



# Audit Report

## Specified Risk Material Audit

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

**Audit Date:** March 21, 2023  
**Auditor:** Tamara DeFord



## 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-005823
Audit Date:	March 21, 2023
Audit Type:	Unannounced
Audit Result:	Passed

Auditor Name:	Tamara DeFord
Auditor Phone Number:	(210) 606-8735
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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:</p> <ul style="list-style-type: none"> <li>(i) Correctly define a downer, and</li> <li>(ii) Adequately describe how downers are handled to ensure they are excluded from production.</li> </ul> <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 pneumatic and 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: Animals received were identified as Over Thirty Months (OTM). Dentition and age documentation were not applicable. Operating practices were consistent with requirements.

#### 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: The BSE/SRM/CMPAF SOP (5/10/2021) outlined removal of SRMs brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column, dorsal root ganglia, tonsils, and distal ileum. Operators were observed in compliance with company 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: The BSE/SRM/CMPAF SOP (5/10/2021) stated that animals chosen by for BSE testing were euthanized and sent to an off site renderer whom was an approved testing site. 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: The BSE/SRM/CMPAF SOP (5/10/2021) stated that animals chosen by for BSE testing were euthanized and sent to an off site renderer whom was an approved testing site. These animals did not enter the plant. Testing had not occurred in the previous twelve months.

## 6 Cross Contamination Prevention

		Result
<b>6.1</b>	<p>Programs exist to prevent cross contamination by SRM from carcass to carcass during production.</p> <p>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.</p> <p>BSE/SRM/CMPAF SOP (5/10/2021) outlined red color coded tools and dedicated 180F sterilizers were used for removal of SRMs. Black handled knives were used on edible tissue; red handled equipment was utilized for SRM purposes on OTM cattle. SRM tools were not observed used on edible tissues. Operator practices were in compliance with company procedures.</p>	Compliant
<b>6.2</b>	<p>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.</p> <p>Comment: BSE/SRM/CMPAF SOP (5/10/2021) outlined red color-coded tools and dedicated 180F sterilizers were used for removal of SRMs. Split saws had 180 F water running through the saw and were sprayed off after every carcass or after retains with a dedicated hose for absence of residues. Tools were not observed used on edible tissues. Operator practices were in compliance with company procedures.</p>	Compliant

## 7 Training

		Result
<b>7.1</b>	<p>Employees responsible for all SRM related activities are adequately trained.</p> <p>Confirm:            (i) Employee training and competency,            (ii) Adequacy of training program, and            (iii) Training records.</p> <p>Comment: Training for personnel involved with SRM removal and monitoring were trained annually at minimum. Competency was evaluated through a quiz administered after training and through internal audits. Records from January 2023 demonstrated compliance.</p>	Compliant

## 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: BSE/SRM/CMPAF SOP (5/10/2021) outlined SRMs removed into dedicated and color coded red containers and removed to an offsite renderer. Invoices were provided from March 2023 documenting weights of SRM materials removed from the site.

## 9 Mis-splits

	Result
<b>9.1</b> Missplits are treated as potential sources of SRM introduction into food chain. <span style="float: right;">Compliant</span>	
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 railed out on the kill floor and corrected by removing SRM material using dedicated equipment prior to leaving the kill floor. Mis-split carcasses were not present in the carcass chilling coolers. Observed practices were consistent with written 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. <span style="float: right;">Compliant</span>	
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 by knife excision on the head chain.	
<b>10.2</b> Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter) <span style="float: right;">Compliant</span>	
Comment: Brains and spinal cord from over thirty month animals were sent to landfill. Skulls, eyes, trigeminal ganglia, dura matter, and dorsal root ganglia were removed and sent to rendering.	
<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)** <span style="float: right;">Compliant</span>	
Observe all regions of the vertebral column on the bone belt for 10 minutes.	
Comment: Spinal cord was not observed during a ten minute bone belt verification.	
<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)** <span style="float: right;">Compliant</span>	



Comment: Spinal cord was not observed during a 100 side assessment of > thirty month carcasses in the coolers.

### 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 ≥ 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 used for the removal of trimmings from 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).

Not Applicable

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.

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). Not Applicable

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: Vertebral bone in primals and sub primals were not produced. Operating practices were consistent with these requirements.

## 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: The FSQA conducted an inspection of three head inspection once per period for verification of spinal cord and dura matter removal, removal of tonsils, proper disposal of heads. Additionally, vacuum pressure was verified greater than 15 in. of Hg in the spinal vacuums. The SRM Removal Verification form was utilized to document the inspections.

Fabrication documented a ten carcass check for spinal cord and dura mater once per period documented on the processing form. Operators were observed in compliance with company 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 as verification of compliance to regulatory requirements pertaining to prohibited ruminant feed materials. Three current certificates reviewed from the kill lineup demonstrated program compliance.

Raw Material Specifications outlined the requirements for incoming cattle including raw materials were of bovine origin from the US, and cattle met the requirements of 21 CFR 589.2000 and were not fed feed containing ruminant components. Livestock Market Certificates were required from Cattle Suppliers demonstrating compliance. Three certificates from the current cattle lineup were reviewed.

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