Audit Report

Beef Trim N60 Addendum

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

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

Audit Summary

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Beef Trim -- N60 Addendum

1 Interventions for Pathogen Reduction

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1.1	*E. coli* O157:H7 is a hazard likely to occur in the facility's HACCP plan(s)	Yes
Comment:	*E. coli* O157:H7 was identified as a potential hazard reasonable likely to occur in the HACCP plans.	
1.2	The facility uses one or more recognized microbiological intervention technologies in its process. Acceptable technologies include: steam pasteurization, hot water pasteurization, organic acid rinses, steam vacuums, or antimicrobial treatments. (List the technologies utilized)	Yes
Comment:	The site used hot water pasteurization, lactic acid (LA), peroxyacetic acid (PAA), hypobromous acid (HBA), and acidified sodium chlorite (ASC).	

List all microbiological interventions and pathogen reduction processing aids. Include both slaughter and fabrication related interventions that are applied. Additionally, the facility must have at least one of the interventions designated as a Critical Control Point (CCP) in its HACCP plan to address *E. coli* O157:H7 (Identify which interventions are CCPs by putting (CCP) after intervention). Document what the facility is monitoring (Ex. concentration, temperature, dwell time, etc.) for each intervention and identify which interventions are CCPs.

Slaughter Interventions	What parameters are monitored?
Carcass Peroxyacetic acid (either/or CCP) - current CCP 3	Concentration, temperature, pressure, and coverage
Carcass Acidified sodium chlorite (either/or CCP 3)	Concentration, temperature, pressure, pH, and coverage
Carcass Lactic acid (either/or) - current CCP 3	Concentration, temperature, pressure, and coverage
Hypobromous acid (spray chill)	Concentration, temperature, pressure, and coverage
Recirculated Hot water pasteurization - CCP 2	Temperature, pressure, coverage
Recirculated Hot water pasteurization post hide removal.	Temperature, pressure, coverage

Lactic acid - manual pattern mark treatment and prior to re-entry from outrail.	Concentration, coverage
Offal PAA or LA or ASC - CCP 4	Concentration, temperature, pressure, pH (for ASC), and coverage

Fabrication Interventions

Fabrication Interventions	What parameters are monitored?
Acidified sodium chlorite (ASC) on carcass sides prior to fabrication.	Concentration, pressure, temperature, pH, and coverage
Acidified sodium chlorite (ASC) on trimmings prior to packaging.	Concentration, pressure, temperature, pH, and coverage
Acidified sodium chlorite (ASC) on subprimals prior to packaging.	Concentration, pressure, temperature, pH, and coverage

Any microbiological intervention technology designated as a CCP has been validated against *E. coli* O157:H7. Validation studies (may be a 3rd party challenge study, journal paper, in-house study, etc.) are on file. List validation materials and date of validation. [Note - if not thermal (steam or hot water), intervention must be validated and demonstrated as equal or better to thermal systems for microbial-pathogen reduction. Validation materials must be provided to support equivalency or reduction capabilities.]

Study Type	Study Name
In-house Validation	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).
Challenge Study	Antimicrobial Efficacy of Acidified Peroxyacetic Acid Treatments Against Surrogates for Enteric Pathogens on Prerigor Beef by Geornaras, 2020
Journal Article	Yang 2024 Journal of Food Science Effect of PAA Sprays on beef carcasses inoculated with *E. coli* O157:H7 and Salmonella

Journal Article	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.
Journal Article	Decreased Dosage of ASC Reduces Microbial Contamination and Maintains Organoleptic Qualities of Ground Beef Products, JFP 67: 2248-2254.

List all on-going verification programs for microbiological interventions and pathogen reduction processing aids.

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 prewash, before final hotwash, 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; 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.

1.4 Does the facility have a direct product treatment intervention on trim prior to N60 sampling? Note if facility treats trim or trim belts prior to sorting, boxing, or comboing of product. — Yes

Comment: ASC was applied to trimmings prior to combo fill and sampling.

2 Sampling Programs for Products Destined for Raw, Ground

2 Note: A minimum of N=60 testing per lot for *E. coli* O157:H7 is performed on beef trim and other raw beef components [i.e., head meat, hearts, etc.] produced in the plant that are 'intended for raw ground use'. Sampling programs must be written and supported with validation data and documentation. Related documents shall be available for review upon request.

2.1 Facility produces combo trim? — Yes

Comment: Combo trim was produced.

2.2 Written sampling program in place for combo trim — Yes

Comment: MSD Micro Tally Cloth Sampling SOP explained combos were sampled for 45 seconds on one half of combo, and 45 seconds on the other half of combo.

2.3 Facility produces box trim? — Yes

Comment: Tested boxed trim was produced.

2.4	Written sampling program in place for box trim	Yes
Comment:	N60/IEH N60 Plus Sampling SOP outlined box trim sampling of no more than 5 pallets, N60, Samples were 3” long x 1” wide x 1/8” thick targeting exterior tissue, sample weight 375 g (not to exceed 400 g).	
2.5	Facility produces FTB, BLBT, LTB, AMR or similar material?	Not Applicable
Comment:	Such products were not produced.	
2.6	Written sampling program in place for FTB, BLBT, LTB, AMRor similar material	Not Applicable
Comment:	Such products were not produced.	
2.7	Facility produces other raw beef components (head meat, cheek meat, hearts, tongue root, etc.)?	Yes
Comment:	The site produced and tested head meat, hearts, salivary glands, and cheek meat.	
2.8	Written sampling program in place for other raw beef components	Yes
Comment:	Offal Sampling SOP outlined sampling for head meat, cheek meat, hearts, and salivary glands/ tongue trimmings. N60 excision method was used. Samples were 3” long x 1” wide x 1/8” thick targeting exterior tissue, sample weight 375 g (not to exceed 400 g). Sample lots were per period per product type. The SOP did not define how many boxes had to be sampled from.	
2.9	Sampling program is demonstrated and validated as robust and rigorous and is equivalent or better to the N=60 ‘best practice’ program for 95% or better statistical confidence. If not N=60, describe sampling process and list N value in Comments.	Yes
Comment:	N60 excision sampling was used for variety meat and boxed trim products. Combo trim samples were collected using the manual cloth method. Cloth Sampling Validation April - May 2018 was provided comparing the cloth method to N60 excision and N60 plus shaver method, 95% or better statistical confidence.	
2.10	How are the samples collected? [For example, traditional excision, modified excision, mechanical, or cloth method. NOTE – Traditional excision is defined as the USDA sampling method.]	Remark
Comment:	Box trim and variety meat samples were collected by traditional N60 excision sampling. Combo trimming samples were collected by MSD (manual sampling device) using the cloth method.	

Sampling Method

Question	Method	Comment
How are the samples collected? [For example, traditional excision, modified excision or mechanical. NOTE – Traditional excision is defined as the USDA sampling method.]	Other	Box trim and variety meat samples were collected by traditional N60 excision sampling. Combo trimming samples were collected by MSD (manual sampling device) using the cloth method.

2.12	If procedure is modified from traditional excision, is there validation documentation?	Yes
Comment:	Cloth Sampling Validation April - May 2018 was provided comparing the N60, N60+, and Cloth for APC and EB recovery.	
2.13	Facility verifies sample counts? List the frequency in Comments (ex. X times by plant per week, X times by lab per week). How is sample count verification documented?	Yes
Comment:	Sampling procedures were verified daily by QA management on trim and offal samples on the floor or via cameras and this verification was recorded on the Sample Tracking Sheet.	
2.14	Facility verifies sample weights? Describe the process and list the frequency in Comments. List sample weight minimum, maximum, and target. List how weight verification is documented.	Yes
Comment:	Sample weights for excision samples for variety meats and trim were recorded; target being 375-400 g. Cloth weights were taken and recorded; there was no target weight gain established. This was conducted for each sample by the samplers.	
2.15	Does sampling program target – where possible - surface tissue over internal tissue?	Yes
Comment:	External tissue was targeted.	
2.16	Does sampling program require each excision sub-sample to be collected from distinctly different trim pieces?	Yes
Comment:	Excision samples were required to be collected from distinctly different pieces. Cloth samples were collected from the entire top surface of the combo.	
2.17	Sampling program should account for exceptions for extremely large pieces of product where it may not be possible to sample individual pieces (2 piece-chucks, goosenecks). Describe exception.	Yes
Comment:	The site cut larger pieces into manageable sizes to accommodate sampling. Tested 2 pc chucks were not produced.	
2.18	Is there a program in place to address the handling of lotting for slow fill versus fast fill combos?	Yes
Comment:	Gooseneck rounds were slower fill and trim was faster fill. There were no combo fill stations that required longer than one production period to fill. The sampling method was the same regardless of the fill time. Start and end fill times were not recorded for combo fill, just the manifest time on product label.	
2.19	OBSERVATION OF TRIM SAMPLING – Auditor should observe sample collection and report accuracy against specified method and SOP.	Yes
Comment:	Samples were collected according to written protocols. The employee collecting the sample sanitized their plastic gloves and sleeves. Sample technique and collection time were consistent with the sampling SOP. An independent QA timer was used to assist in the sampler ensuring the 2x 45 seconds requirement was met for cloth sampling time.	

2.20	Employees performing sampling programs are trained to complete sampling tasks and training is documented. Verification of employee sampling techniques are visually reviewed (direct observation) at an established frequency. Reviews are documented.	Yes
Comment:	Employees conducting sampling were trained initially and annually. Records of the most recent training in 2025 were available. Sampling procedures were verified daily by QA management on trim and offal samples on the floor or via cameras and this verification was recorded on the Sample Tracking Sheet.	

2.21	Lotting methods and lot sizes are defined and designed to cover all 'intended for raw ground' meat components produced in plant. Lotting programs must be supported with documentation.	Yes
Comment:	Lotting methods were defined in sampling programs.	

Lot Size

Type	Lot Size	Comment
Trim Combo	Combos	Single combo lots.
Box Trimmings	Pallets	Up to five pallets
Variety meats	Pallets	Up to five pallets; per period per product type

3 Verification Testing / Check Sample Program

3

3.1	As an ongoing verification/check of the sampling and testing procedures in the plant, the facility conducts quarterly verification/check samples of N=60 tested trimmings by subjecting a negative tested 'lot' to grinding and subsequent finished product testing.	Yes
Comment:	Verification sampling was conducted monthly for trim (not offal).	

3.2	If the facility wishes to take the verification sample prior to the receipt of the initial ECH7 lab results, this is permissible to save time. However, the facility must confirm that the initial N=60 sample is negative, and if the results are not negative, a new verification sample must be taken.	Yes
Comment:	The combo had to yield a negative ECH7 result via the routine method prior to the verification sample being collected. Therefore, the verification sample was collected the day after the trim combo production date.	

3.3	The verification sample is required to be taken from finished (ground) product. If there are variances from this in the facility's protocol, customers must be notified. Verification sample should be taken from finished (ground) product	Yes
Comment:	Verification sample was ground prior to sample collection.	

3.4	Verification/check sampling and testing are increased to a monthly frequency for second and third quarters (April – September). Auditor is to list the dates of the last three quarters verification/check samples in the comments section.	Yes
Comment:	Verification sampling was conducted monthly. Testing for the past three quarters in 2025 was conducted on 1/8, 2/5, 3/5, 4/24, 5/7, 6/23, 7/8, 8/6, 9/10. All samples were negative for STECs.	
3.5	OBSERVATION OF VERIFICATION / CHECK SAMPLING - N60 verification/check samples shall be observed by an independent third party auditor minimally one time per year, Lab testing shall be conducted at a third party lab minimally one time per year.	Yes
Comment:	Verification sampling was observed by a third party annually. Laboratory testing was contracted for routine samples and same laboratory used for verification samples.	
3.6	At least one of the third party observations shall occur between April-September of the calendar year. Results are to be reported directly to customer (as requested). Additionally, if the facility utilizes a third party lab, the observation sample does not need to go to a different lab.	Yes
Comment:	Third-party observation of the trim verification sample occurred during April - September. This verification sample was observed on 9/11/25 during this assessment. Laboratory testing was contracted for routine samples and same laboratory used for verification samples.	
3.7	Aseptic technique being followed when performing verification testing.	Yes
Comment:	Verification samples were collected aseptically. The offline grinder and collection tubs were clean and sanitized. The employee collecting the sample sanitized plastic gloves and sleeves.	
3.8	Where possible, surface tissue being targeted over internal tissue.	Not Applicable
Comment:	The sample was collected by grab sample and ground in an offline grinder.	
3.9	Excision sub-samples are being collected from distinctly different pieces.	Not Applicable
Comment:	The sample was collected by grab sample and ground in an offline grinder.	
3.10	List piece count of the final sample if applicable.	Not Applicable
Comment:	Piece count not applicable to grab sampling.	
3.11	List weight of the final sample.	Comment Only
Comment:	The ground sample was filled in the sample bag on a scale to meet the 375 g weight.	

4 Testing Laboratory

4		
	Laboratory Information	

Lab Name	Lab Location
FSNS	Boise, ID

List Accreditation and/or Third Party Audit & date.

The laboratory was ISO/IEC 17025:2017 accredited through A2LA with a certificate valid until 9/30/25. Proficiency testing was part of the accreditation.

4.2	If the testing for *E. coli* O157:H7 is on-site, the laboratory is physically isolated from production areas.	Not Applicable
Comment:	Testing was conducted by an off-site external laboratory.	
4.3	Controls to prevent pathogen contamination are in place.	Not Applicable
Comment:	Testing was conducted by an off-site external laboratory.	
4.5	There is a program for running positive controls/cultures with documented records for all analyses.	Yes
Comment:	Positive controls were run daily and results were maintained.	
4.6	Laboratory participates in a proficiency testing program to assure accuracy of its results. Records are available for review. List proficiency program used.	Yes
Comment:	The laboratory was ISO/IEC 17025:2017 accredited through A2LA with a certificate valid until 9/30/25. Proficiency testing was part of the accreditation.	

5 Lab Methods

5

5.1	All sampled slices from a 'lot' shall be enriched and tested. Sampled pieces shall be enriched as intact slices [massaged], and not ground in the enrichment sample.	Yes
Comment:	Samples were enriched intact.	
5.2	If "wet" compositing is being used, list what an enrichment represents (EXAMPLES: N=15 per combo for 5 combos; N=60 per combo; 9 minute ground beef sample).	Not Applicable
Comment:	Wet compositing not utilized.	
5.3	If "wet" compositing is being used, list the number of enrichments that make up the "wet" composite (EXAMPLE: If N=60 per combo completed on 5 different combos, each N=60 is enriched, each of the enrichments are used to make up one "wet" composite, then the answer would be 5).	Not Applicable
Comment:	Wet compositing not utilized.	
5.4	Rapid screen method is either: (a) PCR DNA amplification, or (b) ELISA-based tests, which is capable of detecting known pathogenic strains of *E. coli* O157:H7 [including Cluster A strains].	Yes

Comment: PCR DNA screening method was utilized.

For the following, please note if methodologies differ based on product types (ex. trim testing has different enrich time versus ground product).

Method	Document all methods being used by facility.	Document incubation time, temperature, and dilution factor
Method 1	*E. coli* 0157:H7 FSNS # 12.17 (PCR-BAX RT EXACT). AOAC-RI-102003	8-10 hours @ 42C (+/-2C) and a 1:5 dilution factor for meat or 200ML for cloth
Method 2	AOAC-RI 091301, USDA MLG Chapter 5 (non-*E. coli* O157:H7 STEC RT), method SOP 12.8	8-10 hours @ 42C (+/-2C) and a 1:5 dilution factor
Method 3		

5.6 If method includes “wet” compositing, is the method validated? Not Applicable

Comment: Wet compositing not utilized.

5.7 Presumptive positives are deemed positive if not culturally confirmed. Yes

Comment: Product disposition was based on initial test results.

5.8 Product disposition is determined on presumptive positives. [NOTE: If “wet” compositing is being used, describe how product disposition is determined on a presumptive positive.]. Yes

Comment: Product disposition was based on initial test results.

5.9 Confirmation capability of the lab is validated. Not Applicable

Comment: Cultural confirmation not conducted.

5.10 Facility has an Event Day (or Multiple Positive Day) program outlining procedures and corrective actions in the event that multiple presumptive positives are detected in one production day. Yes

Comment: High Event Period SOP explained procedures for managing event days.

6 Certificate of Analysis

6

6.1 Product produced as ‘intended for raw ground use’ is accompanied with a Certificate of Analysis [COA] showing a negative result for each tested ‘lot’, at or before time of receiving. COA identifies the ‘lots’ covered by the test results, and is applicable to all product received in a shipment or order. Yes

Comment: A COA was required for each shipment of trimming destined for raw ground use.

6.2	All laboratory results are subject to a minimum of a dual review and approval process.	Yes
Comment:	Laboratory results were subject to a dual review and approval process by the lab.	
6.3	Each Certificate of Analysis has its own unique number or identifier.	Yes
Comment:	Unique report number was on each COA.	
6.4	COA's that are revised indicate a revision date, revision reason and are traceable to the original COA.	Yes
Comment:	If a COA was revised it was noted in the 'remarks' section of the report, with a reference to the original COA report number.	
6.5	The document clearly identifies that it is a Certificate of Analysis. List identifier.	Yes
Comment:	Analytical Results was printed across the top of the report.	
6.6	The type of test and testing method used are listed on the Certificate of Analysis.	Yes
Comment:	Test type and method were listed on the COA.	
7	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.	