



# Audit Report

## Specified Risk Material Audit

**Missouri Prime Beef Packers**  
5305 Highway H  
Pleasant Hope, Missouri 65725

**Audit Date:** April 07, 2021  
**Auditor:** Lori Ernst



## Audit Summary

Company Name:	Missouri Prime Beef Packers	Company ID:	AUMISPRI
Address:	5305 Highway H Pleasant Hope, Missouri 65725		

Contact Name:	Frank McLaughlin
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Audit ID:	AO-001409
Audit Date:	April 07, 2021
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Lori Ernst
Auditor Phone Number:	210-355-6937
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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

		Result
<b>1.1</b>	<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: Downers were defined as an animal that went down prior to the knock box. Xylazine was used on animals as an anesthetic for animals not intended for animal food. Once sedated animals were knocked by trained personnel. Material was not intended for animal food.</p>	Compliant
<b>1.2</b>	<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.</p>	Compliant
<b>1.3</b>	<p>Determine if records are available to confirm compliance with this requirement through the documentation of downers and their subsequent disposition.</p> <p>Comment: Animals have not been euthanized in pens since harvest started. Xylazine Administration Log was used to track down and euthanized animals. Carcasses were sent to the dump.</p>	Compliant

### 2 Stunning

		Result
<b>2.1</b>	<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: Pneumatic knocking guns or hand held captive bolt knocking guns were used for stunning animals. Air injected stunning was not used.</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: Currently the site used scheduling and age verification documentation to identify age of carcasses. If age verification was not available carcasses were treated as over 30 months of age.

#### 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: BSE/ SRM/ CMPAF SOP was in place to address BSE risks associated with SRM material. Yellow or red handled knives were used on SRM material and black handled knives on edible tissue. Brains were removed from heads. Intestines, tonsils, and other materials were not currently salvaged.

#### 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: BSE/ SRM/ CMPAF SOP was in place to address BSE risks associated with SRM material. Procedure stated animal tested for BSE was disposed of in accordance with 9 CFR 309.13. Animals had not been tested for BSE at the facility.

**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: BSE/ SRM/ CMPAF SOP was in place to address BSE risks associated with SRM material. Procedure stated animal tested for BSE was disposed of in accordance with 9 CFR 309.13. Animals had not been tested for BSE at the facility.

## 6 Cross Contamination Prevention

Result

**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: Red or yellow handled knives were used on SRM material and black handled knives on edible tissue. Dedicated sterilizers were present for SRM tools. Dedicated split saws were in place for over 30 month carcasses and under 30 month carcasses.

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**6.2** 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.

Compliant

Comment: Red or yellow handled knives were used on SRM material and black handled knives on edible tissue. Dedicated sterilizers were present for SRM tools. Dedicated split saws were in place for over 30 month carcasses and under 30 month carcasses.

## 7 Training

Result

**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: SRM training for personnel removing SRM material was completed on February 22, 2021. Training records were provided.

## 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: Brains removed from heads were placed into containers labeled SRM. Receipt was provided for disposal of SRM material to landfill.

## 9 Mis-splits

		Result
<b>9.1</b>	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: Mis-splits were corrected with a handheld saw or other device. Observed practices were consistent with established procedures.	

## 10 Verification of SRM Removal

		Result
<b>10.1</b>	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.	Compliant
	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: Tongues or other head meat were not saved at the time of the observation.	
<b>10.2</b>	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)	Compliant
	Comment: Brains were removed from heads, spinal cord vacuumed and sent to landfill.	
<b>10.3</b>	**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: Bones collected in combo on fabrication floor were observed for spinal cord. Number of bones observed were equal to 10 minute bone belt observation. Spinal cord was not observed.	
<b>10.4</b>	**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: Fourteen sides of over thirty month carcasses were observed in the cooler. Spinal cord was not observed.	

## 11 Distal Ileum Removal

Result

- 11.1** Verify the measurement by observing the facility perform their verification check. Not Applicable

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 salvaged at time of assessment.

## 12 Whizzard Knives

Result

- 12.1** Whizzard knives used to trim all vertebral regions must have a blade that is  $\geq 2$  inches in diameter. Disarticulation of the individual vertebra is not permitted. Not Applicable

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

Comment: Whizzard knives were not used on trim in fabrication.

## 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). Not Applicable

Observe to see if MSM is being produced.

Comment: MSM was not produced.

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- 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. Not Applicable

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: Finished product did not contain bone in product if produced from over 30 month carcasses.

## 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: Verification of SRM removal was completed daily. Each SRM station were equipped with inedible cans for disposal.

## 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: Feed ban affidavits were provided for two loads of animals slaughtered on the day of the assessment.

## 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, Lori Ernst, do not have a conflict of interest with this auditee.