: Maintenance training records included procedures for maintaining the cabinet.		
3.7.3	Checking the nozzles to ensure that they are not plugged and that they are all functioning.	Yes
Comment: Nozzle function was verified during hourly CCP monitoring.		
3.7.4	Checking the position of the arbors (are they moving correctly, or if stationary, are they aimed correctly).	Yes
Comment: Arbor position was verified during hourly CCP monitoring.		
3.7.5	Start-up and shut-down procedures.	Yes
Comment: Start up and shut down procedures were in the CHAD owner's manual.		
3.7.6	There is documentation of a monitoring process that assures that the water or steam is at least 160°F at the carcass surface.	Yes
Comment: Once per period a surface probe was attached to a carcass passing through the cabinet to verify carcass surface temperature.		
3.7.7	The establishment monitors dwell time.	Yes
Comment: Dwell time was monitored during the once per period carcass surface temperature test.		
3.7.8	The establishment ensures that all areas and/or surfaces of the carcass are adequately covered by water or steam.	Yes
Comment: Carcass coverage was monitored during hourly CCP monitoring.		
3.7.8	The establishment documents monitoring of start-up and shut-down.	Yes



Comment: Start up and shut down were monitored during preventive maintenance tasks.

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

Comment: Operating procedures were within validation parameters. Water temperature was 207°F, pressure was 15 psi, and arbors functioned properly.

4 Interventions / Process Aids -- Chemical Applications

		Result
4.1	The establishment uses Chemical Application(s) as an intervention method.	Yes
4.2	NOTE: Answer the following questions for each designated CCP. The establishment identified this intervention as a CCP. If YES, identify the location of the application (ex. Post-evis lactic acid).	Yes
Comment:	Lactic acid applied to carcasses post hot water pasteurization was the CCP currently in use.	
	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.	
	The site had validation to use acidified sodium chlorite, lactic acid, or peroxyacetic acid interchangeably. Lactic acid was applied prior to carcasses immediately prior to chilling (CCP in use). PAA was applied to carcasses post final hot water pasteurization, on carcasses post hide removal, in the pre-evisceration hot water pasteurization cabinet, and on carcasses railed in from the out rail. Hypobromus acid was applied to carcasses in the spray chill.	
4.3	If the Chemical Application is a CCP, can the line run if this intervention is not operational or not in specification.	No
Comment:	The line could not run without a chemical intervention post hot water pasteurization.	
4.4.1	None	Not Applicable
4.4.2	Validated Third Party Challenge Study or Validation Study	No
4.4.3	In-house Challenge Study or Validation Study	Yes
Comment:	2023 Process Validation - CS Beef 5/15/2023 - 5/17/2023	
4.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	No
4.4.5	Resource white paper (Published Journal Article)	No
4.4.6	Resource white paper with third party review (peer reviewed paper - not published)	No
4.4.7	Other -- List in comments	Not Applicable
1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes
Comment:	Sets of 10 carcasses were chosen for the studies.	
2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes

Comment: Log reduction of APC, coliforms, and generic *E. coli* were used to support the conclusion.

3	Scientific support documentation.	Yes
Comment: Microbiological test results supported the conclusion.		
4	Validation study was prepared by a third party. List the name of the third party in comments.	No
5	Other -- List in comments	Not Applicable
4.5.1	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
Comment: On-going verifications included sampling one out of every 300 head harvested for generic <i>E. coli</i> , quarterly process validations which consisted of sampling carcass pre and post interventions, and CCP/pre-requisite program monitoring of operating parameters.		
1	The establishment has documented procedures that include the following: Operation of this intervention method, including application of the treatment	Yes
Comment: Preventive maintenance instructions included operation instructions.		
2	Preparation of the treatment solution(s)	Yes
Comment: Preventive maintenance instructions included preparation of treatments.		
3	Start up of the intervention equipment	Yes
Comment: Preventive maintenance instructions included startup requirements.		
4	Shut down of the intervention equipment	Yes
Comment: Preventive maintenance instructions included shut down requirements.		
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: Titration was utilized to verify concentration. Lower limits were established.		
4.6.2	The establishment monitors the temperature of the treatment solutions.	Yes
Comment: Temperature was monitored during hourly CCP monitoring.		
4.6.3	The establishment monitors the flow / volume	No
Comment: Flow or volume were not monitored.		
4.6.4	The establishment monitors the nozzle pressure.	Yes
Comment: Nozzle pressure was monitored during hourly CCP monitoring.		
4.6.5	The establishment ensures all areas and/or surfaces of the carcass are adequately covered by the chemical application.	Yes
Comment: Coverage was verified during hourly CCP monitoring.		
4.6.6	The intervention method is implemented as written in the documented procedure.	Yes
Comment: The intervention was implemented per the written procedure.		

4.7	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	Yes
Comment:	Concentration, temperatures, pressure, and application were 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:	Novel interventions were not 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:	PAA and lactic acid were applied to carcasses railed back in from the out rail.	
5.2	The establishment designates and has documented descriptions of critical job tasks (i.e., skinning line, evisceration, etc.).	Yes
Comment:	SOP SL 16 Slaughter Job Positions defined critical job tasks.	
5.3	The establishment uses hot water or chemical solution to sanitize equipment (i.e., knife, steel, hook, etc.) during operations.	Yes
Comment:	Hot (180°F) water was utilized to sanitize equipment during operations.	
5.4.1	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.	Yes
	Knife blade stays in the dip 1-2 seconds.	
Comment:	A 1-2 second dip was used for post hide removal trimming tasks.	
5.4.2	Knife blade stays in the dip 2-3 seconds.	No
5.4.3	Knife blade stays in the dip for 4-6 seconds.	No
5.4.4	Multiple knife rotation.	Yes
Comment:	Multiple knife rotation was used at each hide removal position.	
5.5	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.).	Yes
Comment:	Equipment was sanitized between carcasses or after trimming visible contamination.	
5.6	There is an auditing / observation process for monitoring of critical job tasks	Yes
Comment:	SQA 15 Sanitary Dressing SOP consisted of monitoring each slaughter position hourly.	
5.7.1	Type(s) of monitoring at the establishment:	Yes
	Auditor	



Comment: FSQA staff monitored sanitary dressing on an hourly basis and recorded observations in data collection software.

5.7.2	Supervisor	No
5.7.3	Video	No
5.7.4	Other -- List in Comments	Not Applicable
5.8	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, Michael Sanders, do not have a conflict of interest with this auditee.