

Audit Report

Specified Risk Material Audit

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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Audit ID:	AO-015265
Audit Date:	September 04, 2026
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 defined in the Non-Ambulatory and Ante-Mortem Condemned Cattle SOP (dated 1/1/26). Downer cattle were stunned with a handheld captive bolt gun, bled, placed in the dead pen, denatured, and sent to the landfill. Downer cattle were not harvested for human food.	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 observed during the 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: Downers were tracked on Condemned Logs. Disposition was demonstrated via Landfill Receipts.	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 used. Captive bolt stunning was used via pneumatic or handheld gun.	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: Cattle were considered over thirty months (OTM) unless received as a 'young' lot. Dentition was conducted on young lots. A blue tag was applied to carcasses identified as under thirty months (UTM) and a yellow tag was applied to OTM carcasses evaluated via dentition; further, this age distinction was indicated on the carcass identification tags. Approximately 80% of the cattle harvested were OTM. Dentition was not conducted on 'old' lots and no tag distinction was used. UTM carcasses were sorted on separate rails after grading and fabricated as their own lots at the start of the fabrication day. Procedures were captured in the Dentition SOP, Slaughter SRM Job Positions SOP, and SRM Monitoring SOP. Operator practices were consistent with procedures.

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 outlined procedures for SRM identification, removal, segregation, and disposal. SRMs were addressed in accordance with 9 CFR 310.22. Operator practices were consistent with documented removal 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: BSE tested animals were condemned to landfill and not held pending results. There were no BSE tests in the past 12 months.

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: BSE tested animals were condemned to landfill and not held pending results. There were no BSE tests in the past 12 months.

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 lots on harvest and UTM carcasses on fabrication as separate lots first in the day. SRM SOPs prevented cross contamination by SRM between carcasses. Color coded equipment, dedicated sterilizers, and containers were designated for SRMs. Black handled tools were used for edible tissue. Black handled knife was used for tonsil removal basis that it cut around and not into the tonsils. White handled knife was used to cut the OTM spinal cord at head drop. Spinal vacuum handle was blue for UTM and yellow for OTM. There was no dedicated split saw for OTM and so the saw was opened up and rinsed out, sterilized in 180F water with the blade running, after splitting an OTM and prior to splitting a UTM. Tools and equipment used to remove SRMs were not used on edible tissue. Operator practices were consistent with procedures.

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 lots on harvest and UTM carcasses on fabrication as separate lots first in the day. SRM SOPs prescribed the use of dedicated sterilizers at all SRM removal stations. The sterilizers were verified to be labeled "SRM". There was no dedicated split saw for OTM and so the saw was opened up and rinsed out, sterilized in 180F water with the blade running, after splitting an OTM and prior to splitting a UTM. Operator practices were consistent with procedures.

7 Training

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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 involved with SRM procedures were trained when newly assigned and minimum annually thereafter. 2026 training logs were verified for randomly selected employees in SRM positions. Adequacy of training was assessed via job performance evaluations, program monitoring, and internal audit.

8 SRM Removal and Disposal

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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 plastic containers. SRMs were properly removed and disposed to landfill (brain and spinal cord) or onsite inedible rendering. Landfill disposal records were maintained.

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: Slaughter SRM Job Positions SOP addressed mis-splits. Mis-split carcasses were railed out and addressed with an offline well saw. The saw was rinsed out and sterilized in 180F water after use on OTM carcass and prior to use on UTM carcass. Mis-split carcasses were not present during the facility walk through.

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 from the tongue base manually by knife on the head chain and tonsil discarded for inedible rendering. The employee used a black handled knife on the basis that they did not cut through SRMs but around it.

10.2	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)	Compliant
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Comment: All heads were split and the brain vacuumed for landfill disposal. Spinal cord removed by vacuum tool and discarded to landfill. The head remnant (skull, eyes, trigeminal ganglia) was disposed to inedible rendering. The vertebral bones of OTM carcasses on fabrication floor were removed and discarded to inedible rendering. The bone-in forequarters shipped to the customer was addressed by the customer providing a Cow Chuck Supplier Letter of Guarantee (LOG) for every load shipped indicating that any SRMs were removed and properly disposed; the LOG for a load shipped on 8/25/26 was provided.

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
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Comment: 100 OTM carcass sides were verified on 9/2/26 to be free of spinal cord in the staging/grading cooler prior to fabrication.

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
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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 (small intestine) remained attached to the viscera set on the viscera table and was sent to inedible rendering. This was verified via SRM monitoring checks by QA 1x/period.

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
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Confirm the whizzard knives used for this task are of proper size.

Comment: The whizzard knife blade used to trim the vertebral regions was verified to be 2" in diameter. Disarticulation of the individual vertebra was not permitted.

13 Mechanically Separated Meat

13	Mechanically Separated Meat
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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 vertebral bones of OTM carcasses on fabrication floor were removed and discarded to inedible rendering. The bone-in forequarters shipped to the customer was addressed by the customer providing a Cow Chuck Supplier Letter of Guarantee (LOG) for every load shipped indicating that any SRMs were removed and properly disposed; the LOG for a load shipped on 8/25/26 was provided. Operator practices were consistent with established procedures.

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: Various internal audits were conducted daily by QA monitoring SRM identification, removal, segregation and disposal along the entire process (slaughter, offals, coolers, and fabrication) and results recorded on forms. Corrective actions were taken if deviations identified. Recent completed SRM monitoring logs were verified as follows: 1) SRM Harvest logs demonstrated one time per period monitoring; 2) SRM Fabrication logs demonstrated one time per period monitoring; 3) SRM Check daily of 100 sides in the sort cooler for spinal cord and dura. Operator practices during the facility walk throughs were consistent with established procedures.

16 Feed Ban

16	Feed Ban	
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. 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: Cattle were received with producer affidavits (Producer's Wholesomeness Certificate – Continuing Certificate) signed every 3 years, verifying compliance with 21 CFR 589.2000 and cattle to be ractopamine free. Verified current signed affidavits for 3 randomly selected producers from the daily kill line up from 9/1/26.	Compliant

17 Conflict of Interest

17	Conflict of Interest	
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. Comment: I, Noel DCruz, do not have a conflict of interest with this auditee and the audit has been carried out independently and impartially.	Yes