



Audit Report

Specified Risk Material Audit

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
Address:	17365 South Cole Road Kuna, Idaho 83634		

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Audit ID:	AO-011793
Audit Date:	September 09, 2025
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Noel D'Cruz
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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

1	Downers	
1.1	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. 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. Comment: Downers were identified in the Non-Ambulatory and Ante-Mortem Condemned Cattle SOP as an animal that could not rise or walk under its own power. Downers were euthanized, bled, placed in the dead pen, denatured, and sent to the landfill.	Compliant
1.2	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. Comment: Downers were not present during this assessment.	Compliant
1.3	Determine if records are available to confirm compliance with this requirement through the documentation of downers and their subsequent disposition. Comment: Condemned Log tracked downers, USDA condemnations, and DOAs. Weekly SRM Disposal and Landfill receipts were provided.	Compliant

2 Stunning

2	Stunning	
2.1	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). Verify that air injection stunning is not being performed. Comment: Air injection stunning was not utilized. The site used captive bolt stunning; pneumatic and handheld captive bolt stunners were used.	Compliant

3 Age Identification

3	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 the Dentition SOP and SRM SOP. Observed practices were consistent with written requirements. The under 30 month/young lot were harvested and fabricated as their own lots at the start of the day.

4 SRM Removal/Segregation/Disposition

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- 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 SOPs explained procedures for SRM removal, segregation, and disposition for each SRM related position. The vertebral column and DRG was removed by saws and knife trimming and sent to inedible rendering. Spinal cord and brain were removed by vacuum tools and disposed to the landfill. Eyes, skull, and trigeminal ganglia remained in the head remnants and were disposed to inedible rendering. Tonsils were removed by knife trimming and sent to inedible rendering. Small intestine product was not harvested, and sent to inedible rendering. Observed practices were consistent with written procedures.

5 BSE Tested Animals

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- 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 the landfill. The animal was not held pending results.

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 the landfill. The animal was not held pending results.

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: The site ran young/under 30 month cattle/carcasses as separate lots during harvest and processing first in the day. SRM SOPs 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 and SRM tools were not used on edible tissue.

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: The site ran young/under 30 month cattle/carcasses as separate lots during harvest and processing first in the day. SRM SOPs 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.

7 Training

7	Training	
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 2025 evidenced compliance. Adequacy of training and competency was evaluated during daily QA SRM audits, USDA SRM task verifications, and internal audit.	

8 SRM Removal and Disposal

8	SRM Removal and Disposal	
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: 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. Weekly SRM Disposal and Landfill receipts were provided.	

9 Mis-splits

9	Mis-splits	
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: SRM Job Positions addressed mis-splits that were railed out and corrected on the kill floor with dedicated equipment. Observed practices were consistent with written procedures.	

10 Verification of SRM Removal

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- 10.1** Verification of SRM removal section. Compliant
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)

Comment: Tonsils were removed by knife trimming (white handled) and sent to inedible rendering.

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- 10.2** Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter) Compliant

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.

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- 10.3** **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 of > 30 month carcasses in cooler prior to fabrication on 9/11/25.

11 Distal Ileum Removal

- 11** Distal Ileum Removal

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- 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 viscera set on the viscera table and was sent to inedible rendering.

12 Whizzard Knives

- 12** Whizzard Knives

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- 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. 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: Such product 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: Such product was not produced.

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 Letter of Guarantee for every load shipped indicating that any SRMs were removed and properly disposed. A LOG for a load shipped on 9/8/25 was verified.

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: Daily QA monitoring was as follows: 1) SRM steps in harvest every period; 2) Carcasses at the end of harvest entering the hotboxes were evaluated for spinal cord, 50 sides every period; 3) in the staging cooler prior to fabrication 100 sides daily were checked for spinal cord; 4) SRM check every period on fab floor. Monitoring records from 2025 were verified.

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
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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: Every producer that supplied cattle to the site completed the Producer's Wholesomeness Certificate (Continuing Certificate) every three years that included that none of the livestock were fed any feed or supplement containing protein derived from mammalian tissues (ruminant meat and bone meal) as defined in 21 CFR 589.2000. Verified completed certificates for three producers.

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
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Comment: I, Noel DCruz, do not have a conflict of interest with this auditee.
