



Audit Report

Specified Risk Material Audit

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

Audit Date: August 06, 2024
Auditor: Michael Sanders



Audit Summary

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

Contact Name:	Emily Krage
Contact Phone Number:	559.896.3081 x5473
Contact Email Address:	emily.krage@harrisranchbeef.com

Audit ID:	AO-009057
Audit Date:	August 06, 2024
Audit Type:	Unannounced
Audit Result:	Passed

Auditor Name:	Michael Sanders
Auditor Phone Number:	214-972-7736
Auditor Email Address:	mike.sanders@fsns.com

** 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

1	Downers	
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: The Animal Welfare Manual defined a non-ambulatory animal as an animal that could not rise from a recumbent position or walk under its own power. Non-ambulatory animals were euthanized, denatured, and sent to the landfill.</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 during this 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: Downers and their subsequent disposition were recorded on the Non-Ambulatory Disabled Cattle Log.</p>	Compliant

2 Stunning

2	Stunning	
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 utilized. The site used captive bolt stunning for euthanasia.</p>	Compliant

3 Age Identification

3	Age Identification	
----------	--------------------	--

- 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: Age was determined by dentition according to the Specified Risk Material SOP. Animals identified as over 30 months by dentition were identified with blue ink on the head and on each of the chucks. Observed practices were consistent with written procedures.

4 SRM Removal/Segregation/Disposition

4 SRM Removal/Segregation/Disposition

- 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: Specified Risk Material SOP explained procedures for segregation and removal of SRM. Brains of carcasses identified as over 30 months were removed by vacuum. Skulls were then split for inspection, and the skull, eyes, TRG, and brain were disposed to the landfill. Spinal cord was removed by vacuum and disposed to the landfill. The vertebral column was removed by knife trimming and sent to inedible rendering. Tonsils and distal ileum were removed by knife trimming and sent to inedible rendering. Observed practices were consistent with written procedures.

5 BSE Tested Animals

5 BSE Tested Animals

- 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: BSE tested animals did not enter the facility. If an animal was tested for BSE, testing was conducted offsite and the carcass was sent to the landfill.



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: BSE tested animals did not enter the facility. If an animal was tested for BSE, testing was conducted offsite and the carcass was sent to the landfill.

6 Cross Contamination Prevention

6 Cross Contamination Prevention

6.1 Programs exist to prevent cross contamination by SRM from carcass to carcass during production. Compliant

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.

Comment: Color coded equipment was used for severing the spinal cord. Black handled knives could only be used on edible tissue. White or blue handled knives were used to sever the spinal cord. Observed practices were consistent with written procedures and SRM tools were not used on edible tissue.

6.2 Compliant

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.

Comment: Dedicated sterilizers were used at the head drop, tonsil removal, split saw, and spinal cord removal. Split saws were opened and rinsed free of organic material after splitting five head or if buildup was observed. Observed practices were consistent with written procedures.

7 Training

7 Training

7.1 Employees responsible for all SRM related activities are adequately trained. Compliant

Confirm:
(i) Employee training and competency,
(ii) Adequacy of training program, and
(iii) Training records.

Comment: SRM training was conducted annually for employees with responsibilities related to SRM. The most recent annual training occurred 2/16/24.

8 SRM Removal and Disposal

8	SRM Removal and Disposal	
8.1	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. Comment: SRM was collected in dedicated color coded containers and transferred to collection bins destined for the landfill. Landfill disposal records were available indicating compliance.	Compliant

9 Mis-splits

9	Mis-splits	
9.1	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. Comment: Mis-splits were railed out and corrected on the outrail using dedicated equipment. Observed practices were consistent with written procedures.	Compliant

10 Verification of SRM Removal

10	Verification of SRM Removal	
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. 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 knife trimming and sent to inedible rendering.	Compliant
10.2	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter) Comment: Brains of over 30 month carcasses were vacuumed. Over 30 month skulls were split, inspected, and sent to the landfill with eyes and TRG intact. DRG was removed by chine saw and sent to inedible rendering. Spinal cord was removed by vacuum and sent to the landfill.	Compliant

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

Comment: Vertebral column was removed by knife trimming and sent to inedible rendering. Spinal cord was not observed during a 10 minute assessment of all regions of the vertebral column 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

Comment: Spinal cord was not observed during a 100 carcass side assessment in the chilling cooler.

11 Distal Ileum Removal

11 Distal Ileum Removal

11.1 Verify the measurement by observing the facility perform their verification check. Compliant

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: Approximately 88" of small intestine removal was observed during the verification check.

12 Whizzard Knives

12 Whizzard Knives

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 were not used to trim vertebral regions.

13 Mechanically Separated Meat

13 Mechanically Separated Meat

13.1 Mechanically separated meat (MSM) is not performed at the facility or used in production of human food (9 CFR 319.5). Compliant

Observe to see if MSM is being produced.

Comment: MSM was not produced at the site.



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. Compliant

Comment: MSM was not produced at the site.

14 Shipping

14 Shipping

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: The site shipped over 30 month bone in vertebral column. The customer inspected the product for SRM and disposed of it according to regulatory requirements if it was observed. A Cow Chuck Supplier Letter of Guarantee was returned to the site indicating proper disposal. A completed letter 5/22/24 was provided indicating compliance.

15 Self Audits

15 Self Audits

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 were completed three times per shift. SRM Handling Verification Log was completed on 10 head three time daily. >30 Month Segregation Verification Log was completed two times daily.

16 Feed Ban

16 Feed Ban

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: Feed Yard Supplier Agreement letters were available for three feeders on the current day lineup.

17 Conflict of Interest

17 Conflict of Interest

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: Michael Sanders
