

Audit Report

Beef Trim N60 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
Address:	17365 South Cole Road Kuna, Idaho 83634		

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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 hazard reasonably likely to occur in the HACCP programs and controlled via CCPs.		
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 facility used a multiple hurdle approach to control pathogens such as 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?
Lactic acid spray for pattern mark treatment	Concentration, pressure, coverage.
Hot water recirculated PECS carcass cabinet	Temperature, pressure, coverage.
Lactic acid outrail carcass manual spray	Concentration, pressure, coverage.
Hot water recirculated final carcass cabinet (CCP 2)	Temperature and coverage as CCP; pressure
Final Carcass LA, PAA, and/or ASC (CCP 3)	Concentration, temperature, pH (for ASC), and coverage as CCP; pressure.
Offal PAA, LA, or ASC (CCP 4)	Concentration, temperature, pH (for ASC), and coverage as CCP; pressure.
Hypobromous acid spray chill	Concentration, temperature, pressure, and coverage.

Fabrication Interventions

Fabrication Interventions	What parameters are monitored?
Pre-fabrication carcass ASC cabinet	Concentration, temperature, pressure, pH, and coverage.
Trimming and subprimals ASC cabinets prior to packaging	Concentration, temperature, pressure, 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 Dr. Alex Brandt, Chief Science Officer, Food Safety Net Services (FSNS).
Challenge Study	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.
Journal Article	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.

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 by K. Lim & A. Mustapha, J. Food Prot., 2004, Vol. 67, No. 2, pages 310-315.
Journal Article	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.

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

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 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 on one half of the combo with one side of the cloth, and 45 seconds on the other half of the 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 tested combo was randomly selected; 50 lbs. of trim grabbed and ground twice through an offline grinder; and minimum 375 gram grab sample taken.

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

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 (dated 1/1/26) was implemented.		
2.3	Facility produces box trim?	Yes
Comment: Boxed trim was produced.		
2.4	Written sampling program in place for box trim	Yes
Comment: MSD Micro Tally Cloth Sampling SOP (dated 1/1/26) was implemented.		
2.5	Facility produces FTB, BLBT, LTB, AMR or similar material?	No
Comment: Such products were not produced.		
2.6	Written sampling program in place for FTB, BLBT, LTB, AMR or 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: Tested head meat, cheek meat, hearts, and salivary glands/ tongue trimmings were produced.		
2.8	Written sampling program in place for other raw beef components	Yes
Comment: Offal Sampling SOP (dated 1/1/26) was implemented.		
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: The sampling programs were validated via scientific support. The site used the manual cloth method for combo and box trim, N60 excision method for variety meats. 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: 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. 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.		

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	Combo and box trim via the manual cloth method. Variety meats by N60 excision.

2.12 If procedure is modified from traditional excision, is there validation documentation? Yes

Comment: The validation support for the manual cloth method to traditional N60 excision was USMARC scientific publication, Novel Continuous and Manual Sampling Methods for Beef Trim Microbiological Testing by Dr. Tommy Wheeler and Dr. Terrance Arthur. 2018. J. of Food Protection, Vol. 81, No. 10, Pages 1605-1613.

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? No

Comment: Sample counts did not apply for the cloth method. Verification of sample counts for variety meats N60 excision did not occur.

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: Each cloth was weighed by the sampler and recorded on the Sample Tracking. The program did not establish a minimum weight gain. Direct observation of trim combo sampling was daily per sampler and results recorded on the Sample Tracking form. Variety meats samples were weighed for each lot by the sampler and recorded on the Sample Tracking. The target weight being 375-400 grams. The lab verified the sample weights.

2.15 Does sampling program target – where possible - surface tissue over internal tissue? Yes

Comment: The sampling program targeted surface tissue via manual cloth scrubbing and N60 excision.

2.16 Does sampling program require each excision sub-sample to be collected from distinctly different trim pieces? Yes

Comment: Offal excision sampling was to be collected from distinctly different pieces. This was not applicable for trim due to sampling method used.

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: Larger pieces were cut into manageable sizes to accommodate sampling. Tested 2-piece 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. No combo fill stations took longer than one production period to fill. All combo product was sampled via the manual cloth method, with no exceptions based on combo fill time. The site hand wrote the start fill time and the end time was the manifest label time.

2.19 OBSERVATION OF TRIM SAMPLING – Auditor should observe sample collection and report accuracy against specified method and SOP. Yes

Comment: Observed trim sampling and sampling SOP was followed.

2.20 Employees performing sampling programs are trained to complete sampling tasks and training is documented. Yes
Verification of employee sampling techniques are visually reviewed (direct observation) at an established frequency. Reviews are documented.

Comment: Samplers were trained when newly assigned and minimum annually. Verified recent sampler training logs from 2026 for samplers observed. Direct observation of trim combo sampling was daily per sampler and results recorded on the Sample Tracking. Direct observation of variety meats sampling was not conducted.

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 and lot sizes were supported with validation documents.

Lot Size

Type	Lot Size	Comment
Combo Trim	Combos	Single Combo
Box Trim	Boxes	35 boxes or less per pallet
Variety meats	Other	Production period per product type (head meat, cheek meat, hearts, and salivary glands/ tongue trimmings)

3 Verification Testing / Check Sample Program

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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: MT43 Sampling (dated 1/2/26) outlined monthly trim Top 7 STEC verification sampling. A negative E. coli O157:H7 tested combo was randomly selected; 50 lbs. of trim grabbed and ground twice through an offline grinder; and minimum 375 gram grab sample taken. Verification sampling of variety meats was not conducted.



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 verification sample was collected after receipt of the negative ECH7 combo result via the MSD cloth method. If the combo tested positive, a verification sample was not collected from that combo.	
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:	The verification samples were taken from ground product using the offline grinder.	
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:	Trim verification sampling was conducted monthly. Testing for the past 3 quarters was conducted on 1/7/26, 2/10/26, 3/12/26, 4/6/26, 5/14/26, 6/2/26, 7/9/26, and 8/11/26. All samples were negative for Top 7 STECs. Verification sampling of variety meats was not conducted.	
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:	Trim verification sampling was observed annually by third-party auditors; most recently on 9/2/26. These samples were analyzed by the routine third-party laboratory in Boise, Idaho.	
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:	Trim verification sampling was observed annually by third party auditors between April through September; most recently on 9/2/26 during this assessment. Lab testing was conducted at the usual third-party laboratory. Results reported directly to the customer (as requested).	
3.7	Aseptic technique being followed when performing verification testing.	Yes
Comment:	Aseptic technique was followed during the trim verification sampling.	
3.8	Where possible, surface tissue being targeted over internal tissue.	Not Applicable
Comment:	Not applicable based on the verification method used.	
3.9	Excision sub-samples are being collected from distinctly different pieces.	Not Applicable
Comment:	Not applicable based on the verification method used.	

3.10 List piece count of the final sample if applicable. Not Applicable

Comment: Not applicable based on the verification method used.

3.11 List weight of the final sample. Comment Only

Comment: 404 grams.

4 Testing Laboratory

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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 7/31/27 for biological analyses.

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 offsite by a contracted laboratory.

4.3 Controls to prevent pathogen contamination are in place. Not Applicable

Comment: Testing was conducted offsite by a contracted laboratory.

4.5 There is a program for running positive controls/cultures with documented records for all analyses. Yes

Comment: Positive controls were ran daily.

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: Proficiency testing was conducted annually and evaluated as part of the lab accreditation. Proficiency testing records were maintained by the laboratory.

5 Lab Methods

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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: All samples were enriched and tested intact for meat, slices, and cloth.

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 was not conducted.

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 was not conducted.

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 amplification method was used for E. coli O157:H7 testing.

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
Trim ECH7	PCR- BAX, 12.17, 10049, E. coli O157:H7 Exact RT, AOAC-RI-102003	8-12 hours, 42 +/- 2C, 1:5 dilution for meat or 200 ml for cloth.
Variety Meats ECH7	GDS Analysis 36.5, 10054, AOAC 2005.04 (ECH7 Tq)	8-12 hours, 42 +/- 2C, 1:5 dilution for meat
STECs	STEC PCR BAX RT 12.8, 10049, AOAC-RI-091301	8-10 hours, 42 +/- 2C, 1:5 dilution factor

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

Comment: Wet compositing was not conducted.

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

Comment: Presumptive positives were deemed positive.

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 the initial screen result. Wet compositing was not conducted.

5.9 Confirmation capability of the lab is validated. Yes

Comment: Cultural confirmation was conducted for data collection. Confirmation capability of the laboratory was validated through accreditation. Product disposition was made based on initial screen results.

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 (dated 1/1/26) explained procedures for managing event days.

6 Certificate of Analysis

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
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Comment: COAs were generated for every lot tested for ECH7. The lab COAs identified the lots covered by the test results. The site was Test and Hold and Test and Ship. The Test and Ship was to pre-identified customers with the understanding that would only receive the product with negative ECH7 COAs, any positives would return to the plant for disposition.

6.2	All laboratory results are subject to a minimum of a dual review and approval process.	Yes
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Comment: Lab results were subjected to a dual review and approval process.

6.3	Each Certificate of Analysis has its own unique number or identifier.	Yes
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Comment: Each COA had its own report number.

6.4	COA's that are revised indicate a revision date, revision reason and are traceable to the original COA.	Yes
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Comment: If a COA was revised, the report number would remain the same but the remarks section included the revision details.

6.5	The document clearly identifies that it is a Certificate of Analysis. List identifier.	Yes
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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
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Comment: The type of test and testing method was 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
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Comment: I, Noel DCruz, do not have a conflict of interest with this auditee.
