



Audit Report

Specified Risk Material Audit

National Beef Packing Co., LLC. - Liberal
1501 East 8th Avenue
Liberal, Kansas 67905

Audit Date: October 10, 2023
Auditor: Rudy Hernandez



Audit Summary

Company Name:	National Beef Packing Co., LLC. - Liberal	Company ID:	AUNATLIB
Address:	1501 East 8th Avenue Liberal, Kansas 67905		

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

Audit ID:	AO-007130
Audit Date:	October 10, 2023
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Rudy Hernandez
Auditor Phone Number:	970-405-0369
Auditor Email Address:	rudy.hernandez@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: Downer cattle were defined in Specified Risk Material Protocols as non-ambulatory cattle that were not able to enter the restrainer under their own power, any cattle that could not rise from a recumbent position or cannot walk, including but not limited to those with broken appendages, severed tendons, ligaments, nerve paralysis, fractured vertebral column, or metabolic conditions. Downer cattle were euthanized, aged through dentition, marked with an "X" if over 30 months of age, and sent to either an offsite rendering facility or a landfill, depending on the animal's age.</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 in pens at the time of the 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: Disposal of downers was documented on the Pre-Requisite Downer Verification Form and through rendering/landfill tickets. Records provided demonstrated program 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: Air injection stunning was not performed. The facility used captive bolt stunning.</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: Pre-Requisite Program #24, Carcass Age Determination, defined the process for age determination and identification of 30-month carcasses. Thirty-month-old cattle were identified by dentition before hide and head removal. Carcasses were stamped with a blue "3" on each chuck, and the head and neck were painted pink. After splitting, the thirty-month carcasses' vertebral column was sprayed with pink ink. Heads and tongues were identified with a red "30+" tag. Offal of 30 month, cattle were sprayed with ink. Observed practices were consistent with documented 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: Pre-Requisite Program #25, Specified Risk Material Protocol, defined procedures for removal of SRMs. Operator practices were consistent with documented removal procedures.

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: Cattle designated for BSE testing were euthanized and tested offsite. These animals did not enter the plant.

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: Cattle designated for BSE testing were euthanized and tested offsite. These animals did not enter the plant.

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:</p> <ul style="list-style-type: none">(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.	Compliant

Comment: Color-coded equipment and containers were designated for SRM removal and disposal for > 30-month materials. White hand tools and those identified with "SRM" tags were used for < 30-month carcasses. Blue hand tools and those identified with a "30" tag were used for > 30-month carcasses. Black-handled tools were designated for edible tissue. Grey containers were designated for inedible materials, and white containers were designated for edible materials. Red containers were used for SRM materials. Operator practices were consistent with requirements and SRM tools were not used on edible tissue.

6.2	<p>Confirm:</p> <ul style="list-style-type: none">(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.	Compliant
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Comment: The Prerequisite Program 25 Specified Risk Material Protocol specified that dedicated sterilizers were used to sanitize SRM tools. Designated split saws were used to split OTM cattle and were sanitized with 180F water as needed. If a UTM cattle split saw was utilized to separate OTM cattle, the saw was opened, and the blade and housing were cleaned, sanitized, and inspected by QA before subsequent use. Operator practices were consistent with documented procedures.

7 Training

		Result
7.1	<p>Employees responsible for all SRM related activities are adequately trained.</p> <p>Confirm:</p> <ul style="list-style-type: none">(i) Employee training and competency,(ii) Adequacy of training program, and(iii) Training records.	Compliant



Comment: Employees involved in handling SRMs or monitoring SRM removal were trained annually and as needed on 30-month cattle identification, SRM removal, disposal, and monitoring procedures. Training effectiveness was monitored through direct observation. Initial and annual training records from 2023 demonstrated program compliance.

8 SRM Removal and Disposal

Result

- 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: Designated containers were labeled for containment of SRMs pending disposal. Landfill and inedible rendering disposal records reviewed demonstrated program compliance.

9 Mis-splits

Result

- 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: Pre-Requisite Program 25, Specified Risk Material Protocol defined mis-split procedures. Mis-splits were identified with ink, opened using a dedicated saw at the final rail, and the spinal cord was removed before entering the hot box. Operator practices were consistent with documented procedures.

10 Verification of SRM Removal

Result

- 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: Palatine and lingual tonsils were removed via knife cut and were sent to inedible rendering. Verification of removal processes were made on 50 head, and all were correctly removed.

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- 10.2** Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter) Compliant

Comment: Brains were vacuumed out of > 30-month heads before the removal of cheeks and head meat. Brains were sent to a landfill, and heads were sent to inedible rendering.

10.3 **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)**
Observe all regions of the vertebral column on the bone belt for 10 minutes.

Compliant

Comment: Spinal cord was not observed during a ten-minute bone belt verification.

10.4 **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

Comment: Spinal cord was not observed during a 100-side assessment of greater than 30-month carcasses.

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: The distal ilium was removed using a 120" measuring guide and was sent to inedible rendering. The process was verified by QA every 30 minutes during production. This process was demonstrated and was performed in compliance with regulations. Records reviewed from the week of 4/26/23 demonstrated compliance.

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: Wizard knives used to trim the vertebral column were greater than two inches 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: Such was not performed at the site.

15 Self Audits

Result

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: Monitoring of stunning procedures was conducted once per shift. Dentition procedures, SRM tool usage, dedicated sterilizers, and SRM material removal/disposal procedures were verified on three carcasses every thirty minutes of production. Verification of segregated storage and processing was performed daily. Verification of the AMR production process was performed every 30 minutes. The use of properly sized wizard knives was verified once per shift. Monitoring records reviewed from the week of 4/26/23 demonstrated program compliance. Operator practices were consistent with written procedures.

16 Feed Ban

Result

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.

Compliant

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: Livestock Owner Certificates were signed annually by cattle suppliers to verify compliance with regulatory requirements for prohibited ruminant feed materials. Three current certificates reviewed from the kill lineup demonstrated program compliance.



17 Conflict of Interest

Result

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.

yes

Comment: I, Rudy Hernandez, do not have a conflict of interest with this auditee.