Audit Report

Beef Trim N60 Addendum

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

Audit Date: July 09, 2024
Auditor: Brent Knedler

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

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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 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:	PAA, lactic acid, Bacteriophage, hot water, and hock vacuums were utilized.	

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
Wizard Knife Lactic Acid	Concentration
Hot Water Wash (CCP)	Concentration, Temperature
Hock vacuums on skinning line	Operation
Bacteriophage applied to live cattle	Monthly viability sample

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.
In-house Validation	Hot Water Wash #2 CCP EST 262 Dodge Plant Microbial Validation September 28, 2023.
In-house Validation	Pre-Evisc Hot Water Wash Est 262 Dodge Plant Microbial Validation September 28, 2023
In-house Validation	Head Hot Water Wash EST 262 Dodge Plant Microbial Validation September 28, 2023.
In-house Validation	Boneless Beef Peracetic Wash Est 262 Dodge City Plant Microbial Validation 04/10/2024
In-house Validation	Trim Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation 07/08/2023
In-house Validation	Head Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation 04/08/2024
In-house Validation	Carcass Pre-Eviscerations Peracetic Wash Est 262 Dodge City Plant Microbial Validation 09/28/2023
In-house Validation	Chuck Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation 12/14/2023

In-house Validation	Primal Spray Peracetic Wash Est 262 Dodge City Plant Microbial Validation 04/27/2024
In-house Validation	Transfer Hallway Peracetic Wash Est 262 Dodge City Plant Microbial Validation 09/23/2023
In-house Validation	Wizard Knife Lactic Acid Wash Est 262 Dodge City Plant Microbial Validation 09/28/2023
In-house Validation	Carcass Lactic Acid Wash Est 262 Dodge City Plant Microbial Validation 09/30/2023
In-house Validation	Final Peracetic Wash Est 262 Dodge City Plant Microbial Validation Boneless Beef 09/28/2023
In-house Validation	Pre-Fabrication Peracetic Wash Est 262 Dodge City Plant Microbial Validation 09/28/2023
In-house Validation	Carcass Pre-Evisceration Peracetic Wash Est 262 Dodge City Plant Microbial Validation 09/28/2023

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? Yes
Note if facility treats trim or trim belts prior to sorting, boxing, or comboing of product.

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

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:	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
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, AMR or 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:	MircoTally 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 the MicroTally cloth manual method. Offal products used traditional excision sampling. AMR was sampled via an 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 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 was provided.

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 MicroTally. Variety meat sample counts were based on five boxes, and 12 pieces per box were produced using N60 and 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 MicroTally trim swabbing after each combo was sampled using a 5 gram pickup on the cloth. Target offal and AMR sample weights were 375g to 450g with a target of 375g for each sample type.

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

Comment: Micro Tally method and traditional excision targeted 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: The sampling program included provisions for large products requiring pieces from the same product to be 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 were 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 trained in the sampling protocol. The employee observed during this assessment was trained in 2024. Weekly procedures verifications were documented. Records from March 2024 were reviewed and demonstrated compliance.	

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 were supported within sampling plans.	

Lot Size

Type	Lot Size	Comment
Combo Trim	Combos	Single Combo
AMR	Production Day	Production Day
Variety Meat (except Hearts)	Production Day	Production Day
Hearts	Production Shift	Production Shift

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:	Verification sampling was performed monthly for combo trim and variety meats throughout the year. AMR was not tested during the verification.	

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:	A verification sample was taken at the same time as the sample. If the 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. Samples were ground two times prior to 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. Trim: 7/18/23, 8/8/23, 9/12/23, 10/5/23, 11/14/23, 12/29/23, 1/16/24, 2/27/24, 3/12/24, 04/12/2024, 05/07/2024, 06/25/2024 Offal: 7/18/23, 8/8/23, 9/12/23, 10/17/23, 11/14/23, 12/19/23, 1/16/42, 2/27/24, 3/12/24, 04/03/2024, 05/08/2024, 06/26/2024.	
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 October 2023, April 2024, and during this assessment.	
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:	426 grams	

4 Testing Laboratory

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Laboratory Information

Lab Name	Lab Location

National Beef Dodge City	Dodge City, KS
Food Safety Net Services	Dodge City, KS

List Accreditation and/or Third Party Audit & date.

The National Beef Laboratory was A2LA accredited to ISO 17025:2017 valid through May 31, 2025. FSNS 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 and records maintained.	
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

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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:	Single combo lots were used and remained independently.	
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 *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
Method 1	BAX PCR, AOAC PTM 102003	200 ml (cloth), 1:5 dilution (meat), temperature 42C, 8-10 hours.
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 on site 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 dated 10/05/2020 was established for when non-negative rate is above the established control limit.

6 Certificate of Analysis

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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, Brent Knedler, do not have a conflict of interest with this auditee and the audit has been carried out independently and impartially.	