

## **Specified Risk Material Audit**

Company:	Iowa Premium, LLC		February 9, 2017			
Facility Physical Address:	3337 L Ave, Tama, IA 52339					
Company Contact / Title:		Mikel Gager/ Food Safety Manager				
Contact Phone Number:	614.484.2220 ext. 2307	Fax Number:	614.484.5481			
Email Address:		mgager@iowapremium.com				
Additional Contacts:						
Establishment Number:	M8	Evaluator:	Alyssa McMahan			
Audit Number:	5170044	<u>_</u>				
** Red	•	te an Automatic Failure if found Non-Compliances a re-audit in 60 days.	int **			
	<b>Evaluation Outco</b>	<u>ome</u>				
All I	Requirements Compliant?	Yes				
Automatic Failure	<b>Requirements Compliant?</b>	Yes				
	Re-audit required?	No				



			Compliant	
Requirement	Task	Method	(Yes/No)	Comments
No Downers- a 'downer' is considered to be <u>an</u> 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.	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.	Document review	Yes	The BSE Risk Minimization/SRM Removal Program was implemented for handling of SRMs at the facility. A downer was defined as a conscious non-ambulatory animal which was included in the Humane Handling SOP.
	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.	Direct observation	Yes	Pens observed did not have downers present.  Downers were documented on Ante Mortem  Cards when observed.
	<u> </u>	Document review	3.7	Downers were documented on the Ante Mortem Card in the barn office. Downers were sent to rendering.
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).		Direct observation and employee inquiry		Air injected stunning was not conducted at the facility. Captive bolt stunning was conducted by the facility.
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.	(i) documented procedures exist for the identification and segregation of carcasses / animals identified as over 30 months by	Document review and direct observation		Over 30 month cattle were identified with a "30" stamp and a yellow card which contained a "30" which was outlined in the BSE Risk Minimization/SRM Removal Program.



			Compliant	
Requirement	Task	Method	(Yes/No)	Comments
Facility has established procedures to ensure	Confirm	Document		The BSE Risk Minimization/SRM Removal
complete removal, segregation, and	(i) documented procedures exist for the removal of all defined	review and		Program outlined use of removal of tonsils,
disposition of Specified Risk Material (SRM)	SRM, and	direct		distal ileum, spinal cord, and heads (brains,
from edible products.	(ii) operator practices are consistent with these procedures.	observation		eyes and skull). Red handled knives were used
SRM are defined as brain, skull, eyes,				to remove SRM material. Dedicated sterilizers
trigeminal ganglia, spinal cord, vertebral				were utilized for sanitizing of SRM removal
column (except the vertebrae of the tail,			Yes	utensils. Employees observed removing SRMs
transverse processes of the thoracic and			1 68	were in compliance with the program.
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)).				
A · I d · · · I C DCD		Б		C 16 DCF
Animals that are tested for BSE are not	Confirm segregation and/or hold procedures (e.g., positive release)	Document		Carcasses tested for BSE were not permitted
utilized unless a negative test result is	exist for all BSE test animals.	review	Yes	in the facility and sent directly to landfill.
obtained.			103	
Segregation procedures are identified to	Ensure (i) carcasses are clearly identified and segregated in the	Direct		Carcasses tested for BSE were not permitted
minimize the potential for cross -	chiller (cooler), (ii) all other parts of the animal are identified and	observation		in the facility and sent directly to landfill.
contamination by animals that enter the facility	segregated, and (iii) traceability / disposition records are available	and	Yes	
if they have been tested for BSE.	for BSE test animals.	document		
		review		
		I	<u> </u>	



			Compliant	
Requirement	Task	Method	(Yes/No)	Comments
Programs exist to prevent cross contamination by SRM from carcass to carcass during production.	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.	Document review and direct observation	Yes	Red handled knives were used to remove SRMs of animals greater than 30 months of age. Yellow handled knives were used to remove SRMs on animals less than 30 months of age. Dedicated sterilizers were located at each SRM removal area for sanitizing of utensils. Red and yellow handled knives were not permitted to be used on edible tissue.
	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.	Document review and direct observation	Yes	The BSE Risk Minimization/SRM Removal Program documented use of dedicated sterilizers for SRM removal utensils. Split saws were opened and cleaned with 180F water after splitting an over 30 month carcass.



			Compliant	
Requirement	Task	Method	(Yes/No)	Comments
Employees responsible for all SRM related activities are adequately trained.		Employee inquiry and document review	Yes	Training on the BSE Risk Minimization/SRM Removal Program was conducted for employees removing SRM materials. Training records from 2016 were reviewed.
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.	Direct observation and document review	1 05	SRMs were removed from animals and placed in designated yellow SRM totes and removed to landfill. Records from the landfill were provided stating placement of materials in landfill.
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.	Document review and direct observation	Yes	Missplits were railed out so that the spinal column could be opened and cleared.
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)	Direct observation	Yes	Palatine tonsils were removed using knife removal methods. Lingual tonsils were removed using skinning machines.
	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older. (slaughter)	Direct observation	Yes	Spinal cord, dorsal root ganglia, brains, skulls and eyes were observed being properly removed during the audit.
	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)	Direct observation	Yes	During the 10 minute assessment on the bone belt, spinal cord was not observed.



			Compliant	
Requirement	Task	Method	(Yes/No)	Comments
	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)	Direct observation	Yes	100 over 30 month sides were observed in coolers with no observations of spinal cord.
Verify the measurement by observing the facility perform their verification check.	Distal ileum of the small intestines from carcasses of all ages. The 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)	Direct observation	Yes	Distal ileum was observed being properly removed during the audit. Intestine tables had markings on the table for verification of 80 inches of removal.
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.	Confirm the whizzard knives used for this task are of proper size.	Direct observation	Yes	Whizzard knives were not used to trim vertebral columns.
Mechanically separated meat (MSM) is not performed at the facility or used in production of human food (9 CFR 319.5).	Observe to see if MSM is being produced.	Direct observation	Yes	MSM was not produced.
	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.	Direct observation and document review	Yes	MSM was not produced.



			Compliant	
Requirement	Task	Method	(Yes/No)	Comments
contain vertebral columns from cattle 30 months of age and older to another federally	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.	Direct observation and document review	Yes	Product from over 30 month cattle was not shipped with vertebral column.
A program detailing the self auditing procedures used by the facility to verify the removal and disposal of the SRMs exists and is implemented.	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.	Direct observation and document review	Ves	SRM audits were performed once per hour of production on 10 carcasses for spinal cord, tonsil removal, head/brain removal, and disposal of SRMs. Distal ileum removal monitoring was conducted once per shift on five intestines. Monitoring records from the week of 12/12/16 were reviewed.
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.	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.	Document review.	Yes	Affidavits were provided from suppliers stating animals had not been fed with ruminant animal components. Affidavits were reviewed for Lanesboro Sales Commission, Robert Venner farm and NFO Members Livestock.
Conflict of Interest Declaration	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.	I, Alyssa McN	∕Iahan, do no	t have a conflict of interest with this auditee.