Audit Report

Beef Trim N60 Addendum

National Beef Packing Co., LLC. - Dodge City
2000 East Trail Street
Dodge City, Kansas 67801

Audit Date: October 06, 2023
Auditor: Lori Ernst

Audit Summary

Company Name:	National Beef Packing Co., LLC. - Dodge City	Company ID:	AUNATDOD
Address:	2000 East Trail Street Dodge City, Kansas 67801		

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Beef Trim -- N60 Addendum

1 Interventions for Pathogen Reduction

		Result
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 that was reasonably likely to occur in facility 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:	Interventions were defined as listed in chart in 1.3 and included hot water, hock vacuums, lactic acid, peracetic acid, and XG940.	

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?
Boneless Beef Peracetic, Final Carcass Peracetic, Pre-fabrication Peracetic, Head Peracetic (CCP) Heart Peracetic, Pre-evisceration Peracetic	Concentration
Carcass Latic Acid	Concentration, Temperature
XG940 in ground beef	Concentration
Wizard Knife Lactic Acid	Concentration, Temperature
Hot Water Wash (CCP)	Temperature, Coverage
Hock vacuums on skinning line	Operation

Fabrication Interventions

Fabrication Interventions	What parameters are monitored?
Peracetic used on chuck, primal, Transfer Hallway	Concentration

Trim Spray Peracetic	Concentration

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	Hot Water Wash #1 CCP EST 262 Dodge Plant Microbial Validation September 28, 2023. Hot Water Wash #2 CCP EST 262 Dodge Plant Microbial Validation September 28, 2023. Pre-Evisc Hot Water Wash Est 262 Dodge Plant Microbial Validation September 28, 2023 Head Hot Water Wash EST 262 Dodge Plant Microbial Validation September 28, 2023. Boneless Beef Peracetic Wash Est 262 Dodge City Plant Microbial Validation December 23, 2023 Trim Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation July 8, 2023 Head Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation April 9, 2023 Heart Peracetic Wash Est 262 Dodge City Plant Microbial Validation April 9, 2023 Carcass Pre-Eviscerations Peracetic Wash Est 262 Dodge City Plant Microbial Validation September 28, 2023 Chuck Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation July 8, 2023 Primal Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation July 8, 2023 Transfer Hallway Peracetic Wash Est 262 Dodge City Plant Microbial Validation September 30, 2023 Wizard Knife Lactic Acid Wash Est 262 Dodge City Plant Microbial Validation September 28, 2023 Carcass Lactic Acid Wash Est 262 Dodge City Plant Microbial Validation September 30, 2023 Final Peracetic Wash Est 262 Dodge City Plant Microbial Validation Boneless Beef Pre-Fabrication Peracetic Wash Est 262 Dodge City Plant Microbial Validation July 8, 2023Final Peracetic Wash

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

Generic *E. coli* swabs were collected from one out of every 300 carcasses processed. Carcass mapping swabs were collected at hide on, prior to pre evisceration cabinet, prior to final wash, after final wash, before the transfer cabinet, after the transfer cabinet, and after the pre fabrication cabinet for TPC, coliforms, and generic *E. coli*. Swabs were collected three times per shift from three carcasses; carcasses were swabbed on the round, chuck, and midline. Products identified as intended for raw ground use were sampled and tested per identified lot for *E. coli* O157:H7. Process Assessment sampling of such products for pSTEC was conducted monthly for both variety meats and boneless trim.

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: Trim was treated with peracetic acid on the trim belt prior to combo filling.

2 Sampling Programs for Products Destined for Raw, Ground

		Result
2.1	Facility produces combo trim?	yes
Comment:	Combo trim was produced.	
2.2	Written sampling program in place for combo trim	yes
Comment:	Sampling and Testing Procedures MTC Individual Combo Samples MicroTally Swab Combo Sampling and Testing Procedures	
2.3	Facility produces box trim?	no
Comment:	Box trim was not produced.	
2.4	Written sampling program in place for box trim	Not Applicable
Comment:	Box trim was not produced.	
2.5	Facility produces FTB, BLBT, LTB, AMR or similar material?	yes
Comment:	AMR was produced.	
2.6	Written sampling program in place for FTB, BLBT, LTB, AMRor similar material	yes
Comment:	Intermediate Lean Sampling Procedures E. coli O157:H7 was implemented.	
2.7	Facility produces other raw beef components (head meat, cheek meat, hearts, tongue root, etc.)?	yes
Comment:	Cheek meat, head meat, hearts, tongue root, and boneless beef were produced and tested.	
2.8	Written sampling program in place for other raw beef components	yes

Comment:	Offal N60 Sampling Procedures for *E. coli* O157:H7 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:	Mirco Tally was validated as statistically confident of 95% or better.	
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:	Trim was collected using MicroTally cloth manual method. Offal products used traditional excision sampling. AMR was sampled via N60 grab sample.	

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	Micro Tally for trim, N60 was used for variety meats, AMR samples were pulled at a defined frequency using a N60 grab sample.

2.12	If procedure is modified from traditional excision, is there validation documentation?	yes
Comment:	National Beef Dodge City Est 262 MARC manual Sampling Device Validation Study, April 27, 2018.	
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:	Sample counts were not applicable for Micro Tally. Variety meat sample counts were based on number of boxes produced using N60 and were documented.	
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:	Weights were verified for Micro Tally trim swabbing after each combo was sampled with a 5 g required pickup; weights were also verified on offal and AMR samples with targets defined.	
2.15	Does sampling program target – where possible - surface tissue over internal tissue?	yes
Comment:	Micro Tally method targets surface tissue by design.	
2.16	Does sampling program require each excision sub-sample to be collected from distinctly different trim pieces?	yes
Comment:	Offal samples were collected from distinctly different pieces of trim.	
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:	Sampling program included provisions for large product requiring pieces from the same product at least 12 inches apart.	

2.18	Is there a program in place to address the handling of lotting for slow fill versus fast fill combos?	yes
Comment:	Slow fill combos were not tested and diverted to a cooker.	
2.19	OBSERVATION OF TRIM SAMPLING – Auditor should observe sample collection and report accuracy against specified method and SOP.	yes
Comment:	Sampler performing Micro Tally sampling was performing task according to documented procedures.	
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 performing sampling were training in sampling protocol. Employee observed during this assessment was trained on August 16, 2023.	
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:	Lots were defined in sample protocols.	

Lot Size

Type	Lot Size	Comment
Combo	Combos	Single Combo
Variety Meats	Production Day	Production day
AMR	Production Day	Production Day

3 Verification Testing / Check Sample Program

		Result
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 performed monthly throughout the year.	
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:	Verification sample was taken at the same time as the Micro Tally sample. If initial sample was non-negative a new verification sample would be taken.	
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 taken from finished ground product. Core samples were ground three times 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 samples were taken monthly during each quarter. Trim: September 12, 2023, August 8, 2023, July 18, 2023, June 13, 2023, May 2, 2023, April 28, 2023, April 14, 2023, March 21, 2023, February 7, 2023, and January 18, 2023 Offal: September 12, 2023, August 8, 2023, July 18, 2023, June 13, 2023, may 2, 2023, April 12, 2023, March 21, 2023, February 7, 2023, January 18, 2023	
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 during this assessment and performed in accordance with established sampling program. Verification was sent to a third party laboratory.	
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 was performed in April 2023 and October 2023.	
3.7	Aseptic technique being followed when performing verification testing.	yes
Comment:	Aseptic technique was followed during the verification observation.	
3.8	Where possible, surface tissue being targeted over internal tissue.	Not Applicable
Comment:	Core samples were taken as verification samples.	
3.9	Excision sub-samples are being collected from distinctly different pieces.	Not Applicable
Comment:	Core samples were taken as verification samples.	
3.10	List piece count of the final sample if applicable.	Not Applicable
Comment:	Core samples were taken as verification samples.	
3.11	List weight of the final sample.	Comment Only
Comment:	425 grams	

4 Testing Laboratory

Result

Laboratory Information

Lab Name	Lab Location
National Beef	Dodge City, KS

List Accreditation and/or Third Party Audit & date.

Laboratory was A2LA accredited to ISO 17025:2017 valid through May 31, 2025.

4.2	If the testing for *E. coli* O157:H7 is on-site, the laboratory is physically isolated from production areas.	yes
Comment:	Testing was performed by a company owned laboratory that was not connected to the facility and acted independently. Laboratory was located in a separate building on the property.	
4.3	Controls to prevent pathogen contamination are in place.	yes
Comment:	Controls to prevent pathogen contamination were in place limiting access to the laboratory by outside personnel.	
4.5	There is a program for running positive controls/cultures with documented records for all analyses.	yes
Comment:	Negative control and process control were ran.	
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 performed quarterly through AOAC.	

5 Lab Methods

		Result
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:	Single combo lots were used and remained independently. Meat 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 was not used.	
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 used.	
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:	BAX PCR was used.	

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	BAX PCR, AOAC PTM 102003	
Method 2		

Method 3		

5.6	If method includes “wet” compositing, is the method validated?	Not Applicable
Comment:	Wet compositing was not used.	
5.7	Presumptive positives are deemed positive if not culturally confirmed.	yes
Comment:	Disposition was based on presumptive 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:	Disposition was based on presumptive results.	
5.9	Confirmation capability of the lab is validated.	Not Applicable
Comment:	The onsite laboratory did not confirm 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 Day Program was established for when non-negative rate is above the established control limit.	

6 Certificate of Analysis

		Result
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:	COAs were sent showing negative results, lots, and was applicable to product on the order.	
6.2	All laboratory results are subject to a minimum of a dual review and approval process.	yes
Comment:	Dual verification was used on COAs	
6.3	Each Certificate of Analysis has its own unique number or identifier.	yes
Comment:	Report number was the unique identifier on the COA.	
6.4	COA’s that are revised indicate a revision date, revision reason and are traceable to the original COA.	yes
Comment:	Revised COAs included the original document number under 'Supersedes' report number.	
6.5	The document clearly identifies that it is a Certificate of Analysis. List identifier.	yes
Comment:	Certificate of Analysis was the identifier on the COA.	
6.6	The type of test and testing method used are listed on the Certificate of Analysis.	yes
Comment:	Type of testing and testing method were included 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, Lori Ernst, do not have a conflict of interest with this auditee and the audit was carried out independently and impartially.