



Audit Report

Specified Risk Material Audit

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		

Contact Name:	Pat Mies
Contact Phone Number:	816-713-8547
Contact Email Address:	Pat.mies@nationalbeef.com

Audit ID:	AO-007091
Audit Date:	October 06, 2023
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Lori Ernst
Auditor Phone Number:	210-355-6937
Auditor Email Address:	lori.ernst@fsns.com

** 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

		Result
1.1	<p>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.</p> <p>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.</p> <p>Comment: Non-ambulatory/downer cattle were defined as those not able to enter the restrainer under their own power. In addition, “any cattle that cannot rise from a recumbent position or cannot walk, including but not limited to, those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral column, or metabolic conditions.” Downer cattle were euthanized and disposed of offsite.</p>	Compliant
1.2	<p>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.</p> <p>Comment: Downers were not present during this assessment.</p>	Compliant
1.3	<p>Determine if records are available to confirm compliance with this requirement through the documentation of downers and their subsequent disposition.</p> <p>Comment: Downers were tracked on the Pre-Requisite 21 – Downer Verification Form, and records from January 2023 to present were reviewed and demonstrated compliance.</p>	Compliant

2 Stunning

		Result
2.1	<p>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).</p> <p>Verify that air injection stunning is not being performed.</p> <p>Comment: Captive bolt stunning was used. Air injection stunning was not used at the facility</p>	Compliant

3 Age Identification

Result

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: Dentition was used for age determination. Carcass Age Determination pre-requisite program required carcasses identified as over 30 months (OTM) had a '3' stamped on the forequarter, face plate was sprayed with ink, and carcasses were segregated in the hot box and coolers. Vertebral column was sprayed with ink prior to grading. Operating practices were consistent with procedures.

4 SRM Removal/Segregation/Disposition

Result

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: Specified Risk Material Protocol defined SRMs for removal included brain, skull, eyes, trigeminal ganglia, vertebral column, and dorsal root ganglia for cattle OTM. Cattle of all ages the following SRMs were identified Distal Ileum of the small intestine, tonsils, spinal cord. SRM Protocol defined the removal of each identified SRM. Operator practices were consistent with established procedures during this assessment.

5 BSE Tested Animals

Result

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: Animals tested for BSE were not allowed in the facility and were disposed to a landfill.

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: Animals tested for BSE were not allowed in the facility and were disposed to a landfill.

6 Cross Contamination Prevention

		Result
6.1	<p>Programs exist to prevent cross contamination by SRM from carcass to carcass during production.</p> <p>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.</p> <p>Comment: Dedicated sterilizers were in place for knives used on edible tissue (black), OTM (red), and green for under 30 months (UTM green). Operator practices were consistent with established procedures. SRM tools were not used on edible tissue.</p>	Compliant
6.2	<p>Confirm: (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.</p> <p>Comment: Split saws were dipped in sterilizers after each head processed. Housings were opened and rinsed after a OTM carcass was cut. Operator practices were consistent with established procedures.</p>	Compliant

7 Training

		Result
7.1	<p>Employees responsible for all SRM related activities are adequately trained.</p> <p>Confirm: (i) Employee training and competency, (ii) Adequacy of training program, and (iii) Training records.</p> <p>Comment: Training was provided for personnel performing SRM removal tasks. Qualified personnel were given an SRM sticker for their hard hat. Training records for head droppers observed during this assessment were current.</p>	Compliant

8 SRM Removal and Disposal

		Result
8.1	<p>SRM is removed as potential source of contamination and disposed of according to 9 CFR 310.22(e).</p> <p>Confirm: (i) All SRM is properly labeled, segregated, and disposed of, and (ii) Records are available to verify ongoing compliance.</p>	Compliant

Comment: SRM was placed into containers marked as SRM, collected into a dumpster, and sent to land fill. Disposal records for the landfill were marked with CMPAF.

9 Mis-splits

		Result
9.1	Missplits are treated as potential sources of SRM introduction into food chain.	Compliant
<p>Confirm:</p> <p>(i) Documented procedures exist describing how missplits of the vertebral column are identified and handled to ensure removal of SRM, and</p> <p>(ii) Operator practices are consistent with these procedures.</p>		
<p>Comment: Mis-splits were addressed on the slaughter floor and railed out if necessary. Operator practices were consistent with established procedures.</p>		

10 Verification of SRM Removal

		Result
10.1	<p>Verification of SRM removal section.</p> <p>Line speed 300 head / hour or greater observe 100 sides; if line speed is less than 300 head / hour observe 50 sides.</p> <p>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)</p>	Compliant
<p>Comment: Knife trimming was used for the removal of tonsils.</p>		
10.2	<p>Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)</p>	Compliant
<p>Comment: Brains were vacuumed out of > 30 month heads prior to removal of cheeks and head meat. Brains were sent to a landfill, and heads were sent to inedible rendering.</p>		
10.3	<p>**Vertebral column - except the vertebrae of the tail, transverse processes of the thoracic and lumbar vertebrae, and wings of the sacrum in carcasses 30 months and older, (fabrication)**</p> <p>Observe all regions of the vertebral column on the bone belt for 10 minutes.</p>	Compliant
<p>Comment: Spinal cord was not observed during the 10 minute bone belt observations.</p>		
10.4	<p>**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)**</p>	Compliant
<p>Comment: Spinal cord was not observed during the 100 carcass side assessment of OTM in the sales cooler.</p>		

11 Distal Ileum Removal

Result

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 saved.

12 Whizzard Knives

Result

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: Whizzard knives were 2" in diameter.

13 Mechanically Separated Meat

Result

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: MSM 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: MSM was not produced.

14 Shipping

Result

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: OTM carcasses were ran at the end of second shift and vertebral column removed from products.



15 Self Audits

	Result
<p>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.</p> <p>Confirm:</p> <ul style="list-style-type: none">(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. <p>Comment: SRM Audits were completed daily for each SRM removal station on the slaughter floor and on the fabrication floor. Records from the week of July 17, 2023 were provided.</p>	Compliant

16 Feed Ban

	Result
<p>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.</p> <p>Confirm:</p> <ul style="list-style-type: none">(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. <p>Comment: Feed affidavits from the current week were provided.</p>	Compliant

17 Conflict of Interest

	Result
<p>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.</p> <p>Comment: I, Lori Ernst, do not have a conflict of interest with this auditee and the audit was carried out independently and impartially.</p>	yes