



# Audit Report

Specified Risk Material Audit

**Caviness Beef Packers - Hereford**

3255 U.S. Highway 60  
Hereford, Texas 79045

**Audit Date:** November 12, 2024

**Auditor:** Tamara DeFord



## Audit Summary

Company Name:	Caviness Beef Packers - Hereford	Company ID:	AUCAVHER
Address:	3255 U.S. Highway 60 Hereford, Texas 79045		

Contact Name:	Jorge Aleman
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Audit ID:	AO-009855
Audit Date:	November 12, 2024
Audit Type:	Annual audit
Audit Result:	Passed

Auditor Name:	Tamara DeFord
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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

<b>1</b>	Downers	
<b>1.1</b>	<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 Non-Ambulatory and Ante Mortem Condemned Cattle SOP defined a downer animal as one that could not walk or rise from a recumbent position on its own accord. Downer cattle were euthanized and disposed of through a landfill.</p>	Compliant
<b>1.2</b>	<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
<b>1.3</b>	<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 disposition were tracked on the Outside Livestock Condemned Log. Invoices from the landfill were available.</p>	Compliant

### 2 Stunning

<b>2</b>	Stunning	
<b>2.1</b>	<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 utilized. The site used captive bolt guns for euthanasia.</p>	Compliant

### 3 Age Identification

<b>3</b>	Age Identification	
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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: The Dentition SOP explained cattle over 30 months of age were identified through dentition prior to the head removal step during fed cattle production runs. OTM fed cattle were identified with a yellow tag, UTM fed cattle were identified with a blue tag. Cull cows and bulls harvested during commercial cattle runs were all considered OTM. Operator practices were consistent with documented SRM procedures.

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## 4 SRM Removal/Segregation/Disposition

**4** SRM Removal/Segregation/Disposition

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**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 Slaughter SRM Job Positions and the Fabrication Job Positions outlined removal requirements for SRM materials. Operator practices were consistent with documented procedures.

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## 5 BSE Tested Animals

**5** BSE Tested Animals

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**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: If an animal was tested for BSE, the carcass was disposed to the landfill and did not enter the facility.

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**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: If an animal was tested for BSE, the carcass was disposed to the landfill and did not enter the facility.

## 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: Slaughter SRM Job Positions explained a white handled knife was utilized for SRM removal and disarticulation of OTM cattle. A white handled knife with a blue zip tie was utilized for SRM removal and disarticulation in UTM cattle, and black handled equipment was utilized for edible tissue. Operator practices were consistent with documented procedures and SRM removal tools were not observed used on edible tissue.

**6.2** Confirm: Compliant  
(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: Sterilizers SOP explained dedicated sterilizers were utilized for SRM equipment sanitation. Split saws were equipped with 180F water which was continuously running through the saw. Split saws were also opened, and debris was removed from the blade and housing between splitting of OTM and UTM carcasses. Operator practices were consistent with documented 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: Training was conducted annually for team members responsible for SRM removal and monitoring. Records from 2024 were available which evidenced program compliance. Training adequacy was verified through daily monitoring of removal and monitoring processes. Employees trained in SRM removal and monitoring processes were identified with a SRM sticker on their hard hat.

## 8 SRM Removal and Disposal

<b>8</b>	SRM Removal and Disposal	
<b>8.1</b>	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.	Compliant
	Comment: Slaughter SRM Job Positions explained red containers were designated for SRM removal. Invoices were maintained for removal of SRMs through a landfill.	

## 9 Mis-splits

<b>9</b>	Mis-splits	
<b>9.1</b>	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.	Compliant
	Comment: Mis-splits were railed out and corrected prior to leaving the slaughter floor. Observed practices were consistent with documented procedures.	

## 10 Verification of SRM Removal

<b>10</b>	Verification of SRM Removal	
<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.  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)	Compliant
	Comment: Tonsils were removed via knife cut and were disposed to inedible rendering.	
<b>10.2</b>	Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)	Compliant
	Comment: Heads were plugged after hide removal. After processing, heads were split, and brains were removed by vacuum. Heads, trigeminal ganglia, and spinal cords were disposed of through a landfill. Dorsal root ganglia was disposed to inedible 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)** Observe all regions of the vertebral column on the bone belt for 10 minutes.	Compliant
	Comment: Spinal cord was not observed during the ten-minute bone belt assessment.	

**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 inspection of 100 over thirty-month carcass sides 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: Small intestine was not harvested. Distal ileum remained attached to the viscera set and was sent to inedible rendering.

## 12 Whizzard Knives

**12**      Whizzard Knives

**12.1**      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.      Compliant

Confirm the whizzard knives used for this task are of proper size.

Comment: Whizzard knives used to trim the vertebral column were 2" in diameter.

## 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.

**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.

## 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: Customer specific requirements explained bone in chucks with vertebral columns attached were shipped to one specific customer. The site sent A Verification of Vertebral Column Disposition to the customer. The customer responded with a Cow Chuck Supplier Certificate of Analysis. The documents included purchase order number, receiving date, SRM disposal date, and verification signatures. Records reviewed evidenced compliance.

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## 15 Self Audits

**15** Self Audits

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**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: SRM Checks Slaughter was conducted on five head once per production period to verify head drop, tonsil removal, spinal cord and dura removal, small intestine disposal, CMPAF acceptable, water temperature at sterilizers and saws, dentition, and identification tag application. SRM Checks Fabrication was completed hourly on ten carcasses and chucks and included verification of carcass and chuck acceptability including removal of spinal cord and dura, whizzard checks, bone belt checks, bone truck checks, and end check. Records reviewed evidenced program compliance. Operator practices evidenced program compliance.

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## 16 Feed Ban

**16** Feed Ban

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**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 Market/ Dealers Wholesomeness Certificate or Producer's Wholesomeness Certificate were signed by cattle suppliers and maintained on file as acknowledgement of 21 CFR 589.2000 requirements. Signed certificates from three suppliers were provided and evidenced program compliance.

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## 17 Conflict of Interest

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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.

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