



Audit Report

Specified Risk Material Audit

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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Audit ID:	AO-008879
Audit Date:	July 09, 2024
Audit Type:	Unannounced
Audit Result:	Passed

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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	<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 not being 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. Cattle exhibiting these conditions were knocked, pithed, denatured, and sent to a landfill for disposal.</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 the past six months were reviewed and demonstrated compliance.</p>	Compliant

2 Stunning

2	Stunning	
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

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: Dentition was used for age determination. The Carcass Age Determination pre-requisite program required carcasses identified as over 30 months (OTM) to have a '3' stamped on the forequarter. The face plate was sprayed with ink, and carcasses were segregated in the hot box and coolers. The vertebral column was sprayed with ink prior to grading. Operating 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: The Specified Risk Material Protocol defined SRMs for removal, including the brain, skull, eyes, trigeminal ganglia, vertebral column, and dorsal root ganglia for cattle that were OTM. For cattle of all ages, the following SRMs were identified: the Distal Ileum of the small intestine, tonsils, and spinal cord. The protocol defined the removal of each identified SRM. Operator practices were consistent with established procedures during this assessment.

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: 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

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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: 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.

6.2 Compliant

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.

Comment: Split saws were dipped in sterilizers after each head was processed. Housings were opened and rinsed after an OTM carcass was cut. 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 defined processes.

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: 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.

8 SRM Removal and Disposal

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

9 Mis-splits

9	Mis-splits	
9.1	Missplits are treated as potential sources of SRM introduction into food chain. 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: Missplits were addressed on the slaughter floor and railed out if necessary. Operator practices were consistent with established procedures.	Compliant

10 Verification of SRM Removal

10	Verification of SRM Removal	
10.1	Verification of SRM removal section. 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: Knife trimming was used for the removal of tonsils.	Compliant
10.2	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter) 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.	Compliant
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. Comment: Spinal cord was not observed during the 10 minute bone belt observations.	Compliant

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 the 100 carcass side assessment of OTM in the sales cooler.

11 Distal Ileum Removal

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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: Distal ileum was removed by a procedure that removed at least 120 inches of the uncoiled and trimmed small intestine. Measuring and removal were observed during the assessment.

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

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

Comment: Whizzard knives were 2" in diameter, at a minimum.

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: 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

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

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: SRM Audits were completed daily for each SRM removal station on the slaughter floor and the fabrication floor. Records from the week of 3/25/24 and July 2024 were provided.

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. 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: Feed affidavits from the current week were provided.

17 Conflict of Interest

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

