



Audit Report

FSNS Beef Trim CCP Addendum

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

Audit Date: September 09, 2025
Auditor: Noel D'Cruz



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

1	HACCP	
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 recent HACCP annual reassessment was 1/2/25 and recent reassessment for changes was 8/22/25. Each HACCP program had its own Reassessment Log that tracked the reassessment date, reason for reassessment, changes made, justification, and reassessed by.		
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; 2025 training records for CCP monitors witnessed during this assessment were verified. All CCPs were witnessed during the assessment. The monitors were knowledgeable of critical limits, monitoring requirements and corrective actions.		
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; 2025 CCP corrective actions were reviewed and evidenced compliance.		

2 Interventions/Process Aids - Steam Vacuum

2	Interventions/Process Aids - Steam Vacuum	
2.1	The establishment uses the steam vacuum intervention method.	No
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	The establishment has the following validation documentation for this intervention:	
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	The following was used to design the validation study(ies):	
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	The establishment has documented procedures that include the following:	
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
Comment: Steam vacuums were not utilized.		
2.7.7	Observation of the intervention in operation	Not Applicable
Comment: Steam vacuums were not utilized.		
2.7.8	None of the above.	Not Applicable
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
Comment: Steam vacuums were not utilized.		
2.9	The establishment's intervention operating parameters fall within the validation supporting documentation parameters	Not Applicable
Comment: Steam vacuums were not utilized.		

3 Interventions/Process Aids - Thermal Intervention

3	Interventions/Process Aids - Thermal Intervention	
3.1	The establishment uses the Thermal (hot water or steam pasteurization) intervention method.	Yes
Comment: The site used hot water re-circulated cabinets on carcasses pre-evisceration/post hide removal and the final carcass wash prior to chilling.		
3.2	The establishment identified this intervention as a CCP.	Yes
Comment: The re-circulated final hot water pasteurization cabinet was CCP 2 in the Slaughter HACCP plan.		
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 would automatically stop if the hot water temperature dropped. The line could run without hot water pasteurization with a chemical intervention (LA, PAA, or ASC).

3.4 The establishment has the following validation documentation for this intervention:

3.4.1 None Not Applicable

Comment: NA

3.4.2 Validated Third Party Challenge Study or Validation Study No

Comment: None

3.4.3 In-house Challenge Study or Validation Study Yes

Comment: In-plant Validation of Antimicrobial Interventions Used for Reduction of *Escherichia coli* O157:H7 on Beef Carcasses and Beef Trim completed on 3/29/21 by FSNS (Food Safety Net Services).

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

Comment: None

3.4.5 Resource white paper (Published Journal Article) No

Comment: None

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 Validation Study Design

3.5.1 A specific set of samples were chosen to support the validation hypothesis (objective). Yes

Comment: Set of 40 carcasses were evaluated pre and post treatment.

3.5.2 Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion. Yes

Comment: Set of 40 carcasses were evaluated pre and post with a generic *E. coli* surrogate cocktail. A mean log reduction of 4.5 was achieved.

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. Yes

Comment: The study was prepared by FSNS.

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:	On-going verifications included: 1) sampling one out of every 300 head harvested for generic <i>E. coli</i> and Enterobacteriaceae post-chill using 300 cm ² ; 2) quarterly process validations (hide on, hide off, after pre-wash, before final hot wash, after final hot wash, after PAA, after lactic, after spray chill hypobromous treatment, after pre-fab ASC) which consisted of sampling carcasses for APC, coliforms and generic <i>E. coli</i> , 10 carcasses sampled at each location for 8,000 cm ² ; 3) routine trim and offal intended for raw ground use ECH7 sampling (defined lots); 4) monthly trim Top 7 STEC verification sampling; and 5) daily CCP/pre requisite program monitoring of operating parameters.	
3.7	Documented Procedures	
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 and daily PMs.	
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, six surface probes were attached (3 per side on the outside round, flank, and shoulder) to a carcass passing through both the hot water cabinets (post hide removal and final carcass wash) to verify carcass surface temperature were a minimum 160F. Results were recorded on the Carcass Surface Temperatures; electronic records were verified.	
3.7.7	The establishment monitors dwell time.	No
Comment:	Dwell time was not monitored. The carcass surface temperature verification ensured adequate dwell time.	
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 and per period temperature probe 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 206°F, pressure was 11 psi, and arbors functioned properly for coverage.

4 Interventions / Process Aids -- Chemical Applications

4 Interventions / Process Aids -- Chemical Applications

4.1 The establishment uses Chemical Application(s) as an intervention method. Yes

Comment: Chemical interventions used were lactic acid (LA), peroxyacetic acid (PAA), acidified sodium chlorite (ASC), and hypobromous acid (HBA).

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: Lactic acid, peroxyacetic acid, and/or acidified sodium chlorite were applied to carcasses as CCP prior to chilling. During the assessment LA and PAA were applied in addition to hot water recirculation.

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.

Lactic acid was manually sprayed on carcasses immediately after hide opening at round/bung pattern mark and mid-line and prior to re-entry from the out-rail. Final carcass intervention treatment with lactic acid (LA), peroxyacetic acid (PAA), and/or acidified sodium chlorite (ASC). Hypobromous acid (HBA) in the second part of spray chill cycle. ASC pre-fabrication carcass spray. ASC on sub-primals and trimmings prior to packaging. Validation was in-house studies, scientific peer reviewed publications, and FSIS Directive 7120.1.

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. The site had three options for final carcass chemical intervention - LA, PAA, or ASC.

4.4 The establishment has the following validation documentation for this intervention:

4.4.1 None Not Applicable

Comment: N/A

4.4.2 Validated Third Party Challenge Study or Validation Study No

Comment: None

4.4.3 In-house Challenge Study or Validation Study Yes

Comment: In-plant Validation of Antimicrobial Interventions Used for Reduction of *Escherichia coli* O157:H7 on Beef Carcasses and Beef Trim completed on 3/29/21 by FSNS (Food Safety Net Services). This supported the lactic acid final carcass intervention.

4.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	No
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Comment: None

4.4.5	Resource white paper (Published Journal Article)	Yes
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Comment: PAA Support: 1) Antimicrobial Efficacy of Acidified Peroxyacetic Acid Treatments Against Surrogates for Enteric Pathogens on Prerigor Beef by Geornaras, 2020 demonstrated 0.5 log cfu/cm² reduction for EC7 and Salmonella on beef carcasses at 350-400 ppm PAA. 2) Yang 2024 Journal of Food Science Effect of PAA Sprays on beef carcasses inoculated with *E. coli* O157:H7 and Salmonella, PAA minimum 200 ppm, 7 log reduction.

ASC Support: 1) Effects of Cetylpyridinium Chloride, Acidified Sodium Chlorite, and Potassium Sorbate on Populations of *E. coli* O157:H7, *Listeria monocytogenes*, and *Staphylococcus aureus* on Fresh Beef, J. Food Prot. 67:310-315. ASC 2.5-2.9 pH, 0.12%, EC7 Day 0 2.5 log O157. 2) Decreased Dosage of ASC Reduces Microbial Contamination and Maintains Organoleptic Qualities of Ground Beef Products, JFP 67: 2248-2254. ASC 300 ppm – 600 ppm, beef trimmings, APC/EB, 1-1.5 log APC/EB at 300 ppm, APC/EB, 0.7 – 2.3 log APC/EB at 600 ppm.

4.4.6	Resource white paper with third party review (peer reviewed paper - not published)	No
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Comment: None

4.4.7	Other -- List in comments	No
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Comment: None

4.5 Validation Study Design

1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes
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Comment: 40 carcasses were sampled pre and post lactic acid treatment.

2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes
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Comment: Set of 40 carcasses were evaluated pre and post with generic *E. coli* surrogate cocktail. A mean log reduction of 1.6 was achieved.

3	Scientific support documentation.	Yes
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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.	Yes
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Comment: The study was prepared by FSNS.

5	Other -- List in comments	Yes
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Comment: PAA and ASC was supported by peer reviewed scientific publications listed in 4.4.5 and quarterly biomapping sampling. Quarterly process validations (hide on, hide off, after pre-wash, before final hot wash, after final hot wash, after PAA, after lactic, after spray chill hypobromous treatment, after pre-fab ASC) which consisted of sampling carcasses for APC, coliforms and generic *E. coli*, 10 carcasses sampled at each location for 8,000 cm².

4.5.1	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
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Comment: On-going verifications included: 1) sampling one out of every 300 head harvested for generic *E. coli* and Enterobacteriaceae post chill using 300 cm²; 2) quarterly process validations (hide on, hide off, after pre-wash, before final hot wash, after final hot wash, after PAA, after lactic, after spray chill hypobromous treatment, after pre-fab ASC) which consisted of sampling carcasses for APC, coliforms and generic *E. coli*, 10 carcasses sampled at each location for 8000 cm²; 3) routine trim and offal intended for raw ground use ECH7 sampling (defined lots); 4) monthly trim Top 7 STEC verification sampling; and 5) daily CCP/pre requisite program monitoring of operating parameters.

4.6 Documented Procedures

1	The establishment has documented procedures that include the following: Operation of this intervention method, including application of the treatment	Yes
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Comment: Preventive maintenance instructions included operation instructions.

2	Preparation of the treatment solution(s)	Yes
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Comment: Preventive maintenance instructions included preparation of treatments.

3	Start up of the intervention equipment	Yes
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Comment: Preventive maintenance instructions included startup requirements.

4	Shut down of the intervention equipment	Yes
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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
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Comment: Titration was utilized to verify concentration. Limits were established in pre-requisite programs and CCPs.

4.6.2	The establishment monitors the temperature of the treatment solutions.	Yes
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Comment: Temperature was monitored and logged on CCP and SOP records.

4.6.3	The establishment monitors the flow / volume	No
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Comment: Flow or volume were not monitored.

4.6.4	The establishment monitors the nozzle pressure.	Yes
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Comment: Nozzle pressure was monitored and logged on CCP and SOP records.

4.6.5	The establishment ensures all areas and/or surfaces of the carcass are adequately covered by the chemical application.	Yes
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Comment: Coverage was verified during monitoring and recorded on CCP and SOP logs.

4.6.6	The intervention method is implemented as written in the documented procedure.	Yes
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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
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Comment: Concentration, temperatures, pressure, and application were within supporting validation parameters during the assessment verification.

4.8	Alternate / Novel Interventions / Process Aids
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4.8.1	Is / Are there alternative intervention methods(s) being utilized other than those listed in the previous pages	No
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Comment: Novel interventions were not utilized.

5 Dressing Procedures / Critical Job Tasks

5	Dressing Procedures / Critical Job Tasks
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5.1	Is there an intervention or process aid utilized upon entering or exiting the out rail.	Yes
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Comment: Lactic acid 2-10% was 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
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Comment: SOP SL 16 Slaughter Job Positions dated 1/2/25 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
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Comment: Hot (180°F) water was utilized to sanitize equipment during operations.

5.4	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.
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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
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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
Comment: Not utilized.		
5.4.3	Knife blade stays in the dip for 4-6 seconds.	Yes
Comment: Knife dip for 4-6 seconds was used via knife rotation method.		
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: Sanitary Dressing monitoring conducted by QA consisted of monitoring each slaughter position hourly for 5 head at each position. Monitoring was done on the floor and not via cameras.		
5.7	Type(s) of monitoring at the establishment:	
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
Comment: Supervisors provided oversight of the process; not documented monitoring.		
5.7.3	Video	No
Comment: Video was not used for sanitary dress monitoring tasks.		
5.7.4	Other -- List in Comments	Not Applicable
Comment: None		
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, Noel DCruz, do not have a conflict of interest with this auditee.		