



# Audit Report

## Specified Risk Material Audit

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

**Audit Date:** July 16, 2024  
**Auditor:** Rudy Hernandez



## Audit Summary

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

Contact Name:	Brandy Whitehead
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Audit ID:	AO-008705
Audit Date:	July 16, 2024
Audit Type:	Unannounced
Audit Result:	Passed

Auditor Name:	Rudy Hernandez
Auditor Phone Number:	970-405-0369
Auditor Email Address:	rudy.hernandez@fsns.com

\*\* 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

<b>1</b>	Downers	
<b>1.1</b>	<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:            (i) Correctly define a downer, and            (ii) Adequately describe how downers are handled to ensure they are excluded from production.</p>	Compliant
<p>Comment: Downers were identified in the Animal Welfare program as an animal that could not rise or walk under its own power. Downers were euthanized, bled, denatured, and sent to offsite technical rendering.</p>		
<b>1.2</b>	<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>	Compliant
<p>Comment: Downers were not present during this assessment.</p>		
<b>1.3</b>	<p>Determine if records are available to confirm compliance with this requirement through the documentation of downers and their subsequent disposition.</p>	Compliant
<p>Comment: Invoices and landfill weight tickets for downer removal and disposal were available indicating compliance.</p>		

### 2 Stunning

<b>2</b>	Stunning	
<b>2.1</b>	<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>	Compliant
<p>Comment: Air injected stunning was not utilized. The site used captive bolt stunning.</p>		

### 3 Age Identification

<b>3</b>	Age Identification	
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**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: Animals were considered 30 months or older unless received as a 'young' lot. Dentition was conducted on young lots. A blue tag was applied to carcasses identified as less than 30 months by dentition and such was indicated on the carcass identification tag. Less than 30-month old cattle were held on separate rails. These procedures were documented in SL SOP 5. Observed practices were consistent with written requirements.

## 4 SRM Removal/Segregation/Disposition

**4** SRM Removal/Segregation/Disposition

**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: SL SOP 5 explained procedures for SRM removal, segregation, and disposition for each SRM related position. The vertebral column was removed by knife trimming and sent to inedible rendering. Dorsal root ganglia were removed by chine saw and sent to inedible rendering. Spinal cord and brain were removed by vacuum and disposed to the landfill. Eyes and trigeminal ganglia remained in the skull and were disposed to inedible rendering. Tonsils were removed by knife trimming and sent to inedible rendering. Observed practices were consistent with written procedures.

## 5 BSE Tested Animals

**5** BSE Tested Animals

**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: If an animal was tested for BSE, the animal was euthanized in the pens, the head removed for sampling, and the carcass disposed to offsite technical rendering.



**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: If an animal was tested for BSE, the animal was euthanized in the pens, the head removed for sampling, and the carcass disposed to offsite technical rendering.

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## 6 Cross Contamination Prevention

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**6.1** Programs exist to prevent cross contamination by SRM from carcass to carcass during production. Compliant

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.

Comment: SL SOP 5 required dedicated equipment at SRM removal stations. Black handled knives were used on edible tissue. White handled knives were used to disarticulate the spinal cord, and to remove tonsils. Tools used to incise, sever, or remove SRMs were sanitized in 180°F water after each carcass. Observed practices were consistent with written procedures.

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**6.2** Confirm: Compliant  
(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.

Comment: SL SOP 5 required dedicated sterilizers for knives used on edible tissue and for SRM removal. Split saws were dipped into 180°F sterilizers after each carcass split and were opened and rinsed if build-up occurred. Observed practices were consistent with written procedures.

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## 7 Training

### 7 Training

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**7.1** Employees responsible for all SRM related activities are adequately trained. Compliant

Confirm:  
(i) Employee training and competency,  
(ii) Adequacy of training program, and  
(iii) Training records.



Comment: Employees with SRM related responsibilities were trained prior to commencing duties and annually thereafter. Training included company policies and programs, and references to industry and regulatory guidance. Records of the most recent training conducted YTD 2024 evidenced compliance.

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## 8 SRM Removal and Disposal

<b>8</b>	SRM Removal and Disposal	
<b>8.1</b>	SRM is removed as potential source of contamination and disposed of according to 9 CFR 310.22(e).  Confirm: (i) All SRM is properly labeled, segregated, and disposed of, and (ii) Records are available to verify ongoing compliance.	Compliant
	Comment: SRMs were collected in red colored plastic bins, then transferred to a collection bin for removal to the landfill (brain and spinal cord) or to inedible rendering. SRMs were observed properly labeled. Landfill weight tickets were available indicating compliance. A Certification of CMPAF Segregation was on file from the renderer stating that carcasses identified as over 30 months of age were segregated prior to rendering and not used in animal feed.	

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## 9 Mis-splits

<b>9</b>	Mis-splits	
<b>9.1</b>	Missplits are treated as potential sources of SRM introduction into food chain.  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.	Compliant
	Comment: SL SOP 5 read that mis-splits were railed out and corrected on the kill floor with dedicated equipment. Observed practices were consistent with written procedures.	

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## 10 Verification of SRM Removal

<b>10</b>	Verification of SRM Removal	
<b>10.1</b>	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.  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)	Compliant
	Comment: Tonsils were removed by knife trimming and sent to inedible rendering.	
<b>10.2</b>	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)	Compliant

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Comment: Dorsal root ganglia was removed by chine saw and sent to inedible rendering. Spinal cord and brain were removed by vacuum and disposed to the landfill. Eyes and trigeminal ganglia remained in the skull and were disposed to inedible rendering.

**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: Spinal cord was not observed during a 10 minute inspection of all area of the vertebral column on the bone belt.

**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: Spinal cord was not observed during a 100 carcass side inspection in the chilling cooler.

## 11 Distal Ileum Removal

**11**            Distal Ileum Removal

**11.1**            Verify the measurement by observing the facility perform their verification check.            Compliant

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: Small intestines were not harvested. Distal ileum remained attached to the carcass and was sent to inedible rendering.

## 12 Whizzard Knives

**12**            Whizzard Knives

**12.1**            Whizzard knives used to trim all vertebral regions must have a blade that is  $\geq 2$  inches in diameter. Disarticulation of the individual vertebra is not permitted.            Compliant

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

Comment: Circular knives used to trim the vertebral regions were 2" in diameter.

## 13 Mechanically Separated Meat

**13**            Mechanically Separated Meat

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

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. Compliant

Comment: MSM was not produced.

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## 14 Shipping

**14** Shipping

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**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: The facility shipped bone in forequarters containing vertebral column. The customer provided a Cow Chuck Supplier Certificate of Analysis and returned it to the site indicating that any SRMs were removed and properly disposed. Completed supplier certificates were available indicating compliance.

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## 15 Self Audits

**15** Self Audits

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**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: The site conducted 10 carcass checks in the cooler and circular knife checks in fabrication once per period. Slaughter inspections included brain plugging, head drop procedure, tonsil removal, spinal cord/dura removal, and brain removal and disposal. Inspections were recorded in data collection software.

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## 16 Feed Ban

**16** Feed Ban

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**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: The site required a Beef Packers Wholesomeness Certificate which indicated that cattle were not fed ruminant materials in compliance with 21 CFR 589.2000. Three certificates were provided for suppliers on the current day line up.

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## 17 Conflict of Interest

**17** Conflict of Interest

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**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, Rudy Hernandez, do not have a conflict of interest with this auditee.

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