



Specified Risk Material Audit

Company: Iowa Premium Foods, LLC **Date:** February 7, 2019

Facility Physical Address: 3337 L Ave, Tama, IA 52339

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Establishment Number: 8 **Evaluator:** Mark Sarratt

Audit Number: 5181044

**** Requirements listed in *Bold and Italics* Denote an Automatic Failure if found Non-Compliant ****
An Audit Failure requires a re-audit in 60 days.

Evaluation Outcome

All Requirements Compliant? No

Automatic Failure Requirements Compliant? No

Re-audit required? Yes

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Requirement	Task	Method	Compliant (Yes/No)	Comments
<i>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.</i>	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.
	Inspect all pens to see if downers are present. If downers are present, observe that proper disposition is occurring and <i>appropriate documentation is being completed.</i>	Direct observation	Yes	Pens verified did not have downers present. Downers were documented on the Drive Alley Logs.
	Determine if records are available to confirm compliance with this requirement through the documentation of downers and their subsequent disposition.	Document review	Yes	Drive Alley Logs were presented for confirmation of downers, DOAs, and confirmed disposition.
<i>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).</i>	Verify that air injection stunning is not being performed.	Direct observation and employee inquiry	Yes	Air injected stunning was not used at this location.

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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.	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.	Document review and direct observation	Yes	Dentition was performed on heads post slaughter and carcasses identified as over 30 months of age were marked with a "30" stamp on the hindquarter and forequarter to facilitate identification. Operator practices were consistent with written procedures.
Facility has established procedures to ensure complete removal, segregation, and disposition of Specified Risk Material (SRM) from edible products. 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.	Document review and direct observation	Yes	The BSE Risk Minimization/SRM Removal Program defined procedures for removal of tonsils, distal ileum, spinal cord, and heads (brains, eyes and skull). Red handled knives were used to remove SRM material. Dedicated sterilizers were used for sanitizing of SRM removal utensils. Employees were removing SRMs in compliance with the written program.
<i>Animals that are tested for BSE are not utilized unless a negative test result is obtained.</i>	Confirm segregation and/or hold procedures (e.g., positive release) exist for all BSE test animals.	Document review	Yes	Carcasses tested for BSE were not permitted in the facility and were sent directly to landfill.

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Requirement	Task	Method	Compliant (Yes/No)	Comments
Segregation procedures are identified to minimize the potential for cross - contamination by animals that enter the facility if they have been tested for BSE.	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.	Direct observation and document review	Yes	Carcasses tested for BSE were not permitted in the facility and were sent directly to landfill.
<i>Programs exist to prevent cross contamination by SRM from carcass to carcass during production.</i>	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.
Employees responsible for all SRM related activities are adequately trained.	Confirm (i) employee training and competency, (ii) adequacy of training program, and (iii) training records.	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 2018 were reviewed for the operators responsible for removal of SRMs.
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	Yes	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. SRMs removed from over 30 month cattle were stored in red containers and also were removed to landfill.

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Requirement	Task	Method	Compliant (Yes/No)	Comments
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. Operator practices met program requirements.
<i>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.</i>	Tonsil removal - palatine and lingual from carcasses of all ages. Lingual tonsils may be removed via hand knife trimming or use of a <i>skinning machine.</i> (slaughter)	Direct observation	Yes	Palatine tonsils were removed using a dedicated straight knife. Lingual tonsils were removed using a skinner.
	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 properly removed in accordance with plant policy 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.
	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	Spinal cord was not observed on the 100 head of over 30 month sides that were assessed in the carcass cooler.
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.

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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.	Confirm the whizzard knives used for this task are of proper size.	Direct observation	No	Whizzard knives were not used to trim vertebral columns.
<i>Mechanically separated meat (MSM) is not performed at the facility or used in production of human food (9 CFR 319.5).</i>	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	No	MSM was not produced.
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).	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	Carcasses identified as > 30 months of age were processed as a group under facility grade change identification procedures and fabricated into 100% boneless subprimals to insure removal of spinal columns and diversion of this material to landfill.
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	Yes	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 12/03/18 were reviewed.
<i>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.</i>	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. Producer Affidavits associated with the audit trace exercise were reviewed and were accurate.
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, Mark Sarratt, do not have a conflict of interest with this auditee.		