



# Audit Report

## Specified Risk Material Audit

**Iowa Premium, LLC**  
3337 L Avenue  
Tama, Iowa 52339

**Audit Date:** November 14, 2023  
**Auditor:** Curtis Pittman



## Audit Summary

Company Name:	Iowa Premium, LLC	Company ID:	AUNATIOW
Address:	3337 L Avenue Tama, Iowa 52339		

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Audit ID:	AO-007424
Audit Date:	November 14, 2023
Audit Type:	Unannounced
Audit Result:	Passed

Auditor Name:	Curtis Pittman
Auditor Phone Number:	
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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:            (i) Correctly define a downer, and            (ii) Adequately describe how downers are handled to ensure they are excluded from production.</p> <p>Comment: The Iowa Premium Cattle Welfare Program explained non-ambulatory cattle were those that could not enter the restrainer under their own power, in addition to any cattle that could not rise from a recumbent position or could not walk, including but not limited to those with broken appendages, severed tendons, ligaments, nerve paralysis, fractured vertebral columns, or metabolic conditions. Such cattle were euthanized and disposed of through an offsite 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: Non-ambulatory cattle were not present in the pens 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: The euthanasia of non-ambulatory cattle was tracked on the Iowa Premium Euthanized Cattle Verification Form. Completed forms were provided for August 2023, which demonstrated program compliance</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 injection stunning was not performed; the site utilized captive bolt stunning.</p>	Compliant

## 3 Age Identification

		Result
		Result

**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: Carcass Age Determination defined the process for age determination and identification of 30 month carcasses. Thirty month cattle were identified by dentition prior to hide and head removal. Carcasses were stamped with a blue "3" on each chuck, and the head and neck were painted pink. After splitting, the vertebral column of thirty month carcasses were sprayed with pink ink. Heads and tongues were identified with a red "30+" tag. Observed practices were consistent with documented procedures.

#### 4 SRM Removal/Segregation/Disposition

Result

**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 Protocol defined requirements for removal and disposal of SRM materials. Operator practices were consistent with program requirements.

#### 5 BSE Tested Animals

Result

**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: Animals designated for BSE testing did not enter the facility per the BSE Animal Surveillance Testing Plant Policy.

**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: Animals designated for BSE testing did not enter the facility per the BSE Animal Surveillance Testing Plant Policy.

## 6 Cross Contamination Prevention

	Result
<p><b>6.1</b> Programs exist to prevent cross contamination by SRM from carcass to carcass during production.</p> <p>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.</p> <p>Comment: Specified Risk Material Protocol explained color coded equipment, and containers were designated for SRM removal, and disposal for &gt; 30 month materials. Yellow hand tools and those identified with "SRM" tags were used for &lt; 30 month carcasses. Red hand tools and those identified with a "30" tag were used for &gt;30 month carcasses. Black handled knives were used to trim edible tissue. Grey containers were designated for inedible materials, white containers were designated for edible materials, red containers were designated for &gt;30 month inedible material. Operator practices were consistent with documented procedures, and SRM tools were not observed used on edible tissue</p>	Compliant
<p><b>6.2</b> 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.</p> <p>Comment: The Specified Risk Material Protocol explained split saws were opened and the housing and blades were rinsed free of organic matter with 180° F water after splitting an OTM carcass, prior to splitting an UTM carcass. Saws were also dipped into 180°F water prior to splitting of the next carcass. Dedicated sterilizers were utilized for SRM equipment and were labeled as such. Operator practices were consistent with documented procedures.</p>	Compliant

## 7 Training

	Result
<p><b>7.1</b> Employees responsible for all SRM related activities are adequately trained.</p> <p>Confirm:            (i) Employee training and competency,            (ii) Adequacy of training program, and            (iii) Training records.</p> <p>Comment: Employees involved in handling SRMs or monitoring SRM removal were trained annually and as needed on 30 month cattle identification, SRM removal, disposal, and monitoring procedures. Training effectiveness was monitored through direct observation. Initial and annual training records from 2023 demonstrated program compliance</p>	Compliant

## 8 SRM Removal and Disposal

	Result
<p><b>8.1</b> SRM is removed as potential source of contamination and disposed of according to 9 CFR 310.22(e).</p> <p>Confirm:            (i) All SRM is properly labeled, segregated, and disposed of, and            (ii) Records are available to verify ongoing compliance.</p> <p>Comment: Designated containers were labeled for containment of SRMs pending disposal. Landfill and inedible rendering disposal records reviewed demonstrated program compliance.</p>	Compliant

## 9 Mis-splits

	Result
<p><b>9.1</b> Missplits are treated as potential sources of SRM introduction into food chain.</p> <p>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.</p> <p>Comment: Specified Risk Material Protocol defined mis-split procedures. Mis-splits were identified with ink, opened using a dedicated saw at the final rail, and the spinal cord was removed prior to entering the hot box. Operator practices were consistent with documented procedures.</p>	Compliant

## 10 Verification of SRM Removal

	Result
<p><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.</p> <p>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)</p> <p>Comment: Palatine and lingual tonsils were removed via knife cut, and were sent to inedible rendering. Verification of removal processes were made on 50 tongues and all were removed properly.</p>	Compliant
<p><b>10.2</b> Brain, skull, eyes, trigeminal ganglia, spinal cord, and dorsal root ganglia from carcasses 30 months and older, (slaughter)</p> <p>Comment: Brains were vacuumed out of &gt; 30 month heads prior to removal of cheeks and head meat. Brains were sent to a landfill, and heads were sent to inedible rendering.</p>	Compliant
<p><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.</p> <p>Comment: Spinal cord was not observed during a ten minute bone belt verification.</p>	Compliant

- 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 the assessment of 100 (72 UTM and 28 OTM) carcass sides in the cooler.

## 11 Distal Ileum Removal

- Result**
- 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: The distal ilium was removed using a 80" measuring guide and was sent to inedible rendering. The process was verified by QA every 30 minutes during production. This process was demonstrated and was performed in compliance with regulation.

## 12 Whizzard Knives

- Result**
- 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: Wizard knives were not used to trim 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).      **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

**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). 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: Bone-in products were not produced from >30 month carcasses.

## 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: Monitoring of stunning procedures was conducted once per shift. Dentition procedures, SRM tool usage, usage of dedicated sterilizers, and SRM material removal/disposal procedures were verified on three carcasses every thirty minutes of production. Verification of segregated storage and processing was performed daily. Monitoring records reviewed from the week of 8/21/23 demonstrated program compliance. Operator practices were consistent with written procedures.

## 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: Iowa Premium Black Angus Cattle Supplier Affidavit was provided from three suppliers from the daily harvest lineup and evidenced compliance with 21 CFR 589.2000 requirements.

## 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, Curtis Pittman, do not have a conflict of interest with this auditee and the audit has been carried out independently and impartially.