



Audit Report

Specified Risk Material Audit

Harris Ranch Beef Company
16277 South McCall Avenue
Selma, California 93662

Audit Date: September 30, 2022
Auditor: Scott Devitt



Audit Summary

Company Name:	Harris Ranch Beef Company	Company ID:	AUHARRIS
Address:	16277 South McCall Avenue Selma, California 93662		

Contact Name:	Emily Krage
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Audit ID:	AO-004480
Audit Date:	September 30, 2022
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Scott Devitt
Auditor Phone Number:	712-662-1324
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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">(i) Correctly define a downer, and(ii) Adequately describe how downers are handled to ensure they are excluded from production. <p>Comment: The Non-Ambulatory Disabled Cattle SOP defined a downer as an animal that cannot rise from a recumbent position or that cannot walk, including, but not limited to, those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral columns, or metabolic conditions. The SOP stated that animals that became non-ambulatory were humanely euthanized and disposed to an offsite renderer.</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 observed.</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: Documented pick up weights were available from the off-site rendering company. Records were reviewed from 9/15/22 and found acceptable.</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 injected stunning was not permitted or performed. Pneumatic or handheld captive bolt guns were utilized.</p>	Compliant

3 Age Identification

Result



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|------------|---|-----------|
| 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: In accordance with the SRM SOP age was verified by dentition. Carcasses over 30 months of age (OTM) had a 'S' stamp on the forequarter and on the cheeks, blue ink on the fore shanks and on the vertebral column. OTM carcasses were stored on separate rails and processed at the end of the production shift. Observed practices were consistent with written procedures.

4 SRM Removal/Segregation/Disposition

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|------------|---|-----------|
| | | Result |
| 4.1 | 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)). | Compliant |

Confirm:

- (i) Documented procedures exist for the removal of all defined SRM, and
- (ii) Operator practices are consistent with these procedures.

Comment: The SRM SOP defined SRM as the 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 as well as additional customer specific requirements. The SOP detailed the methods for removal and disposal of SRM. Observed practices were consistent with written procedures.

5 BSE Tested Animals

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| | | Result |
| 5.1 | Animals that are tested for BSE are not utilized unless a negative test result is obtained.

Confirm segregation and/or hold procedures (e.g., positive release) exist for all BSE test animals. | Compliant |

Comment: BSE testing was not conducted. Suspect BSE animals were not allowed in the facility and were sent to the landfill.

5.2	<p>Segregation procedures are identified to minimize the potential for cross - contamination by animals that enter the facility if they have been tested for BSE.</p> <p>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.</p>	Compliant
Comment:	BSE testing was not conducted. Suspect BSE animals were not allowed in the facility and were sent to the landfill.	

6 Cross Contamination Prevention

Result		
6.1	<p>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>	Compliant
Comment:	<p>SRM SOP stated black handled knives were used for edible tissue and white (UTM) or blue (OTM) handled knives used to sever the spinal cord. A dedicated split saw with dedicated sterilizer was used for over 30-month carcasses (OTM). Spinal cord vacuums for OTM had blue hoses and vacuums for under 30-month carcasses (UTM) had black handles. Observed practices were consistent with written procedures. SRM tools were not observed used on edible tissues.</p>	
6.2	<p>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>	Compliant
Comment:	<p>The SRM SOP stated dedicated sterilizers were used at the head drop, spinal cord vacuum, and at the out rail. The dedicated split saw had a dedicated sterilizer. Split saws had continuously running hot water and were opened and rinsed with 180F water when visibly contaminated. Observed practices were consistent with written procedures.</p>	

7 Training

Result		
7.1	<p>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>	Compliant



Comment: Employees with SRM related responsibilities were trained initially and annually. Training was conducted in alchemy. Quizzes were built into the system. In addition to training, audits are performed daily by FSQA verifying proper procedures were followed during operations. Training records were verified for several SRM related positions that was completed 5/12/22 and 7/28/22.

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: SRMs were collected in black containers marked CMPAF and were sent to inedible rendering or to the landfill. Landfill and rendering weight slips were available indicating compliance.

9 Mis-splits

Result

9.1 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: Per the SRM SOP, mis-splits correction in the harvest area prior to entering the carcass cooler was required. Observed practices were consistent with written procedures.

10 Verification of SRM Removal

Result

10.1 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: Tonsils were removed by hand knife.

10.2 Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)

Compliant

Comment: Brain and spinal cord were removed by vacuum. TRG, DRG, eyes, and skulls were sent to inedible rendering.



10.3	**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
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Comment: Spinal cord was not observed in a 10-minute sample on the bone belt.

10.4	**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
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Comment: Spinal cord was not observed in a 100-carcass side sample.

11 Distal Ileum Removal

Result

11.1	Verify the measurement by observing the facility perform their verification check.	Compliant
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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: A 40" mark on a table was used to measure 80" of intestine to facilitate distal ileum removal by hand knife. Observed practice was compliant with the facility's procedure.

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.	Not Applicable
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Confirm the whizzard knives used for this task are of proper size.

Comment: Whizzard knives were not used on the vertebral column.

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
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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
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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: Over 30 month carcasses or parts containing vertebral column were not shipped from the facility. Carcasses identified as over 30 months were processed as boneless.

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: Spinal Cord/Sheath/DRG Removal Audit - Cooler monitoring was completed daily on 20 head. Spinal Cord/Sheath/DRG Removal Audit - Harvest was completed on 60 head daily to verify removal of spinal cord and sheath. 30 Month Segregation Verification Log was completed on 10 head three times daily to verify age segregation SRM Handling Verification Log was completed on 10 head three times daily to verify removal and disposal of SRMs at tonsil, spinal cord removal, and age segregation. Observed practices were consistent with written requirements. Records reviewed from the week of 6/27/22 demonstrated compliance.

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: Letter of Self-Certification were on file indicating cattle were not fed banned materials. Certificates for three suppliers received from that day 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, Scott Devitt, do not have a conflict of interest with this auditee.