



# Audit Report

## Specified Risk Material Audit

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

**Audit Date:** April 21, 2022  
**Auditor:** Mark Sarratt



## Audit Summary

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

Contact Name:	Megan McLaughlin
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Audit ID:	AO-003355
Audit Date:	April 21, 2022
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Mark Sarratt
Auditor Phone Number:	308-325-6063
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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
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, and sent to either an offsite rendering facility or a landfill depending on the age of the animal.</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 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: Thirty month cattle were identified by dentition prior to hide and head removal. Carcasses were stamped with a blue "3" on each carcass, and the head was stamped. After splitting, the vertebral column of thirty month carcasses were sprayed with blue 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: Procedures for removal of SRMs were defined in the site Specified Risk Manual and included procedures for all listed SRMs.

#### 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
<p><b>6.1</b> Programs exist to prevent cross contamination by SRM from carcass to carcass during production.</p> <p>Confirm:</p> <p>(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</p> <p>(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 color coded tools were used at stations where SRM tissues were contacted. Tools were sanitized in dedicated 180 F sterilizers.</p>	Compliant

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<p><b>6.2</b> Confirm:</p> <p>(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</p> <p>(ii) Operator practices are consistent with these procedures.</p> <p>Comment: Split saws were cleaning and sanitized at frequency to prevent buildup of organic debris. Complete cleaning and sanitizing of saws was required before splitting an under 30 month carcass.</p>	Compliant
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## 7 Training

	Result
<p><b>7.1</b> Employees responsible for all SRM related activities are adequately trained.</p> <p>Confirm:</p> <p>(i) Employee training and competency,</p> <p>(ii) Adequacy of training program, and</p> <p>(iii) Training records.</p> <p>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 2022 demonstrated program compliance.</p>	Compliant

## 8 SRM Removal and Disposal

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

Comment: SRM was contained in color coded containers and conveyed to landfill disposal daily. Compliance was verified through daily monitoring by QA personnel.

## 9 Mis-splits

	Result
<p><b>9.1</b> Missplits are treated as potential sources of SRM introduction into food chain.</p> <p>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.</p> <p>Comment: Mis splits were identified with ink, opened using a dedicated saw at the final rail, and the spinal cord was removed prior to entering the hot box. Operator practices were consistent with documented procedures.</p>	Compliant

## 10 Verification of SRM Removal

	Result
<p><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.</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> <p>Comment: Fifty heads were observed for proper tonsil removal which was performed with a knife cut. The process were performed in compliance with regulation.</p>	Compliant
<p><b>10.2</b> Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)</p> <p>Comment: Brains and spinal cord from over thirty month animals were sent to landfill. Skulls, eyes, trigeminal ganglia, and dorsal root ganglia were removed and sent to rendering.</p>	Compliant
<p><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.</p> <p>Comment: Spinal cord was not observed during a ten minute bone belt verification.</p>	Compliant
<p><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)**</p> <p>Comment: Spinal cord was not observed during a 100 side assessment of &gt; thirty month carcasses in the coolers.</p>	Compliant

## 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 saved for edible purposes at the time of this audit.

## 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 in use at the time of this assessment.

## 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: Boneless products were fabricated from thirty month carcasses with total removal of the spinal column. Operator practices were consistent with written procedures. Proper application of these requirements was audited by QA with results documented.



## 15 Self Audits

	Result
<p><b>15.1</b> 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"><li>(i) Documented procedures exist for the self auditing program,</li><li>(ii) Operating practices are consistent with these procedures, and</li><li>(iii) Documentation or records of these events is maintained.</li></ul> <p>Comment: Self audits were performed daily by QA personnel to verify removal and disposal of SRMs throughout the slaughter and fabrication processes.</p>	Compliant

## 16 Feed Ban

	Result
<p><b>16.1</b> 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"><li>(i) Documented procedures exist for obtaining necessary documentation from the feedlots/feeders, and</li><li>(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.</li></ul> <p>Comment: Livestock Owner Certificates were signed annually by cattle suppliers as verification of compliance to regulatory requirements pertaining to prohibited ruminant feed materials. Three current certificates reviewed from the kill lineup demonstrated program compliance.</p>	Compliant

## 17 Conflict of Interest

	Result
<p><b>17.1</b> 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, Mark Sarratt do not have a conflict of interest with this auditee and the audit has been carried out independently, and impartially.</p>	Yes