



Audit Report

FSNS Beef Trim CCP Addendum

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

Audit Date: September 04, 2026
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: The HACCP programs were reassessed for changes, unforeseen hazards, and at a minimum of annually. Each HACCP program had a Reassessment Log that included the reassessment date, reason for reassessment, changes made, change made/ justification, and reassessed by. The recent most entries in the reassessment logs (7/14/26) matched the current HACCP program dates.		
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 when newly assigned and minimum annually thereafter. Recent 2026 CCP training logs for monitors observed were verified.		
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 detailed in the HACCP programs met the requirements of 9 CFR 417.3 to include root cause, bring CCP back under control, preventive measure, and product disposition. CCP deviations were tracked in a matrix. Reviewed CCP deviations for carcass zero tolerance from 3/9/26; carcass zero tolerance from 1/2/26; and variety meats zero tolerance (ingesta in cheek meat) from 5/14/26.		

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 used.		
2.2	The establishment identified this intervention as a CCP.	Not Applicable
Comment: Steam vacuums were not used.		
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 used.		
2.4	The establishment has the following validation documentation for this intervention:	
2.4.1	None	Not Applicable

Comment: Steam vacuums were not used.		
2.4.2	Validated Third Party Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not used.		
2.4.3	In-house Challenge Study or Validation Study	Not Applicable
Comment: Steam vacuums were not used.		
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 used.		
2.4.5	Resource white paper (Published Journal Article)	Not Applicable
Comment: Steam vacuums were not used.		
2.4.6	Resource white paper with third party review (peer reviewed paper - not published)	Not Applicable
Comment: Steam vacuums were not used.		
2.4.7	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not used.		
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 used.		
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 used.		
2.5.3	Scientific support documentation.	Not Applicable
Comment: Steam vacuums were not used.		
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 used.		
2.5.5	Other -- List in comments	Not Applicable
Comment: Steam vacuums were not used.		
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 used.		
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 used.		
2.7.2	Temperature monitoring	Not Applicable
Comment: Steam vacuums were not used.		
2.7.3	Vacuum monitoring	Not Applicable
Comment: Steam vacuums were not used.		
2.7.4	Steam pressure monitoring	Not Applicable
Comment: Steam vacuums were not used.		
2.7.5	Removal of contamination (Must follow regulatory guidelines of 'less than one inch')	Not Applicable
Comment: Steam vacuums were not used.		
2.7.6	Maintenance of the intervention equipment	Not Applicable
Comment: Steam vacuums were not used.		
2.7.7	Observation of the intervention in operation	Not Applicable
Comment: Steam vacuums were not used.		
2.7.8	None of the above.	Not Applicable
Comment: Steam vacuums were not used.		
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 used.		
2.9	The establishment's intervention operating parameters fall within the validation supporting documentation parameters	Not Applicable
Comment: Steam vacuums were not used.		

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: Carcass hot water re-circulated cabinets were used pre-evisceration/post hide removal and post-evisceration/pre-chill.		
3.2	The establishment identified this intervention as a CCP.	Yes
Comment: The post-evisceration/pre-chill cabinet was CCP 2 Carcass Recirculated Hot Water Wash - The critical limit was a hot water temperature minimum of 198°F at the header, monitored once per production hour through visual verification of the temperature gauge and that the product passing through the cabinet was properly covered.		
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 below the limit. The line could run without hot water pasteurization with a back-up 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: N.A.

3.4.2 Validated Third Party Challenge Study or Validation Study Yes

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). The study was prepared by Dr. Alex Brandt, Chief Science Officer, FSNS.

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 treatment with a generic E. coli surrogate cocktail. A mean log reduction of 4.5 was achieved that supported the conclusion.

3.5.3 Scientific support documentation. Yes

Comment: Microbial reductions from the in-plant validation study provided support.

3.5.4 Validation study was prepared by a third party. List the name of the third party in comments. Yes

Comment: The validation 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: Ongoing verifications included: 1) Quarterly Verification Testing SOP (dated 1/1/26) outlined quarterly process validations (hide on, hide off, after prewash, before final hot wash, after final hot wash, after PAA, after lactic acid, after spray chill hypobromous treatment, after pre-fab ASC) which consisted of sampling 10 carcasses at each location for APC (8,000 cfu/sq cm), coliforms and generic E. coli. Results were trended for analysis. 2) Carcass Sampling SOP (dated 2/17/26) outlined daily chilled carcass sampling for one time per 300 head harvested, tested at the flank, brisket and rump (100 cm² each site) for generic E. coli and Enterobacteriaceae. Action limit > 0.8 cfu/cm² on the SPC chart; current chart verified. 3) MSD Micro Tally Cloth Sampling SOP (dated 1/1/26) outlined box trim E. coli O157:H7 sampling via the manual cloth method; 3 boxes swabbed 30 seconds per box for a total of 90 seconds. The lot consisted of 35 boxes or less per pallet of boxed trimmings. The SOP outlined combo E. coli O157:H7 sampling as single combo lots; 45 seconds one half of combo with one side of the cloth, and 45 seconds other half of combo with the other side of the cloth. 4) MT43 Sampling (dated 1/2/26) outlined monthly trim Top 7 STEC verification sampling. A negative E. coli O157:H7 test combo was randomly selected; 50 lbs. of trim grabbed and ground twice through an offline grinder; and minimum 375 gram grab sample taken.

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 QA monitoring.

3.7.4 Checking the position of the arbors (are they moving correctly, or if stationary, are they aimed correctly). Yes

Comment: Arbor function was verified during QA monitoring.

3.7.5 Start-up and shut-down procedures. Yes

Comment: Start-up and shut-down procedures were in 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: one time per period, six surface probes were attached (three per side on the outside round, flank, and shoulder) to a carcass passing through both the hot water recirculated cabinets (post hide removal/PECS and final carcass wash) to verify carcass surface temperatures were a minimum 160F. Results were recorded on the Carcass Surface Temperatures; recent records via the electronic record keeping platform were verified.

3.7.7 The establishment monitors dwell time. No

Comment: Dwell time was not monitored. The carcass surface temperature verification described in 3.7.6 above 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 hourly by QA visually and via the surface probes every period.

3.7.8 The establishment documents monitoring of start-up and shut-down. Yes

Comment: Monitoring of start-up and shut-down was via Maintenance PMs.

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

Comment: During the facility walk through, both the hot water re-circulated cabinets were verified to be operating properly within the critical operating parameters.

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), hypobromous acid (HBA), and acidified sodium chlorite (ASC).

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: CCP 3 Carcass lactic acid, ASC or PAA - Lactic acid critical limits were 2-10% concentration at the mixing tank, temperature range 75-150F and a visual verification for adequate coverage. ASC critical limits were concentration 500-1200 ppm, pH 2.3-2.9, temperature ranging from ambient to 105F, and full coverage. PAA critical limits were concentration 200-1800 ppm, ambient temperature, and full coverage. Monitoring was once per production hour. The site was running only lactic acid during the assessment.

CCP 4 Offal lactic acid, ASC or PAA - Lactic acid critical limits were 2-5% concentration at the cabinet, temperature range 75-150F and a visual verification for adequate coverage. ASC critical limits were concentration 500-1200 ppm, pH 2.3-2.9, temperature ranging from ambient to 105F, and full coverage. PAA critical limits were concentration 200-1800 ppm, ambient temperature, and full coverage. Monitoring was once per production hour. The site was using PAA during this assessment.

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.

LA (lactic acid) was applied via spray nozzles on the carcass during hide removal for pattern mark treatment. Final carcass intervention treatment was LA, PAA, and/or ASC (CCP). LA was manually applied on out-rail carcasses prior to railing back in. Carcasses were sprayed with HBA in the second part of the spray chill cycle. Offal products were sprayed via PAA cabinets (CCP). Pre-fab carcass ASC cabinet was also used. Trimmings and sub-primals received ASC treatment prior to packaging. The intervention limits were based on scientific/ technical support 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: If the chemical application was a CCP, the line could not run if not operational or within critical operating parameters.

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). The study was prepared by Dr. Alex Brandt, Chief Science Officer, FSNS.

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

Comment: None

4.4.5 Resource white paper (Published Journal Article) Yes

Comment: PAA Support: 1) Antimicrobial Efficacy of Acidified Peroxyacetic Acid Treatments Against Surrogates for Enteric Pathogens on Prerigor Beef by Britton, et. al. 2020. Meat & Muscle Biology, Colorado State University. 2) Antimicrobial Efficacy of PAA Spray for Beef Carcasses and Cuts at Beef Processing Plants by X. Yang and H. Wang. 2024 J. of Food Safety.

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 by K. Lim & A. Mustapha, J. Food Prot., 2004, Vol. 67, No. 2, pages 310-315. 2) Decreased Dosage of ASC Reduces Microbial Contamination and Maintains Organoleptic Qualities of Ground Beef Products by Bosilevac et al, Journal of Food Protection, 2004, Vol. 67, No. 10, pages: 2248-2254.

4.4.6 Resource white paper with third party review (peer reviewed paper - not published) No

Comment: None

4.4.7 Other -- List in comments No

Comment: None

4.5 Validation Study Design

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 lactic acid treatment.		
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 treatment with a generic E. coli surrogate cocktail. A mean log reduction of 1.6 was achieved that supported the conclusion.		
3	Scientific support documentation.	Yes
Comment: Microbial reductions from the in-plant validation study provided support.		
4	Validation study was prepared by a third party. List the name of the third party in comments.	Yes
Comment: The validation study was prepared by FSNS.		
5	Other -- List in comments	Yes
Comment: PAA and ASC was supported by peer reviewed scientific publications listed in 4.4.5 and quarterly verification testing. Quarterly Verification Testing SOP (dated 1/1/26) outlined quarterly process validations (hide on, hide off, after prewash, before final hot wash, after final hot wash, after PAA, after lactic acid, after spray chill hypobromous treatment, after pre-fab ASC) which consisted of sampling 10 carcasses at each location for 8000 cm2 for APC, coliforms and generic E. coli. Results were trended for analysis.		
4.5.1	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
Comment: Ongoing verifications included: 1) Quarterly Verification Testing SOP (dated 1/1/26) outlined quarterly process validations (hide on, hide off, after prewash, before final hotwash, after final hot wash, after PAA, after lactic acid, after spray chill hypobromous treatment, after pre-fab ASC) which consisted of sampling 10 carcasses at each location for 8000 cm2 for APC, coliforms and generic E. coli. Results were trended for analysis. 2) Carcass Sampling SOP (dated 2/17/26) outlined daily chilled carcass sampling for one time per 300 head harvested, tested at the flank, brisket and rump (100 cm2 each site) for generic E. coli and Enterobacteriaceae. Action limit > 0.8 cfu/cm2 on the SPC chart; current chart verified. 3) MSD Micro Tally Cloth Sampling SOP (dated 1/1/26) outlined box trim E. coli O157:H7 sampling via the manual cloth method; 3 boxes swabbed 30 seconds per box for a total of 90 seconds. The lot consisted of 35 boxes or less per pallet of boxed trimmings. The SOP outlined combo E. coli O157:H7 sampling as single combo lots; 45 seconds one half of combo with one side of the cloth, and 45 seconds other half of combo with the other side of the cloth. 4) Offal Sampling SOP (dated 1/1/26) for head meat, cheek meat, hearts, and salivary glands/ tongue trimmings for E. coli O157:H7. 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. 5) MT43 Sampling (dated 1/2/26) outlined monthly trim Top 7 STEC verification sampling. A negative E. coli O157:H7 test combo was randomly selected; 50 lbs. of trim grabbed and ground twice through an offline grinder; and minimum 375 gram grab sample taken.		
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
Comment: PMs included operation instructions.		
2	Preparation of the treatment solution(s)	Yes
Comment: PM instructions included preparation of treatments.		
3	Start up of the intervention equipment	Yes
Comment: PM instructions included start-up requirements.		
4	Shut down of the intervention equipment	Yes
Comment: PM 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: Lower limits were established in pre-requisite programs and CCPs and monitored via titrations.		
4.6.2	The establishment monitors the temperature of the treatment solutions.	Yes
Comment: Solution temperatures were monitored and logged on CCP and SOP records.		
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 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
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
Comment: Interventions were verified to be implemented per documented procedures during this assessment.		
4.7	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	Yes
Comment: The interventions were operated within the validation supporting documents.		
4.8	Alternate / Novel Interventions / Process Aids	
4.8.1	Is / Are there alternative intervention methods(s) being utilized other than those listed in the previous pages	No
Comment: No alternative intervention methods were used.		

5 Dressing Procedures / Critical Job Tasks

5	Dressing Procedures / Critical Job Tasks	
5.1	Is there an intervention or process aid utilized upon entering or exiting the out rail.	Yes
Comment: Lactic acid 2-10% was applied to carcasses prior to railing back in from the outtrail.		
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 (dated 6/9/26) 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: 180F hot water was used to sterilize handheld equipment. Chemical sanitizer could be used as back-up.		
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.	
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. Knife blade stays in the dip 1-2 seconds.	Yes
Comment: The knives and tools were sanitized in 180F water by dipping between carcasses and hide opening cuts. Knife rotation between carcasses at critical dress positions was recommended.		
5.4.2	Knife blade stays in the dip 2-3 seconds.	No
Comment: The knives and tools were sanitized in 180F water by dipping between carcasses and hide opening cuts. Knife rotation between carcasses at critical dress positions was recommended.		
5.4.3	Knife blade stays in the dip for 4-6 seconds.	No
Comment: The knives and tools were sanitized in 180F water by dipping between carcasses and hide opening cuts. Knife rotation between carcasses at critical dress positions was recommended. The staff were generally reliant on dipping and not rotating.		
5.4.4	Multiple knife rotation.	No
Comment: The knives and tools were sanitized in 180F water by dipping between carcasses and hide opening cuts. Knife rotation between carcasses at critical dress positions was recommended. The staff were generally reliant on dipping and not rotating.		
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: Trimmer knives (straight or whizzard) were sterilized between carcasses; these were 1-2 second dips.

5.6	There is an auditing / observation process for monitoring of critical job tasks	Yes
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Comment: Sanitary Dressing monitoring was conducted by QA that involved three carcasses per position every 30 minutes. Monitoring was conducted on the floor and not via cameras. Shadowed QA staff complete sanitary dress monitoring on the hide line. Completed electronic records for hide on and hide off were verified from the week of 7/6/26.

5.7	Type(s) of monitoring at the establishment:	
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5.7.1	Type(s) of monitoring at the establishment: Auditor	Yes
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Comment: FSQA staff monitored sanitary dressing every 30 minutes and recorded observations electronically.

5.7.2	Supervisor	Yes
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Comment: Supervisors provided oversight; not documented monitoring.

5.7.3	Video	Yes
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Comment: Video was not used for sanitary dress monitoring tasks.

5.7.4	Other -- List in Comments	Not Applicable
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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
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Comment: I, Noel DCruz, do not have a conflict of interest with this auditee.