

# Animal Welfare Audit BEEF\*

*for:*

**Walt's Wholesale Meats, Inc:  
Woodland, WA**

**Report Date  
May 27, 2010**

**Audit by  
Dragoslav Pavlovic**

**Silliker, Inc.**

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\*Criteria for this audit are based on "Recommended Animal Handling Guidelines and audit Guide, 2007 edition" published by the American Meat Institute Foundation.

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## ANIMAL WELFARE AUDIT: BEEF

<b>Company Name: Parent Company:</b>	Walt's Wholesale Meats, Inc: Woodland, WA	<b>Audit Date:</b>	May 27, 2010
		<b>Start &amp; End Time:</b>	12:00 AM - 2:00 PM
<b>Plant Address:</b>	350 Pekin Road Woodland, Washington 98674	<b>Silliker Auditor:</b>	Dragoslav Pavlovic dragoslav.pavlovic@silliker.com
<b>Primary Contact:</b>	Jason Houser, Program Manage	<b>Telephone:</b>	360-225-7433
<b>Email:</b>	waltsmeatsinc@comcast.net	<b>Fax:</b>	360-225-6196
<b>USDA est #:</b>	Est# 6423	<b>Line Speed:</b>	34
<b>Pass/Fail:</b>	Pass	<b>Was religious slaughter performed during the audit?</b>	<b>No</b>
		<b>Was conventional slaughter performed during the audit?</b>	<b>Yes</b>

<b>AUDIT SUMMARY - ANIMAL SURVEY</b>		
<b>AMI Core Criteria</b>	<b>Passing Score</b>	<b>Score</b>
Electric Prodding	25% or less prodded	0%
Vocalization	3% or less (conventional) 5% or less (ritual or with use of head holder)	3%
Slips and Falls	Truck unload - 1% or less falls 3% or less slips In plant - 1% or less falls 3% or less slips	0% 0% 0% 0%
Stunning Accuracy	95% or greater accuracy	97%
Bleed Rail Insensibility	100% Insensible	100%
Access to water	Yes, water provided	Yes
Willful acts of Abuse	No willful acts of abuse	No

**Auditor Signature:**

Dragoslav Pavlovic 708-704-3516; dragoslav.pavlovic@silliker.com

**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

**AUDIT SUMMARY**

<b>Category</b>	<b>Possible Points</b>	<b>Actual Points</b>	<b>Percentage</b>
III. Observations	30	26	86.7
II. Livestock Condition	10	10	100
I. Livestock Receiving	25	25	100
III. Handling and Holding	45	45	100
<b>Total</b>	<b>110</b>	<b>106</b>	<b>96.4</b>

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**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

## Summary of Audit Findings

Critical / Major Areas (Questions scoring a 1 or 2):

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**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

1.0	A. Livestock Receiving	Rating
1.	Company provides written expectations for humane handling to transporters. Guidelines must be posted or delivered to transporters. (1 element)	5
2.	Trailer should be cleaned regularly to prevent heavy accumulation of feces. Manure should not surpass hooves. Trailers must have slip resistant floors and no potential injury points (broken glass, sharp metal edges, etc.) (3 elements)	5
3.	Ramps and unloading area should be slip resistant with no accumulated manure or standing water. There are no potential injury points (broken gates, sharp metal edges, etc.) in unloading areas. (3 elements)	5
4.	The plant should discourage use of electric prods during unloading of animals. Less than 5% of animals should be electrically prodded. (1 element)	5
5.	Animals that have become non-ambulatory in transport are handled humanely and per company's established procedures. Auditor verifies that procedures require stunning of animal prior to being physically removing from trailer or transport vehicle. (Reason for this verification is it is very unlikely auditor will be able to visually verify an animal being stunned on a transport vehicle.) (2 elements)	5

**Possible Points**     25

**Actual Points**     25

## Comments

1. Comment only: Guidelines are posted at the receiving.
4. Comment only: Electric prods are not used at unloading for the duration of the audit.
5. Comment only: All animals are humanely stunned prior to moving them from a trailer.

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

2.0	A. Livestock Condition	Rating
1.	Facility has an established procedure for animals that become non-ambulatory after ante-mortem inspection. Procedure includes stunning animal prior to dragging it from pens, chutes, or ramps. (2 elements)	5
2.	Any dead-on-arrivals (DOAs) carcasses should be staged out of public view. The facility must keep track of DOAs. (2 elements)	5

**Possible Points**      **10**

**Actual Points**      **10**

### Comments

1. Comment only: The facility stuns a non-ambulatory animal prior to dragging it. Backup stun gun or rifle .410 is used.

2. Comment only: DOA carcasses are kept out of public view.

**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

3.0	A. Handling and Holding	Rating
1.	All pens should have slip resistant floors and be cleaned or bedded daily. Manure should not surpass the hoof of the animal, and standing water should not be present. Crowd pen, chutes, restrainer, and knock box areas have slip resistant floors. (Verify maintenance records are being maintained.) (5 elements)	5
2.	Pens, chutes, restrainer area, and knock box should be in good repair with no potential injury points (broken gates, sharp metal edges, broken concrete, etc.) present. There are no potential distractions present or observed in the pens, chutes, restrainer, or knock box area. Distractions could include poor design, poor lighting/shadows, out of place objects, voices/noise, debris, etc. Solid sides should be present on crowd pen and chute sides to prevent distractions. (3 elements)	5
3.	There is a preventative maintenance program in place for the stunning equipment. There must be back-up stunning equipment in the stunning area. Stunning equipment must also be available to the receiving area for downers on trailers and in pens. (3 elements)	5
4.	Plant must have an Emergency Livestock Management Plan. The plan should address potential risks and actions for insuring animal welfare, based on geographic location and climate. The plan should be reviewed at least annually. (3 elements)	5
5.	Holding pens must not be overstocked. Animals should have ease of mobility. Crowd pen should be stocked less than 3/4 full. Crowd pen gate should not be used to push animals. (3 elements)	5
6.	All holding pens must have unrestricted access to potable water. Troughs should be regularly cleaned and water cannot be frozen. Animals must have access to feed if held for over 24 hours. (2 elements)	5
7.	The company's training program must reflect procedures and policies for receiving livestock, condition of livestock, holding and handling, and stunning. Retraining should be done at least annually. Records of training must be maintained. (3 Elements)	5
8.	Company performs animal welfare self-audits at least weekly. Records of the self-audits are maintained. Consistent deviations or observations must have corrective actions completed with timelines. The observations of insensibility, stunning accuracy, electric prod usage, vocalization, and slips and falls must be included in the self-audits conducted. (3 elements)	5
9.	<b>ANY WILLFUL ACT OF ABUSE IS GROUNDS FOR AUTOMATIC AUDIT FAILURE. 1) DRAGGING A CONSCIOUS, NON-AMBULATORY ANIMAL; 2) PURPOSEFUL SLAMMING OF GATES ON LIVESTOCK; 3) PURPOSEFUL DRIVING OF LIVESTOCK ON TOP OF ONE ANOTHER; 4) HITTING OR BEATING AN ANIMAL. (1 element)</b>	5

Possible Points 45

Actual Points 45

## Comments

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Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

4.0	A. Observations	Rating
1.	<p><b>SLIPS AND FALLS- UNLOADING: DETERMINE THE NUMBER OF SLIPS AND FALLS DURING UNLOADING AND RECORD PROBABLE CAUSES if any are observed. Count the number of cattle that slip or fall during unloading. In large plants unloading should be continuously observed until 100 animals from three different vehicles are scored. An equal number of animals from each deck should be scored. Vehicles should be scored in the order of arrival at the unloading ramp. In small plants where vehicles are not continuously unloaded, a single vehicle should be scored. If no vehicle arrives, the score sheet is marked unloading not observed. A SLIP IS RECORDED WHEN A PORTION OF THE LEG, OTHER THAN THE FOOT TOUCHES THE GROUND, OR A FOOT LOSES CONTACT WITH THE GROUND IN A NON-WALKING MANNER. A FALL IS RECORDED WHEN AN ANIMAL LOSES AN UPRIGHT POSITION SUDDENLY AND A PART OF THE BODY OTHER THAN THE LIMBS TOUCHES THE GROUND. EXCELLENT = NO SLIPS OR FALLS = 5; ACCEPTABLE = 3% OR LESS SLIPPING OR 1% OR LESS FALLS = 3; NOT ACCEPTABLE = GREATER THAN 1% FALLS OR GREATER THAN 3% SLIPS= 1</b></p>	5
2.	<p><b>SLIPS AND FALLS- STUNNING CHUTE AREAS: DETERMINE THE NUMBER OF SLIPS AND FALLS DURING HANDLING IN ANY OF THE FOLLOWING LOCATIONS: CROWD PEN, SINGLE FILE CHUTE, BARN, ALLEYS OR STUNNING BOX. Score a minimum of 50 animals in large plants. A SLIP IS RECORDED WHEN A KNEE OR HOCK TOUCHES THE FLOOR. IN CATTLE STUN BOXES AND THE SINGLE FILE CHUTE, A SLIP SHOULD BE RECORDED IF THE ANIMAL BECOMES AGITATED DUE TO MULTIPLE SHORT SLIPS. A FALL IS RECORDED IF THE BODY TOUCHES THE FLOOR. EXCELLENT = NO SLIPS OR FALLS = 5; ACCEPTABLE = 3% OR LESS SLIPPING OR 1% OR LESS FALLS = 3 ; NOT ACCEPTABLE = GREATER THAN 1% FALLS OR GREATER THAN 3% SLIPS= 1</b></p>	5
3.	<p><b>USE OF ELECTRIC PRODS FROM CROWD PEN TO RESTRAINER / KNOCK BOX: MONITOR THE PERCENTAGE OF 100 CATTLE PRODDED WITH AN ELECTRIC PROD AT THE RESTRAINER ENTRANCE. Facilities with two or more single file chutes should be audited, so there is an even distribution of animals observed among all of the single file chutes. If multiple employees are using prods, score 100 animals passing by each employee. Add the percentages together to determine the final score. Note whether or not a prod was used for each animal and the apparent reason for prod use in the comments. ELECTRIC PRODS SHOULD ONLY BE USED WHEN NECESSARY. ELECTRIC PRODS AND ANY OTHER OBJECTS SHALL NOT BE USED ON SENSITIVE AREAS (FACE, ANUS AND GENITAL). ELECTRIC PRODS SHOULD NOT BE USED IN HOLDING AREA OR CROWD PEN. EXCELLENT = 5% OR LESS PRODDED = 5; ACCEPTABLE = 25% OR LESS PRODDED = 3; NOT ACCEPTABLE = GREATER THAN 25% PRODDED = 1</b></p>	5
4.	<p><b>VOCALIZATION: MONITOR THE NUMBER OF CATTLE THAT VOCALIZE (PROVOKED BY STRESS OR AGITATION) IN THE CROWD PEN, LEAD-UP CHUTE STUNNING BOX OR RESTRAINER. SCORE A MINIMUM OF 100 ANIMALS IN LARGE PLANTS AND 50 OR AT LEAST ONE HOUR OF PRODUCTION IN SMALLER PLANTS. VOCALIZING ANIMALS IN THE CROWD PEN AND LEAD-UP CHUTE ARE SCORED DURING ACTIVE HANDLING. SCORE AN ANIMAL AS A VOCALIZER, IF IT MAKES ANY AUDIBLE VOCALIZATION. Determine cause for animals that are vocalizing and include in comments. AMI GUIDELINES DEFINE ACCEPTABLE VOCALIZATION AS UP TO 3% FOR CONVENTIONAL SLAUGHTER AND UP TO 5% IN KOSHER OR HALAL OPERATIONS OR ANY OPERATION USING A HEAD HOLDER. EXCELLENT = LESS THAN 1% VOCALIZATION = 5; ACCEPTABLE = 3% or less (conventional) or 5% or less (ritual or with use of head holder) VOCALIZATION = 3; NOT ACCEPTABLE = GREATER THAN 3% (CONVENTIONAL) OR 5% VOCALIZATION (RITUAL OF WITH USE OF A HEAD HOLDER = 1</b></p>	3

**Possible Points**

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.



## A. Observations

5.	<b>STUNNING ACCURACY (CONVENTIONAL ONLY): PLANNED DOUBLE KNOCKING IS PROHIBITED. IF A NON-PENETRATING CAPTIVE BOLT IS USED, THE ANIMALS SHOULD BE BLED PROMPTLY BUT NO LONGER THAN 60 SECONDS AFTER STUNNING TO AVOID RETURN TO SENSIBILITY. THE FIRST SHOT MUST RENDER THE ANIMAL INSENSIBLE. SCORE 100 CATTLE IN PLANTS WITH LINE SPEEDS GREATER THAN 100 CATTLE PER HOUR. FIFTY CATTLE OR AT LEAST ONE HOUR OF PRODUCTION SHOULD BE AUDITED IN SLOWER PLANTS PROCESSING FEWER THAN 100 HEAD PER HOUR. RECORD PERCENTAGE OF ANIMALS THAT WERE STUNNED TWICE AND PROBABLE CAUSES AND INCLUDE IN COMMENTS. Auditor is to list stunning method used in comments. EXCELLENT = 99-100% INSTANTLY RENDERED INSENSIBLE WITH 1 SHOT = 5; ACCEPTABLE = 95-98% INSTANTLY RENDERED INSENSIBLE WITH 1 SHOT = 3; NOT ACCEPTABLE = LESS THAN 95% INSTANTLY RENDERED INSENSIBLE WITH 1 SHOT = 1</b>	3
6.	<b>BLEED RAIL INSENSIBILITY SURVEY: ANY SENSIBLE ANIMAL ON THE BLEED RAIL CONSTITUTES AN AUTOMATIC AUDIT FAILURE. SCORE A MINIMUM OF 100 ANIMALS IN LARGE PLANTS. FIFTY CATTLE OR AT LEAST ONE HOUR OF PRODUCTION SHOULD BE AUDITED IN SLOWER PLANTS PROCESSING FEWER THAN 100 HEADS PER HOUR. IT IS CRITICAL THAT ANIMALS SHOWING SIGNS OF A RETURN TO SENSIBILITY BE RESTUNNED IMMEDIATELY. THERE IS ZERO TOLERANCE FOR BEGINNING ANY PROCEDURES LIKE SKINNING THE HEAD OR LEG REMOVAL ON ANY ANIMAL THAT SHOWS SIGNS OF A RETURN TO SENSIBILITY; however, it is important to complete the audit and note observations about insensibility. Insensibility is characterized by a floppy head, straight tongue hanging out, no righting reflex, eyes are in a blank stare (no eye tracking), no natural blinks occurring. EXCELLENT =100% INSENSIBLE = 5; NOT ACCEPTABLE = LESS THAN 100% INSENSIBLE = 1</b>	5

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30

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26

## Comments

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1. Comment only: There are no slips and falls observed during unloading of a single trailer. 41 animals were unloaded from that trailer.
2. Comment only: There were no slips or falls observed in the stunning area. 34 animals were observed (one hour of operation).
3. Comment only: Electric prods are not used during the audit. Electric prods are available if needed.
4. One animal was vocalizing out of 34 animals observed during the audit (one hour of operation).
5. One animal was double stunned by using rifle (.410). 34 animals were observed (one hour of operation).
6. Comment only: There was no sensible animal observed on the bleed rail. Please note: Bleeding time is very short due to bleed chain layout (configuration). It is imperative that no dressing procedure starts until animal is completely bled. 34 animals were observed (one hour of operation).

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Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

# Animal Welfare Cover Sheet for Beef AW and SRM Audits

*for:*  
**Walt's Wholesale Meats, Inc: Woodland, WA**

**Report Date**  
**May 27, 2010**

**Audit by**  
**Dragoslav Pavlovic**

**Silliker, Inc.**

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<b>Company Name: Parent Company:</b>	<b>Walt's Wholesale Meats, Inc: Woodland, WA</b>	<b>Audit Date:</b>	<b>May 27, 2010</b>
		<b>Start &amp; End Time:</b>	<b>12:00 AM - 2:00 PM</b>
<b>Plant Address:</b>	<b>350 Pekin Road Woodland, Washington 98674</b>	<b>Silliker Auditor:</b>	<b>Dragoslav Pavlovic dragoslav.pavlovic@silliker.com 708-704-3516</b>
<b>USDA est #:</b>	<b>6423</b>	<b>Primary Contact:</b>	<b>Jason Houser</b>
<b>Telephone:</b>	<b>360-225-7433</b>	<b>Email:</b>	<b>waltsmeatsinc@comcast.net</b>
<b>Fax:</b>	<b>360-225-6196</b>	<b>Line Speed:</b>	<b>34</b>
<b>Pass/Fail:</b>	<b>Pass</b>		
<b>Follow-up audit required (Auditor to enter yes/no/T)</b>	<b>None</b>	<b>Follow-up audit required (Auditor to ente</b>	<b>No</b>

### Audit Summary

	<b>Percentage</b>	<b>Possible Points</b>	<b>Actual Points</b>
<b>Total</b>	98	200	196

### Beef AW Audit Summary\*


<b>Category</b>	<b>Possible Points</b>	<b>Actual Points</b>
<b>I. Livestock Receiving</b>	25	25
<b>II. Livestock Condition</b>	10	10
<b>III. Handling and Holding</b>	45	45
<b>IIII. Observations</b>	30	26
<b>Total</b>	110	106

### SRM Addendum Summary\*

<b>Category</b>	<b>Possible Points</b>	<b>Actual Points</b>
<b>I. Specified Risk Material Assessment</b>	90	90

\* Reference individual audit report for details

**Auditor Signature:**



Dragoslav Pavlovic 708-704-3516; dragoslav.pavlovic@silliker.com



# Fresh Beef E. coli O157:H7 Addendum

*for:*

**Walt's Wholesale Meats, Inc:  
Woodland, WA**

**Report Date  
May 27, 2010**

**Audit by  
Dragoslav Pavlovic**

**Silliker, Inc.**

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# I. Interventions for Pathogen Reduction

Interventions for Pathogen Reduction	Rating
1. E. coli O157:H7 is a hazard likely to occur in the facility's HACCP plan.	Yes
2. Facility uses one or more recognized microbiological intervention technologies in its process. Acceptable technologies include steam pasteurization, hot water pasteurization, organic acid rinses, steam vacuums, or antimicrobial treatments.	Yes
3. List all microbiological interventions and pathogen reduction processing aids. Include both slaughter and fabrication related interventions that are applied. Additionally, facility must have at least one of the interventions designated as a Critical Control Point (CCP) in its HACCP plan to address E. coli O157:H7. Document what the facility is monitoring (ex. concentration, temperature, dwell time) for each intervention and identify which interventions are CCPs.	Yes
4. Any microbiological intervention technology designated as a CCP has been validated against E. coli O157:H7. Validation studies (may be a 3rd party challenge study, journal paper, in-house study, etc.) are on file. List validation materials and date of validation. [Note - If not thermal (steam or hot water), intervention must be validated and demonstrated as equal or better to thermal systems for microbial-pathogen reduction. Validation materials must be provided to support equivalency or reduction capabilities.]	Yes
5. List all ongoing verification programs for microbiological interventions and pathogen reduction processing aids. (Auditor to list in Comments in section below)	
6. Does facility have a direct product treatment intervention on trim prior to N60 sampling?	Yes

**Possible Points**      **0**

**Actual Points**      **0**

**Percentage**

## Comments

- |   |  |
|---|--|
| 2 | Comment only: The facility uses hide cold water wash, previous steam vacuum, post evis steam vacuum, trimming, cold water wash, sanova cabinet prior to chill, Sanova post chill and Sanova in combos.                 |
| 3 | Comment only: Pre chill sanova on the kill floor is the CCP. Concentration dwell time and pH are monitored in the Sanova cabinet.  |
| 4 | Comment only: The facility validates effectiveness of sanova cabinet as a CCP and hand application of Sanova on carcasses parts and trims. Validation is conducted on March 18, 2010 (Sanova cabinet and combo spray). |
| 5 | N/A: Facility test pre intervention and post intervention carcasses on an weekly basis to validate the effectiveness of Sanova.  |
| 6 | Comment only: Facility applies Sanova on all carcass surfaces prior to breaking carcasses in fabrication and parts and trim.   |

## II. Sampling Programs for Components Destined for Raw Ground

### Sampling Programs for Components Destined for Raw Ground

Rating

1. A minimum of N=60 testing per lot for E. coli O157:H7 is performed on all beef trim and other raw beef components [i.e., head meat, hearts, etc.] produced in the plant that are 'intended for raw ground use'. Sampling programs must be written and supported with validation data and documentation. Related documents shall be available for review upon request.	Yes
1.1. Facility produces combo trim? Written sampling program in place for combo trim?	Yes
1.2. Facility produces box trim? Written sampling program in place for box trim?	Yes
1.3. Facility produces FTB, BLBT, LTB, AMR? Written sampling program in place for FTB, BLBT, LTB, AMR?	
1.4. Facility produces other raw beef components (head meat, cheek meat, hearts, tongue root, etc)? Written sampling program in place for other raw beef components?	
2. Sampling program is demonstrated and validated as robust and rigorous and is equivalent or better to the N=60 'best practice' program for 95% or better statistical confidence. If not N=60, describe sampling process and list N value in Comments.	Yes
3. Sampling program specifics [Note- Auditor should distinguish differences, where applicable, in sampling programs. For example, combo trim programs may differ from FTB programs]:	
3.1. How are the samples collected? [For example, traditional excision, modified excision or mechanical. NOTE- Traditional excision is defined as the USDA sampling method.] (Auditor to list in Comments in section below).	
3.2. If procedure is modified from traditional excision, is there validation documentation?	
3.3. Does the facility verify sample counts? List the frequency in Comments (ex. X times by plant per week, X times by lab per week).	Yes
3.4. Does the facility check sample weights? Describe the process and list the frequency in Comments. List sample weight minimum, maximum, and target.	Yes
3.5. Does sampling program target, where possible, surface tissue over internal tissue?	Yes
3.6. Does sampling program require each excision sub-sample to be collected from distinctly different trim pieces? Does the sampling program account for exceptions for extremely large pieces of product where it may not be possible to sample individual pieces (2 piece-chucks, goosenecks)? Describe exception.	Yes
3.7. Is there a program in place to address the handling of lotting for slow fill versus fast fill combos?	No
3.8. Auditor should observe sample collection and report accuracy against specified method. (Auditor to list in Comments in section below).	
4. Employees performing sampling programs are trained to complete sampling tasks? Is training documented?	Yes
5. Lotting methods and lot sizes are defined and designed to cover all 'intended for raw ground' meat components produced in plant. Lotting programs must be supported with documentation. List lot size(s) for the following [lot size may be in pounds, combos, pallets, boxes, etc., list most accurate description]: (a)Combo trim (b)Box trim (c)FTB, BLBT, LTB (d)Other raw beef components	Yes



## II. Sampling Programs for Components Destined for Raw Ground

<b>Possible Points</b>	<b>0</b>
<b>Actual Points</b>	<b>0</b>
<b>Percentage</b>	

### Comments

- 1** Comment only: Facility N=60 program targets all beef trim or other products destined for raw ground beef. Facility routine sampling of beef manufacturing trimmings intended for use in raw ground beef for ECH7 programs were supported by FSIS Notice 18-07 and the BIFSCO N=60 protocol DVD.
- 1.1** Comment only: The facility uses N=60 incision sapling method for combo trim.
- 1.2** Comment only: The facility uses N=60 incision sapling method for box trim.
- 1.3** Comment only: The facility do not produce FTB, BLBT, LTB or AMR.
- 1.4** N/A: The facility does NOT test variety mets.
- 2** Comment only: Facility utilizes traditional excision sampling to collect samples for EC 0157:H7 analysis. Facility routine excision sampling of beef manufacturing trimmings intended for use in raw ground beef for ECH7 programs were supported by FSIS Notice 18-07 and the BIFSCO N=60 protocol DVD.
- 3** Comment only: All beef intended for grinding is sampled by using N=60 method.
- 3.1** Comment only: Samples are collected by traditional excision.
- 3.2** N/A: Samples are collected by traditional excision.
- 3.3** Comment only: The facility verifies sample count once per day (60 +/- 2).
- 3.4** Comment only: The facility verifies weight daily (375 gr +/- 5 gr).
- 3.5** Comment only: Sampling program target, where possible, surface tissue over internal tissue.
- 3.6** Comment only: Sampling program requires each excision sub-sample to be collected from distinctly different trim pieces.
- 3.7** There is no program that addresses fast vs. slow combos. Please note: Combos are filled in about hour (slow fill).
- 5** Comment only: Maximum of five pallets of combo trim and five pallets of boxed trim (thirty boxes per pallet) are defined as a lot.

### III. Verification Testing / Check Sample Program

#### Verification Testing / Check Sample Program

Rating

1. As an ongoing verification/check of the sampling and testing procedures in the plant, the facility conducts quarterly verification/check samples of N=60 tested trimmings by subjecting a negative tested 'lot' to grinding and subsequent finished product testing. [NOTE - If the facility wishes to take the verification sample prior to the receipt of the initial ECH7 lab results, this is permissible to save time. However, the facility must confirm that the initial N=60 sample is negative, and if the results are not negative, a new verification sample must be taken. Further, the verification sample is required to be taken from finished (ground) product. If there are variances from this in the facility's protocol, customers must be notified.]	Yes
2. Verification/check sampling and testing are increased to a monthly frequency for 2nd and 3rd quarters (April - September). Auditor is to list the dates of the last 3 quarters verification/check samples in the comments section.	Yes
3. N60 verification/check samples shall be observed by an independent 3rd party auditor minimally 1x/year, and lab testing shall be conducted at a 3rd party lab minimally 1x/year. [NOTE- At least one of the 3rd party observations shall occur between April-September of the calendar year. Results are to be reported directly to customer (as requested). Additionally, if the facility utilizes a 3rd party lab, the observation sample does not need to go to a different lab.] (Auditor to list in Comments in section below).	Yes
3.1. Is aseptic technique being followed?	Yes
3.2. Where possible, is surface tissue being targeted over internal tissue?	Yes
3.3. Are the excision sub-samples being collected from distinctly different pieces?	Yes
3.4. What is the piece count of the final sample? (Auditor to list in Comments in section below).	
3.5. What is the weight of the final sample? (Auditor to list in Comments in section below).	

**Possible Points** 0

**Actual Points** 0

**Percentage** \_\_\_\_\_

#### Comments

- |     |  |
|-----|--|
| 1   | Comment only: The facility samples already sampled lot (simultaneously) once per month; twelve months a year. N=60 is used, sample is ground.                            |
| 2   | Comment only: The facility performs monthly verification testing throughout the year. January 18, 2010; February 2, 2010; March 2, 2010; April 12, 2010 and May 4, 2010. |
| 3   | Comment only: Verification sample was sent to the same third laboratory (Exova Lab). in Portland, OR. The sample was ground prior to shipping.                           |
| 3.4 | Comment only: Sixty pieces were collected regular sample and check (verification) sample.  |
| 3.5 | Comment only: Both samples (regular and verification were 378 grams.   |

## IV. Testing Laboratory

Testing Laboratory	Rating
1. The laboratory must be operated under a Quality System that supports the chosen ECH7 method, which, at a minimum includes validation of employee training, sample traceability, timely transmission of COA's, and recordkeeping. Evidence of compliance is either accreditation or auditing by an independent 3rd party. A Quality System that meets ISO 17025 is acceptable. Validation documents shall be provided upon request. (a)List Lab Name & Location (b)List Accreditation and/or 3rd Party Auditor & date.	Yes
2. If the testing for E. coli O157:H7 is on-site, the laboratory is physically isolated from production areas. Controls to prevent pathogen contamination are in place. There is a program for running positive controls/cultures with documented records for all analyses.	
3. Internal/External laboratory participates in a proficiency testing program to assure accuracy of its results. Records are available for review. List proficiency program.	Yes

**Possible Points**      **0**

**Actual Points**      **0**

**Percentage**

### Comments

- 1      Comment only: The facility uses Exova Inc., in Portland Oregon. The laboratory is A2LA accredited (expiration date is January 31, 2011). Accredited method used is AOAC RI 070201.
- 2      N/A: The facility use an outside third party company laboratory.
- 3      Comment only: The facility uses Exova Inc., in Portland Oregon. The laboratory is A2LA accredited (expiration date is January 31, 2011). Accredited method used is AOAC RI 070201.

## V. Lab Methods

Lab Methods	Rating
1. All sampled slices from a 'lot' shall be enriched and tested. Sampled pieces shall be enriched as intact slices [massaged], and not ground in the enrichment sample. (a)If "wet" compositing is being used, list what an enrichment represents (EXAMPLES: N=15 per combo for 5 combos; N=60 per combo; 9 minute ground beef sample). (b)If "wet" compositing is being used, list the number of enrichments that make up the "wet" composite (EXAMPLE: If N=60 per combo completed on 5 different combos, each N=60 is enriched, each of the enrichments are used to make up one "wet" composite, then the answer would be 5).	Yes
2. Rapid screen method is either (a) PCR DNA amplification, or (b) ELISA-based tests, which is capable of detecting known pathogenic strains of E. coli O157:H7 [including Cluster A strains]. For the following, please note if methodologies differ based on product types (ex. trim testing has different enrich time versus ground product): (a)Document all methods being used by facility. (b)Document incubation time, temperature and dilution factor. (c)If method includes "wet" compositing, is the method validated?	Yes
3. Product disposition: (a)Presumptive positives are deemed positive if not culturally confirmed. (b)Product disposition is determined on presumptive positives. (If "wet" compositing is being used, describe how product disposition is determined on a presumptive positive.) (c)Confirmation capability of the lab is validated. (d)Facility has an Event Day (or Multiple Positive Day) program outlining procedures and corrective actions in the event that multiple presumptive positives are detected in one production day.	Yes

**Possible Points**      **0**

**Actual Points**      **0**

**Percentage**

### Comments

- 1      Comment only: External laboratory (Exova) utilizes Elisa based test methods to detect EC 0157:H7. Testing incubation temperature at 37 +/- 1 degree C, Incubation Period = 20 hours, Media = Modified EC Broth with Novobiocin (ECN). Dilution factor is 1:10. Facility methods are validated to achieve a minimum of 4-log amplification in the defined time / temperature period applied. Facility maintained numerous documents to display laboratory methods have been validated.
- 2      Comment only: The facility uses ELISA based test , which is capable of detecting known pathogenic strains of E. coli O157:H7 (including Cluster A strains). Every bag of samples represents a lot.
- 3      Comment only: Facility has written protocols on how to handle presumptive positive results, but does not have any written program on how to handle Multiple Positive days (event days) at this time.

## VI. Certificate of Analysis

### Certificate of Analysis

**Rating**

1. [Note - Auditor shall review a Certificate of Analysis to confirm the presence, or record the absence, of the items listed below. This document may also be identified under a different name, Certificate of Conformance, Analytical Results, Laboratory Report, Testing Declaration, etc.]	
2. Product produced as 'intended for raw ground use' is accompanied with a Certificate of Analysis [COA] showing a negative result for each tested 'lot', at or before time of receiving. COA identifies the 'lots' covered by the test results, and is applicable to all product received in a shipment or order.	Yes
3. All laboratory results are subject to a minimum of a dual review and approval process.	Yes
4. Each Certificate of Analysis has its own unique number or identifier. *COA's that are revised indicate a revision date, revision reason and are traceable to the original COA.	Yes
5. The document clearly identifies that it is a Certificate of Analysis. List identifier.	Yes
6. The type of test and testing method used are listed on the Certificate of Analysis.	Yes

**Possible Points**      **0**

**Actual Points**      **0**

**Percentage**

### Comments

- |   |  |
|---|--|
| 1 | Comment Only: Facility does not receive any beef trim for grinding at this facility. Facility ships tested beef trim products to further processors for grinding with COA's. |
| 2 | Comment only: The facility issues certificate of analysis based on laboratory results. All results are identified by a PO number.  |
| 3 | There are two signatures on Certificate of Analysis.   |
| 4 | Comment only: Lab report PO number is used as identifier.  |
| 5 | Comment only: The document clearly identifies that it is a Certificate of Analysis.  |
| 6 | Comment only: The test method is listed as N 60 robust technology ELISA.   |

**AUDIT REPORT**

# Good Manufacturing Practices and Food Safety Systems Audit

*for:*

**Walt's Wholesale Meats, Inc:  
Woodland, WA**

**Report Date  
May 27, 2010**

**Audit by  
Dragoslav Pavlovic**

**Silliker, Inc.**

This audit report sets forth Silliker, Inc. ("Silliker") findings and recommendations as of the date herein. Silliker shall not assume any responsibility for the programs and/or facility being audited nor for events or actions occurring prior or subsequent to this audit. Silliker shall not endorse, and hereby expressly disclaims, any liability related to the client carrying out Silliker's recommendations, if any, contained in this report.

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## Audit Summary

<b>Company Name: Parent Company:</b>	Walt's Wholesale Meats, Inc: Woodland, WA	<b>Audit Date: Start/End Time (# hrs on records/observations):</b>	May 25 -27, 2010 8:00 - 4:30 PM; 8:00 AM - 4:00 PM; 8:00 AM - 1:00 PM
<b>Plant Address:</b>	350 Pekin Road Woodland, Washington 98674	<b>Plant phone &amp; Fax Numbers:</b>	360-225-8203 360-225-6196
		<b>Email:</b>	waltsmeatsinc@comcast.net
<b>Silliker Auditor:</b>	Dragoslav Pavlovic dragoslav.pavlovic@silliker.com 708-704-3516	<b>Company Associate(s) accompanying auditor (Name &amp; title):</b>	Jason Houser, Program Manager
<b>Products produced by plant:</b>	Beef	<b>Facility meets Bio-terrorism registration requirement:</b>	N/A USDA establishment number 6423

<b>Audit score:</b>	95.2	<b>Rating:</b>	Good
<b>Last Audit Date:</b>	May 27 - 29, 2009	<b>Last Audit Score:</b>	96.5
<b>Follow-up audit required:</b>	No	<b>Reason for follow-up:</b>	N/A
<b>Pass/Fail:</b>	Pass		

## Audit Review

<b>Company associate(s) with whom audit findings were reviewed:</b>	Jason Houser, Program Manager
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### Auditor Signature:

Dragoslav Pavlovic 708-704-3516; dragoslav.pavlovic@silliker.com

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## Plant Description

The facility is a USDA facility and does not need to register with FDA.

Walt's Wholesale Meats is a privately owned company. This facility slaughter was built in 2005 and boning room in 2004. The facility is one story and approximately 28,000 square feet.

The layout of the facility is made up of animal receiving, slaughter, coolers, boning room, dry storage, administrative offices, employee areas, and shipping areas. The facility is in good condition, clean, and well kept.

Walt's Wholesale Meats employs 100 people working one shift, six days per week. The second shift being complete teardown by Sanitation.

Walt's Wholesale Meats produces beef primals, subprimals, trim, and offal products.



# Summary of Audit Findings

**Company:** Walt's Wholesale Meats, Inc:  
Woodland, WA

**Audit Date:** May 27, 2010

## Critical / Major Areas (Questions scoring a 1 or 2):

### I. Food Safety Systems

- I.B.3** \* Several employees did not wash hands after using bathroom. In addition, an employee was blowing their nose on the fab floor and did not wash hands prior to returning to work. The employee did put gloves on prior to beginning to work again.
- I.C.2** \* There is potential for product contamination due to excessive condensation over exposed carcasses in the hot box. Condensation was also observed on ceiling on fab floor. Loose caulking was observed over skimmers on the fab floor.
- I.F.3** \* It appears that washing hands did not improve since last year.

### II. Quality Systems

- II.E.7** \* The facility does not trace packaging materials to finished product.

### III. Grounds, Building, & Equipment

- III.B.2** \* Damaged floor was observed at several areas of the facility i.e. (fab floor).

### VI. Receiving, Storage, & Shipping

- VI.B.9** \* Heavy condensation was observed in the hot box. No direct product contamination was observed. Temperature in the hot box is 35 degrees F., box cooler was 32 degrees F.

## Positive Comments

The management team was very courteous during all audit activities and receptive to addressing all audit findings upon notification.

# Good Manufacturing Practices and Food Safety Systems Audit Rating Analysis

**Company:** Walt's Wholesale Meats, Inc:  
Woodland, WA

**Audit Date:** May 27, 2010

<b>Category</b>	<b># Points Received</b>	<b># Possible Points</b>	<b>Percentage (%)</b>
<i>I. Food Safety Systems .....</i>	102	110	92.7
<i>II. Quality Systems .....</i>	180	185	97.3
<i>III. Grounds, Building, &amp; Equipment .....</i>	92	100	92
<i>IV. Pest Control .....</i>	40	40	100
<i>V. Employee Practices .....</i>	28	30	93.3
<i>VI. Receiving, Storage, &amp; Shipping .....</i>	59	65	90.8
<i>VII. Plant Sanitation .....</i>	43	45	95.6
<i>VIII. Processing .....</i>	45	45	100
<i>IX. Food Defense .....</i>	49	50	98
<b>Overall Score .....</b>	<b>638</b>	<b>670</b>	<b>95.2</b>

**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

# I. Food Safety Systems

## A. HACCP

### Rating

1. A HACCP team, comprised of members from across the plant, has been established and meets on a routine basis. The team includes a person trained in a formal, external HACCP course. (2 Elements)	5
2. Each product must be fully described in the HACCP plan. The descriptions must include raw materials and ingredients, finished products, how the products are to be distributed, intended use of the product and intended consumers. (2 Elements)	5
3. A flow chart must exist for each product and for all variations of the process and sub process. The flow charts must be verified as being accurate, dated and signed. (2 Elements)	5
4. The flow chart must identify and describe each step in the process, including all inputs and outputs and all interactions between process steps. The flow chart must include rework and recycled pathways, intermediate processes, hand operations, and outsourced or subcontracted work. (1 Element)	5
5. A written hazard analysis must be available and identify the significant food safety hazards associated with the products and ingredients covered by the HACCP plan and reasonably likely to occur. The hazard analysis must be based on scientific and/or technical data and include the specific hazard relevant to the products and processes. (2 Elements)	5
6. The critical control points are identified on the process flow chart as well as in the documented HACCP plan. (2 Elements)	5
7. Critical limits have been scientifically established, validated and documented. (2 Elements)	5
8. Critical Control Points are monitored at regularly scheduled intervals that ensure control of the process.. Monitoring procedures are documented and monitoring records are maintained. The person monitoring the Critical Control Point understands the procedures. (3 Elements)	5
9. Employees who are involved in the HACCP plan have been trained in the HACCP-related activities in their immediate work areas. This training is documented as to date(s) given and is a part of the employee's records. The training should be conducted annually. (2 Elements)	5
10. Corrective action procedures have been identified, and corrective action records are maintained. Product disposition is documented. (3 Elements)	5
<b>11. CORRECTIVE ACTION PROCEDURES ARE TAKEN WHEN CRITICAL LIMITS ARE NOT MET. (1 Element)</b>	5
12. Appropriate verification procedures have been identified and are documented, including the frequency for each verification step. Calibration tasks are documented and records of the calibration are maintained. All verification activities are documented. (3 Elements)	5
13. All records related to performing HACCP tasks and reviewing HACCP records are appropriately signed/initialed and dated. (2 Elements)	5
14. The HACCP plans must be verified through an annual reassessment. The reassessment team can be internal or external to the operation. This verification is independent of other routine verification procedures and must be documented by a report that is maintained in the HACCP plan's historical records. The reassessment must be performed to ensure the HACCP plan results in the control of the hazards. (3 Elements)	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

# I. Food Safety Systems

## B. Food Safety Practices

**Rating**

1. Proper employee and equipment traffic flows are used to minimize contamination between raw products and finished products. Food processing areas are organized to minimize the risk of cross-contamination through adequate separation of raw materials, finished product, and storage and distribution areas. (2 Elements)	5
<b>2. EMPLOYEES WITH OBVIOUS SORES, INFECTED WOUNDS, OR OTHER INFECTIOUS ILLNESSES SHALL NOT BE ALLOWED TO HAVE DIRECT CONTACT WITH EXPOSED FOOD PRODUCTS OR PRODUCTION / STORAGE AREAS. (1 Element)</b>	5
3. Employees are observed washing their hands after activities that may have contaminated them. Activities can include, but are not limited to: using the restrooms; after breaks; prior to entering production and product packaging areas; prior to handling product; prior to touching product contact and non-food contact surfaces or after handling garbage. When disposable gloves are being used they must be changed when they are damaged, after any absence from the workstation, or when potential contaminants are handled. Procedures for the proper handling and usage of gloves are established and implemented. Gloves must be worn when there is direct hand contact with ready-to-eat products. Non-disposable rubber gloves must be washed and sanitized frequently, after breaks, and/or after handling potential contaminants. (3 Elements)	1
4. Only approved food-grade lubricants are used in product contact zones and they are appropriately stored and labeled. (2 Elements)	5

## C. Product Contamination

**Rating**

<b>1. NO ACTUAL PRODUCT CONTAMINATION IS OBSERVED. (1 Element)</b>	5
2. No condition or practice exists that may potentially contaminate product, or could lead to product contamination. (1 Element)	1
3. A written glass control and brittle plastic program has been established. The program addresses all glass that is to be shielded within the facility, handling of glass and brittle plastic packaging, and clean-up procedures for glass and brittle plastic breakage. (3 Elements)	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

# I. Food Safety Systems

## D. Allergen/Adverse Reaction Management

Rating

<b>1. THE FACILITY USES INGREDIENTS THAT ARE FOOD ALLERGENS AND HAS DEVELOPED AN ALLERGEN CONTROL PROGRAM TO PREVENT CROSS-CONTACT WITH ALLERGENS. (1 ELEMENT)</b>	N/A
2. A master listing of ingredients used in the plant that are food allergens has been developed and is documented. Ingredients that are allergens are identified as allergens on all formulation, batch, or raw material production records. Allergens are properly labeled when not in original container. (3 Elements)	N/A
3. The allergen program includes documented procedures for control of allergens in the following areas: allergen separation in storage, clean up procedures for allergenic ingredient spills, controls of utensils and storage containers that come into contact with allergens. (2 Elements)	N/A
4. Production scheduling is done to ensure allergens are run prior to changeover and that specific changeover procedures are developed for allergen removal. Verification of changeover activity is conducted. Records of changeover and verification activities are maintained. (3 Elements)	N/A
5. Facility has a written label reconciliation program in place. It includes regular review of product labels versus product being packaged, inspection of labels at receipt to ensure accuracy, and removal and destruction of obsolete labels. Records of allergenic containing label inspection at receipt and review of label vs. product are maintained. (3 Elements)	N/A
6. Facility has a written procedure on handling the rework of allergens. It includes proper labeling of rework to identify the product and allergen present and control of rework back into process and/or product. (2 Elements)	N/A
7. Facility complies with US FDA Food Allergen Labeling and Protection Act of 2004 (effective January 2006), which identifies allergens on product labels using common terms. (This is only applicable to facilities governed by FDA regulations). (1 Element)	N/A
8. Facility is using testing to verify effectiveness of allergen removal in changeover procedures. Auditor will list the method being used in comment section. (1 Element)	N/A

## E. Food Safety Training

Rating

1. A program for conducting food safety, food defense, GMP, and allergen training for all employees, including new employees, has been established. Completion of this training is documented as to date(s) given, what topics were covered, and who conducted the training and is a part of the employee's records. The training should be conducted annually. Provisions for temporary employees are included in the training program. (4 Elements)	5
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## F. Miscellaneous

Rating

<b>1. FACILITY HAS COMPLETED THE REQUIRED REGISTRATION FOR THE BIO-TERRORISM REGULATION. THE AUDITOR CAN VERIFY THAT THE FACILITY HAS GONE THROUGH THE REGISTRATION PROCESS. (IF THE FACILITY IS NOT REGISTERED THIS IS AN AUTO-FAILURE.) Not required if facility is under USDA FSIS inspection.</b>	N/A
2. If FDA regulated and located in the USA, the facility is aware of the 2009 FDA regulation establishing a Reportable Food Registry (RFR) and its accountability as a food or feed manufacturer to report when there is reasonable probability that an article of food will cause serious adverse health consequences. (2 Elements)	N/A
3. Facility has completed corrective actions from previous third party audits for designated audit defects. Auditor will randomly select 3 corrective actions listed from previous audits and verify that designated audit defects were not observed as being out of compliance in this audit.	No

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

# I. Food Safety Systems

<b>Possible Points</b>	<b>110</b>
<b>Actual Points</b>	<b>102</b>
<b>Percentage</b>	<b>92.7</b>

## Comments

- I.A.2** Comment only: The facility has two HACCP plans: Slaughter and raw not ground.
- I.A.3** Comment only: There are two CCPs for slaughter plan (zero carcasses and Sanova) and one CCP for raw not ground (product temperature after loading combos).
- I.A.7** Comment only: The facility validates effectiveness of Sanova cabinet as a CCP and hand application of Sanova on carcasses parts and trims. Validation is conducted on March 18, 2010 (Sanova cabinet and combo spray).
- I.A.8** Comment only: Records for slaughter plan CCP-1 (zero tolerance) and CCP-2 (Sanova concentration) were reviewed (January 29 thru April 28, 2010).
- I.A.11** Comment only: Corrective action was initiated on April 27, 2010 for failure of CCP-1 (zero tolerance).
- I.A.13** Comment only: Records for slaughter plan CCP-1 (zero tolerance) and CCP-2 (Sanova concentration) were reviewed (January 29 thru April 28, 2010).
- I.A.14** Comment only: HACCP plan reassessments were done basically every month (most recent on May 14, 2010) but document addressing yearly reassessment is also available for review (January 14, 2010).
- I.B.1** Comment only: This is a beef slaughter facility, traffic is restricted from one area to another.
- I.B.3** Several employees did not wash hands after using bathroom. In addition, an employee was blowing their nose on the fab floor and did not wash hands prior to returning to work. The employee did put gloves on prior to beginning to work again.
- I.C.2** There is potential for product contamination due to excessive condensation over exposed carcasses in the hot box. Condensation was also observed on ceiling on fab floor. Loose caulking was observed over skinners on the fab floor.
- I.D.1** N/A: The facility does not use allergens.
- I.D.2** N/A: The facility does not use allergens.
- I.D.3** N/A: The facility does not use allergens.
- I.D.4** N/A: The facility does not use allergens.
- I.D.5** N/A: The facility does not use allergens.
- I.D.6** N/A: The facility does not use allergens.
- I.D.7** N/A: The facility does not use allergens.
- I.D.8** N/A: The facility does not use allergens.
- I.F.1** N/A: This is a USDA facility 6423.
- I.F.2** N/A: This is a USDA facility.
- I.F.3** It appears that washing hands did not improve since last year.

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## II. Quality Systems

### A. QA/QC Program

Rating

1. A written quality management program, which identifies and defines the policies and procedures for the operation and control of the site's food safety and quality programs, is established, organized, and current. There is an approval process for the program and its procedures, including changes. The program identifies an individual whose job description includes responsibility for managing the overall program. (4 Elements)	5
2. There are written standards and specifications for raw and finished food products and packaging materials that come in contact with food. How any rework is used in products must be defined. (4 Elements)	5
3. Procedures and criteria have been established for all hold and release programs. Documentation and records are maintained. The procedures shall include a method of identification for held products, a log of holds with descriptions of the holds and reconciliation of open holds. (3 Elements)	5
4. There is a written record retention program for all quality and food safety records, including electronic documents. The program describes what records are included, how long they are maintained and where the records will be kept. There are secure back-up procedures for electronically retained records. (3 Elements)	5
5. Self-audits are performed at least monthly. Copies are maintained for at least 12 months. Self-audits must include physical inspections of all areas and equipment of the facility and grounds, evaluating maintenance, sanitation, food security, and GMP compliance. Personnel from all departments participate. Corrective actions include what is to be done, when, and by whom. (4 Elements)	5
6. There is a defined program to review existing product labels and the development of new product labels for information accuracy and regulatory compliance. The program identifies the frequency of review, responsible function for completing it, and the approval process for new label development and label changes. The auditor will verify compliance to the process by reviewing a minimum of one label against specification and include the label name and compliance level in the comments. (3 Elements)	5

### B. Good Manufacturing Practices

Rating

<b>1. A DOCUMENTED GMP PROGRAM HAS BEEN ESTABLISHED. IT COMPLIES WITH ALL APPLICABLE REGULATIONS. (1 Element)</b>	5
2. Signage that identifies applicable employee hygiene requirements in languages appropriate for employees to understand is present at all entrances to GMP zones. GMPs are posted for employees and visitors and/or they are given a copy of the facility's GMPs. The GMPs or company policy should specify that lack of compliance with the standards might result in disciplinary action. Corrective action procedures must be established for deviations to employee hygiene practices, and records are maintained. (4 Elements)	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## II. Quality Systems

### C. Pest Control

Rating

<p><b>1. A WRITTEN PEST CONTROL PROGRAM HAS BEEN ESTABLISHED. IT MUST INCLUDE A DESIGNATED PEST CONTROL OPERATOR (INTERNAL OR AN OUTSIDE SERVICE), SCHEDULED FREQUENCY OF SERVICE, AND A CURRENT MAP, UPDATED, ANNUALLY, SHOWING THE LOCATION AND TYPE OF ALL PEST CONTROL DEVICES (INTERNAL AND EXTERNAL) (2 Elements)</b></p>	5
<p>2. The pest control files include documentation of all business licenses, proof of indemnity insurance and certification for all PCOs in accordance with state requirements. The files also include a current list of approved pesticides to be used in the facility. MSDS and sample labels for products used. All pesticides, chemicals and compounds used meet applicable regulations and approvals (EPA, USDA, OSHA, etc.). The files are accurate, up-to-date and complete. (3 Elements)</p>	4
<p>3. Service reports, at the frequency described in the contract or in the program, must be up-to-date and available for review. They must show the service performed, types and amounts of chemicals used, EPA or other applicable regulatory registration numbers, the location treated, targeted pests, signs of activity and applicable follow-up actions. Trends in activity must be assessed by the PCO or plant to identify areas of improvement in the pest control program. (4 Elements)</p>	5

### D. Cleaning and Sanitation

Rating

<p>1. A written master cleaning/sanitation schedule lists all areas and equipment in the plant that require cleaning (including processing and non-processing areas and equipment) and provides the frequency of cleaning. Documentation of the person responsible for completing these tasks and the verification that they were completed are available for review. (3 Elements)</p>	5
<p>2. Written sanitation SOPs are established and implemented for all cleaning tasks that involve chemicals or water including tear down procedures if required. They include all necessary and/or regulatory content, such as responsibility, task to be performed, chemicals and equipment to be used. Sanitation SOPs in wet processing environments detail how equipment is to be cleaned and sanitized after being out of service, including the time element for being out of service. Facility maintains current MSDS and labels for all cleaners and sanitizers being used in an organized, accessible and easy-to-use system. (3 Elements)</p>	5
<p>3. A program for conducting ongoing training on cleaning and sanitation procedures and safe chemical handling for sanitation employees, including new sanitation employees and employees who have emergency sanitation responsibility, has been established. Contract production cleaning and sanitizing companies must maintain SSOP and safe chemical training records at the facility. Completion of this sanitation training is documented as to date(s) given, what topics were covered, and who conducted the training and is a part of the employee's records. The training should be conducted annually. (3 Elements)</p>	5
<p>4. A pre-operational sanitation inspection program, with pass/fail criteria is established and includes all production related areas of the facility. Visual inspection is used to assess sanitation prior to the start of production. Pass/fail criteria are established and corrective actions are written and implemented when results of visual inspection show failure. Records of all pre-operational sanitation checks and corrective actions are maintained. (3 Elements)</p>	5
<p>5. An environmental monitoring program using rapid methods and /or microbiological swabbing for pathogens and indicator organisms unique to the product being manufactured should be in place and used to verify sanitation on a pre-defined basis. Pass/fail criteria have been identified. Corrective action procedures are written and implemented when results show failure. Records are maintained and results are reviewed and trended on a routine basis to identify areas for continuous improvement. (4 Elements)</p>	5
<p><b>6. THE FACILITY WATER IS FROM A POTABLE SOURCE. (1 Element)</b></p>	5
<p>7. Water potability is tested annually by a certified laboratory. The sample should be taken from a different location in the facility, each year. Records are maintained. (2 Elements)</p>	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.



## II. Quality Systems

### E. Processes for Controlling Inbound and Outbound Materials

Rating

1. A documented program has been established for approving domestic and international suppliers of raw materials, ingredients and packaging. Facility should have a master list of approved suppliers. (2 Elements)	5
2. An inbound delivery inspection program is required for the ongoing monitoring of all ingredients and materials. Appropriate procedures or monitoring methods are used to document load conditions, including cleanliness of the delivery containers or trailers. They include the examination of incoming materials for evidence of contamination (pest, microbiological, chemical and physical), temperature abuse, damage, quality and condition. Inspection records are documented and filed, including disposition of any rejected product. (2 Elements)	5
3. A written, ongoing monitoring QA program is established to evaluate ingredients, raw materials, and packaging for compliance to specifications. Packaging includes product labels. When letters of guarantee are used to assure compliance, the plant has identified the frequency for their renewal and verification. Ingredients, raw materials and packaging that are monitored via a certificate of analysis upon receipt must be identified on a master list, and the site must have a predefined system for verifying the accuracy of the COA results against the specification. (3 Elements)	5
4. A system for identifying and labeling all incoming packaged and bulk ingredients and packaging materials has been established for traceability. The system must include lot and date code identification. (2 Elements)	5
5. A documented program has been established for verifying that finished products are ready for shipping and distribution. The procedures meet any applicable regulatory requirements and include trailer inspection and load condition. Outside storage facilities (company or independently owned) are identified, and there are defined procedures for verifying the condition and practices used at these facilities. (3 Elements)	5
<b>6. FINISHED PRODUCTS CAN BE TRACED TO THE LOT NUMBERS OR CODE DATES OF ANY INGREDIENTS, RAW MATERIALS AND REWORK USED. (1 Element)</b>	5
7. Finished products can be traced to the food contact/primary packaging materials used. (1 Element)	1
8. Written procedures are established to determine the safety and security of returned goods. Procedures must define how returned products are to be segregated and evaluated for food safety and food security concerns when received. If there is a policy to use returned goods, there must be defined procedures on the controls to be used to insure safety. If the returned goods are to be destroyed, there must be procedures on what methods of disposal will be used. Code dates of all returned goods and all actions taken on the returned goods must be recorded and tracked from receipt to use or disposal. (3 Elements)	5
9. Does this plant buy imported ingredients, raw materials and packaging? Are controls in place to approve and monitor foreign suppliers?	N/A
10. Does this plant use co-manufacturers for any of the products it sells under its labels? Are controls in place to approve and monitor the co-manufacturers?	N/A

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## II. Quality Systems

### F. Process Control Measures for Achieving Product Quality

**Rating**

1. Process control points and applicable limits have been identified for all production lines. There are written procedures for monitoring the control points and the corrective actions to be taken when deviations occur. Records of all process control point monitoring and corrective actions are kept. (3 Elements)	5
2. All measurement equipment for monitoring process control points (e.g., thermometers, scales, pH meters, refractometers) is calibrated according to a defined schedule. The calibration results and any corrective actions are documented. (2 Elements)	5
3. There are written procedures on how to calibrate and maintain all metal detectors or other automated foreign material detection equipment systems. There are written procedures on how to handle product rejected by the detection systems. Records of all calibration checks are maintained. Auditor is to list the type(s) of foreign material detection systems being used by the facility. (3 Elements)	N/A

### G. Maintenance

**Rating**

1. A written program exists for the proper preventive maintenance of all equipment and appropriate areas of the facility. There is an established schedule and a system for verifying that the PM tasks have been completed. (2 Elements)	5
2. A documented program exists for employees to identify items in the facility needing maintenance. A system for reconciliation that maintenance has been completed is in place. (2 Elements)	5
3. There is a written program to address the cleaning and sanitizing of equipment that has undergone repairs, maintenance or re-assembly before being used in processing. Responsibility for monitoring and verifying completion of this process is assigned. Documentation of this sanitation is required. (3 Elements)	5
4. Written guidelines are in place to insure product is protected during all maintenance activities, including actions required to protect exposed and non-exposed product. Guidelines must be in place to ensure product disposition when product has been affected by maintenance activities. (2 Elements)	5
5. Written guidelines are established to ensure tool and parts control when repairs are taking place during production. The guidelines should include proper placement of tools and parts and should address tools used in raw areas versus finished product areas. (2 Elements)	5

### H. Good Laboratory Practices

**Rating**

1. A documented GLP program has been established. It includes steps for the handling and storage of reagents and samples, the test methods to be used, and written SOPs for internal calibration and control procedures for all tests or analyses performed. Lab results are documented and initialed. There is a documented verification program for internal laboratory proficiency for chemical and microbiological testing, and records are available for review. (3 Elements)	N/A
2. All appropriate laboratory equipment is calibrated as scheduled or as necessary and is functioning properly on a continuing basis. The calibration results are documented. (2 Elements)	N/A
3. The on site laboratory is testing for pathogens and has a program in place for running positive controls. Auditor will comment whether the laboratory is in a separate building or located under the same roof as the production facility. (1 Element)	N/A

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## II. Quality Systems

### I. Product Recall Procedures and Customer Communications

**Rating**

1. A documented product recovery program that can trace the distribution of specific production lots and the source of all primary packaging and ingredients used therein has been established and is maintained. The program must comply with FDA/USDA or equivalent guidelines for conducting a product recovery. The program must define procedures for contacting customers. Contact lists for responsible employees and customers are updated annually. Responsibility for managing the recovery program is assigned. (3 Elements)	5
2. Mock recalls are conducted at least every 12 months to assess the effectiveness of the program. The results of the mock recall are on file, available for review, and must include a summary page and copies of all supporting documents. The mock recall should account for 100% of the ingredient, product, or primary packaging tested within 2 hours. Auditor will list the date of the last mock recall, the item tested, and the percentage of product recovered in the comments. (3 Elements)	5
3. Auditor is to conduct a traceability exercise on one item during the audit to verify that the facility can identify, track and locate 100% of finished product lots, raw materials or packaging to first external customer or first level of external distribution, within 2 hours. Auditor will list the item tested and summarize results in the comments. (1 Element)	5
4. A documented program on how to collect and evaluate customer complaints, especially those related to food safety and quality, has been established. There is a system for notifying food safety/QA personnel of applicable customer complaints and for investigation to identify a probable cause and resolution. Customer complaints are summarized on a routine basis to identify areas for continuous improvement. (3 Elements)	5

<b>Possible Points</b>	<b>185</b>
<b>Actual Points</b>	<b>180</b>
<b>Percentage</b>	<b>97.3</b>

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## II. Quality Systems

### Comments

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- II.A.5** Comment only: Self audits are conducted monthly.
- II.A.6** Comment only: Facility product labels included plant identification, USDA Establishment #6423, product name, product grade, Country of Origin, refrigeration / safe handling instructions, boning date / time, code date, weight, and code dating. Review of Beef Omasum Tripe label demonstrated compliance to product specification.
- II.C.1** Comment only: The facility uses Orkin Pest control Company on monthly basis (second two weeks). The plant employees are conducting pest control inspection once per month (first two weeks).
- II.C.2** There is no list of chemicals (pesticides) to be used in the facility.
- II.D.2** Comment only: Cleaning and sanitation is outsourced to DCS, an outside cleaning company.
- II.D.4** Comment only: DCS is conducting proportional inspection.
- II.D.5** Comment only: The facility sponge at three randomly selected sponge sites. The facility is looking for SPC.
- II.D.6** Comment only: The facility uses water from a single well. The water is tested monthly.
- II.D.7** Comment only: The last water test was conducted on May 7, 2010.
- II.E.1** Comment only: The facility has valid supplier approval program.
- II.E.3** Comment only: Ingredients are not used in the facility.
- II.E.4** Comment only: The facility uses receiving date to label incoming packaging materials.
- II.E.5** Comment only: The facility do not use an outside storage space.
- II.E.6** Comment only: Facility code dates all finished products using assigned lot #'s, Julian dates, bone dates, and times of boxing.
- II.E.7** The facility does not trace packaging materials to finished product.
- II.E.9** N/A: Facility does not utilize any imported materials from foreign suppliers.
- II.E.10** N/A: Facility does not utilize any co-manufacturers for any of the products it sells under its labels.
- II.F.1** Comment only: Spinal cord removal on the kill floor is one of examples of process controls.
- II.F.3** N/A: The facility do not use metal detectors.
- II.H.1** N/A: Facility does not have an on-site laboratory.
- II.H.2** N/A: Facility does not have an on-site laboratory.
- II.H.3** N/A: Facility does not have an on-site laboratory.
- II.I.2** Comment only: The last company initiated mock recall was completed on January 4, 2010. Product produced on January 1, 2010 (bnls beef intended for grinding 104,000 pounds). The entire production was accounted for in one hour and 51 minutes.
- II.I.3** Comment only: Mock recall was conducted on bnls beef intended for raw ground. 80,000 pounds produced on May 14, 2010. Entire production was shipped to a single customer in two different shipments. Mock recall was completed in 9 minutes.

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Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

### III. Grounds, Building, & Equipment

#### A. Plant Grounds

#### Rating

1. Roads, yards, grounds, and parking lots are maintained in neat and good condition, and free of trash and litter. Grass and weeds are cut to minimize harborage areas for pests and are not within 20 feet of the building. Ornamental landscaping must not provide harborage next to the building. (3 Elements)	5
2. Plant grounds have adequate drainage to prevent pooling water that can serve as a source of contamination by seepage, foot-borne filth, or provide a breeding place for pests. There should be no evidence of pooled water and no standing water should be observed. (2 Elements)	5
3. Equipment and pipes stored on plant grounds are at least 20 feet away from the buildings or at least 6 inches above the ground and in an organized manner to prevent breeding areas and harborage for pests. Any pipes within 20 feet of the building must have closed ends. (2 Elements)	5
4. Litter and waste are properly stored in enclosed containers. All waste is removed from the premises at appropriate intervals and in such a manner to prevent spillage and litter. The dumpster is on a rigid, cleanable surface. The dumpster areas are cleaned on a regularly scheduled basis and/or are clear of debris and spilled product. (3 Elements)	5
5. The loading dock areas are clear of debris and spilled products. All equipment or items stored on the dock should be clean and organized. All bumpers, levelers and shelters are in good repair and clean. (3 Elements)	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

### III. Grounds, Building, & Equipment

#### B. Plant Facilities

#### Rating

1. Plant buildings and roofs are suitable in construction and designed to facilitate maintenance and sanitary operations. There are no roof leaks. (2 Elements)	5
2. Interior floors, walls, and ceilings are constructed of materials that can be adequately cleaned and maintained in good repair. (3 Elements)	1
3. Adequate screening or other protection is provided for defense against pests. Doors and windows should be closed or screened with no gaps greater than 0.25 inch. Cracks and crevices have been sealed to prevent entrance or harborage of pests. Drains protruding from outer building walls must be screened. (3 Elements)	4
4. Aisles and workspaces between processing equipment and walls are unobstructed and of adequate width to permit employees to perform their duties and protect against contamination. There is adequate lighting in all areas of the facility, including processing, storage, receiving, shipping, locker rooms, restrooms and break areas. (2 Elements)	5
5. All glass and brittle plastic in receiving, shipping, production, and storage areas of the facility are shielded or protected against breakage. (1 Element)	5
6. Adequate ventilation or control equipment is in place to minimize odors and vapors. Fans and other air-blowing equipment are operated and maintained to minimize the potential for contaminating food, equipment or packaging materials. (2 Elements)	5
7. Water lines and hoses are protected against backflow or cross-connections between potable and waste water systems in areas where potential backflow conditions exist. (1 Element)	5
8. Hand wash stations are appropriately located in the processing areas. Hand washing stations have hands-free water and towel operations and are provided with antibacterial soaps, warm water and single use towels or a suitable drying device at all times. Signs in the appropriate languages direct employees to wash and sanitize their hands before they start work, after each absence from their workstation and at any time their hands may become soiled or contaminated. (4 Elements)	3
9. Break areas, locker rooms, and restrooms are maintained in a clean and sanitary condition. They are equipped with proper ventilation and self-closing doors. Drains function properly and are free of standing water. Break areas are separated from the food processing areas and are free of plant garments, aprons, etc. Employee lunches should not be stored in lockers. Ladies restrooms must have covered trash receptacles. Hand wash signage is posted in all of these areas. (3 Elements)	5
10. Ladders and walkways over exposed product lines are protected to prevent potential contamination. Appropriate kick plates are installed as necessary. (1 Element)	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## III. Grounds, Building, & Equipment

### C. Equipment

**Rating**

1. All plant equipment and utensils are designed and constructed to prevent contamination to food products. Food contact surfaces and seams are smoothly bonded. Wooden equipment and / or wooden food surfaces are not used in food processing areas. (2 Elements)	5
2. Equipment is maintained in good repair and is being used for the task for which it was intended. Contact surfaces are corrosion resistant and able to withstand the processing environment. No mold or rust is observed on equipment. (2 Elements)	5
3. Temporary repairs of equipment will not inhibit proper sanitation or be made with materials that contribute in any way to the contamination of the product or environment. (2 Elements)	5
4. Soiled or broken pallets are not used. Empty pallets are not stored near raw material, in food processing, or food storage areas. (2 Elements)	4
5. Vehicles and equipment used for moving raw materials, finished products and packaging throughout the facility are cleaned and maintained in good condition. Fork truck or hand truck batteries are stored segregated from food products and packaging materials. (2 Elements)	5

**Possible Points**      **100**

**Actual Points**      **92**

**Percentage**      **92**

### Comments

- III.B.2**      Damaged floor was observed at several areas of the facility i.e. (fab floor).
- III.B.3**      Man door at the dock has gap on the bottom.
- III.B.8**      There is no hot water at the hand wash sink at the entrance to fab floor.
- III.C.4**      Several broken pallets were observed in the freezer and in the dock area.

**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

## IV. Pest Control

### A. Pest Control

Rating

1. The plant has an adequate number of interior pest control devices. The spacing is at consistent intervals (typically 20-40ft.) around the inside of any exterior wall. Mechanical stations should be within 10 ft. of both sides of doors leading to the exterior, including dock doors. Pest control devices must also be used in dry storage areas, coolers, locker rooms, and break areas. These devices must be located so that they do not contaminate product, packaging or equipment. A number and/or color code must correspond with the master identification map. (3 Elements)	5
2. The plant has an adequate number of tamper-resistant exterior pest control stations spaced at appropriate intervals (usually 25-50 ft.) around the building's exterior perimeter. (If the plant has conducted a risk study with its pest control service within the past 6 to 12 months using the National Pest Management Association standards and the study is available for review, spacing of the exterior stations can be adjusted based on the study results.) Stations are secured in place next to the building, closed, and a key or a tool (e.g., Allen wrench) is required to open. Bait must be anchored inside the stations to avoid being removed by a rodent or floating away during heavy rains. These devices must be located so that they do not contaminate product, packaging or equipment. The number and location code must correspond with the master identification map. (3 Elements)	5
3. Live catch devices and glue boards are checked at least twice monthly. Exterior bait stations are checked at least monthly. The PCO must initial and date the labels and initial punch cards on all devices. These labels should be on the inside of the devices, unless they are mechanical devices with a clear window. (4 Elements)	5
4. All pest control devices must be appropriately positioned and located so that they do not contaminate product, packaging or equipment. Bait must not be used in interior areas. All pest control devices are clean and functioning properly. Bait in the stations has a fresh appearance. (4 Elements)	5
5. The site is controlling external pest activity, based on the pest control reports and observations during the audit. (2 Elements)	5
6. The site is controlling internal pest activity, based on the pest control reports and observations during the audit. (1 Element)	5
<b>7. THERE IS NO EVIDENCE OF DECOMPOSED PESTS ANYWHERE IN THE INTERIOR OF THE FACILITY, INCLUDING IN PEST CONTROL DEVICES. (1 Element)</b>	5
<b>8. THERE IS NO EVIDENCE OF INSECTS, SPIDERS, RODENTS OR BIRDS ON OR IN ANY FOOD INGREDIENTS, PRODUCTS OR PACKAGING MATERIALS. (1 Element)</b>	5
9. Insect light traps (ILTs) (both low and high voltage) and flying insect traps may be used. Placement must be according to manufacturer instructions and comply with applicable regulations. If instructions are not available, ILTs must be between 2 and 5 feet off the ground. High Voltage ILTs must be at least 10 ft. from covered/protected products or packaging and at least 30 ft. from exposed product, packaging, or equipment. Low voltage ILTs must not be above covered/protected or exposed product, packaging or equipment. Low voltage ILTs must also include sticky boards. They must be cleaned and maintained on a scheduled basis. Bulbs must be changed at least annually, and shatter protection must be in place. There must be a schedule for replacing the sticky boards in sticky-type ILTs. (4 Elements)	N/A
10. Avicides are prohibited inside the facility. If used on the exterior, avicides must be used according to program and label requirements. (1 Element)	N/A
11. All pesticides, chemicals and other compounds stored on site for pest control are properly labeled and kept in locked, secured areas away from any food storage or processing areas. (1 Element)	N/A

**Possible Points**      **40**

**Actual Points**      **40**

**Percentage**      **100**

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.



## IV. Pest Control

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### Comments

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- IV.A.9** N/A: Comment only: The facility does not use ILTs.
- IV.A.10** N/A: Avicides are not used in the facility.
- IV.A.11** N/A: Pesticides are not stored in the facility.

## V. Employee Practices

### A. Employee Practices

**Rating**

1. Employees follow written programs on employee hygiene practices, store personal items appropriately, maintain personal cleanliness, and use hygienic practices at all times. (2 Elements)	4
2. Exposed jewelry, except for a plain wedding band, and other objects that might contaminate products like artificial nails and body piercings, are not worn. Objects, such as pens, thermometers, etc. that could fall into food, equipment or containers, are not carried in above-the-waist pockets. (2 Elements)	5
3. Hairnets or other appropriate restraints are properly worn in food processing areas and in other areas of the facility as designated by facility's employee hygiene practices. All employees with facial hair, working in production areas, must wear beard covers. The facility's employee hygiene policy must address all facial hair, including definition for acceptable appearance and when coverage of facial hair such as moustaches is required. (3 Elements)	5
4. Garments worn in the facility (uniforms, aprons, frocks, lab coats, etc.) are clean and appropriate for the operation and do not contribute to potential product contamination. All garments should have snaps not buttons. Outer garments like frocks and aprons are not worn in restrooms, break areas or outside of the facility. Employees adhere to traffic flows when moving through the facility by changing frocks, aprons or uniforms to minimize cross-contamination. (3 Elements)	5
5. Gloves worn in the food processing areas are maintained intact, clean and in good condition. Gloves must be used where there is direct hand contact with ready-to-eat products. Procedures for the proper handling and usage of gloves have been developed, implemented, and verified where required. (3 Elements)	5
6. Eating, chewing gum, drinking and use of tobacco are confined to designated areas outside of the processing and storage areas. (3 Elements)	4

**Possible Points**      **30**

**Actual Points**        **28**

**Percentage**            **93.3**

### Comments

- V.A.1**      An employee was blowing nose and returned to a work station without washing hands.
- V.A.6**      Food wrappers were observed in the freezer.

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## VI. Receiving, Storage, & Shipping

### A. Receiving and Shipping

### Rating

1. All ingredients and materials should be properly identified and labeled. They should include the date of receipt or a verifiable system for first in / first out ( FIFO) or first expired / first out (FEFO) product rotation. Ingredients and primary packaging in storage must be traceable into the production system by the vendor's lot number or the processing facility's assigned system. (2 Elements)	5
2. Products must be maintained in their appropriate temperature ranges. Products are not stored in the shipping and receiving areas, unless proper controls are used to prevent quality, food safety, and / or temperature degradation. Perishable product should not be stored on the cool dock. (2 Elements)	5
3. Shipping and receiving areas are clean, organized, and free of debris and spilled products. Equipment stored on the dock (load bars, bulkheads, etc.) should be organized and in good repair. (2 Elements)	5
4. Temperatures of refrigerated and frozen products are documented at the time of receipt. The temperature monitoring devices being used are available and in good repair. Auditor is to verify that devices cover the temperature ranges of the products being monitored and indicate this in the comment section. (2 Elements)	N/A
5. Transport vehicles used (incoming or shipping) are clean and free of any pest contamination. They are in sound condition and capable of maintaining proper product temperatures and preventing any product contamination. Perishable product transport vehicles must be pre-cooled prior to loading, and documentation of the pre-cooling cycles must be maintained. (3 Elements)	4
6. If ingredients are received in bulk (tanker, rail, etc.) transfer procedures must protect the product from contamination. Hoses must be clean, capped and stored off the ground, and connection ports into the building must be capped and locked when not in use. (3 Elements)	N/A

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## VI. Receiving, Storage, & Shipping

### B. Storage

### Rating

1. Sufficient space (typically 18 inches) is maintained along all walls to permit proper cleaning and inspection for pest activity. No materials are stored within this space. All materials are stored at an adequate height (6 inches or pallet height) above the floor. Easy access to all areas around the walls for cleaning and inspections is provided. (2 Elements)	4
2. Stock rotation practices are used for all finished products. (1 Element)	5
3. All stored ingredients and packaging materials are clean, dry, intact, in good condition, and free from contamination or spoilage. They are properly packaged or covered to prevent contamination of other products. They are stored under appropriate conditions (e.g., dry, cooler and freezer). (3 Elements)	5
4. Any damaged cases or packages are immediately segregated and repackaged or properly discarded. All materials rejected or on hold are properly identified, adequately segregated, and protected from contamination. Product on hold is clearly identified and held under appropriate conditions. (3 Elements)	5
5. Ingredient containers are not reused, unless they are adequately sanitized or have protective liners. Single-use containers from microbiologically sensitive products must not be reused. (2 Elements)	N/A
6. Dry storage areas are maintained in a clean and sanitary manner. All spills are immediately cleaned up; i.e., the floors and racks are not dirty and there is no evidence of spills, trash or other litter. (2 Elements)	5
7. Restricted chemicals for use in processing or as an ingredient are stored in separate, locked areas away from food and packaging supplies. (1 Element)	N/A
8. Racks, floors, walls and ceilings of coolers are in good repair and maintained in a clean, sanitary condition. There is no evidence of aged spills, trash or clutter. Floors are kept dry. (3 Elements)	5
9. Coolers show no sign of condensation, and products stored in coolers should be free from condensation and ice. Cooler temperatures are maintained within the allowable ranges. Monitoring occurs either by checking temperatures manually at least twice a day or via continuous recording systems. (4 Elements)	1
10. Racks, floors, walls and ceilings of freezers are in good repair and maintained in a clean, sanitary condition. There is no evidence of aged spills, trash or clutter. Floors are kept dry. (3 Elements)	5
11. Freezers show no sign of aged frozen condensation or aged ice. Products stored in freezers are free from ice and show no signs of freeze/thaw conditions. Temperatures of freezers are maintained below the maximum allowable temperatures. Monitoring occurs either by checking temperatures manually twice a day or via continuous recording systems. (4 Elements)	5

**Possible Points**      **65**

**Actual Points**      **59**

**Percentage**      **90.8**

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## VI. Receiving, Storage, & Shipping

### Comments

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- VI.A.4** N/A: The facility does not receive any raw materials.
- VI.A.5** Damaged wall was observed on a trailer at a dock. The trailer was just unloaded.
- VI.A.6** N/A: There are no ingredients received in the facility.
- VI.B.1** There was no 18 perimeter for packaging material storage on the dock.
- VI.B.5** N/A: Ingredient containers are not used in the process.
- VI.B.7** N/A: There are no restricted ingredients used or stored in the facility.
- VI.B.9** Heavy condensation was observed in the hot box. No direct product contamination was observed. Temperature in the hot box is 35 degrees F., box cooler was 32 degrees F.
- VI.B.10** Comment only: Floors, walls and ceilings in the freezer are in good repair and maintained in a clean, sanitary condition.
- VI.B.11** Comment only: The freezer temperature was -3 degrees F.

## VII. Plant Sanitation

### A. Cleaning Equipment and Chemicals

**Rating**

1. All chemicals used for cleaning, sanitizing, and processing must be approved for use in a food handling facility and properly labeled. They are used for their intended purposes and they are stored in secure, locked areas away from any food processing or storage. Chemicals that are connected to dilution devices do not have to be in a locked area, if their location does not pose a contamination risk to food, packaging, or equipment. (3 Elements)	5
2. Test kits or sanitizer test strips are routinely used and observed being used to monitor chemical concentration in sanitizing hand dips, foot baths, and sanitizing solutions. Procedures for these checks have been established and are accessible to the employees doing the checks. Records of the checks are documented. (3 Elements)	5
3. Containers, brushes and applicators used for cleaning and sanitizing are color coded or labeled to properly identify them for their intended use. If a color-coding system is used, appropriate signage describing the system in languages appropriate for employees to understand is posted. (2 Elements)	5
4. Cleaning equipment is properly stored (when not in use) and is not stored in food processing areas. The equipment is non-porous and in good repair. (2 Elements)	5

### B. Cleaning, Sanitation & Housekeeping Procedures

**Rating**

1. Cleanliness is maintained in all non-processing and non-food contact areas. The cleanup of spills and accumulation of materials is conducted on a continuing basis during production. (2 Elements)	5
2. Cleanliness is maintained on all food contact surfaces. Significant accumulations of product build-up are not observed during production. (2 Elements)	3
3. Excess moisture and pools of water are removed from equipment and the processing environment. (1 Element)	5
4. Knives, saws, trimmers, and other tools used in processing and for opening ingredient bags and packaging are properly stored, cleaned and sanitized as necessary throughout the production shifts and at the end of the production period. (2 Elements)	5
5. Proper cleaning and sanitizing procedures are followed and are accessible to employees needing them. Equipment is disassembled as necessary to insure thorough cleaning. Equipment in wet processing environments that has been out of service is cleaned and sanitized prior to use per written sanitation SOPs. Results are being documented to verify cleaning and sanitation was completed per procedure. (4 Elements)	5

**Possible Points**      **45**

**Actual Points**      **43**

**Percentage**      **95.6**

### Comments

**VII.A.1**      Comment only: Cleaning chemicals are stored on a trailer off the premises.

**VII.A.2**      Comment only: Sanitizer concentration is recorded on pre-op sign-off sheet.

**VII.B.1**      .

**VII.B.2**      There was excessive amount of meat on the floor by the boning tables.

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## VIII. Processing

### A. Raw Materials & Other Ingredients

### Rating

1. Water reused or recirculated for washing, rinsing, or conveying food must have documented procedures to insure the water is not increasing the level of contamination. These can include microbiological testing, ph and free chlorine levels or other validated processes. Monitoring should occur on a routine basis and records must be available for review. (2 Elements)

N/A

2. Thawing or tempering of frozen materials is done under controlled conditions (e.g., under refrigeration) and is monitored to insure proper temperature controls are maintained. Thawing procedures have been developed that assure safety and quality are maintained, and verification checks of compliance must be documented. (3 Elements)

N/A

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Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## VIII. Processing

### B. Process Control

### Rating

1. Appropriate process control points and limits are observed being monitored on a regular basis. The monitoring results are being recorded, Employees questioned during the audit are aware of and understand how to monitor their control points. Auditor will comment on what was asked and the worker's response. (2 Elements)	5
2. Corrective actions are being taken as required and documented, whenever a process control point is outside of the established criteria or limits. Auditor will review random online monitoring and corrective action records and comment on compliance. (1 Element)	5
3. No equipment or processing operations (such as washing, trimming, sorting and inspection, shredding, extruding forming etc.) used are observed to have the potential to contribute to the contamination and/or adulteration of product with physical, chemical or microbial contaminants that could be introduced into the product. (1 Element)	5
4. No sanitation practices are observed, which could potentially cause product contamination. All food, food-contact surfaces and packaging are adequately protected during clean-ups. The use of hoses, including high-pressure hoses, during production or mid-shift clean-ups or where food or packaging materials are stored is done without causing contamination from water droplets and aerosols. (2 Elements)	5
5. Breakdowns or line shutdowns are monitored to insure time delays, temperature fluctuations and other factors do not contribute to contamination, decomposition, or other safety and quality changes in either the ingredients or products being processed. There are procedures for actions to be taken, when product safety or quality is affected. (2 Elements)	5
6. All perishable product-processing rooms are monitored with a calibrated thermometer. The temperatures of products being processed and/or ingredients being used in the process are observed being maintained in their appropriate temperature range. Auditor is to report the temperatures observed for temperature-sensitive products. (2 Elements)	5
7. Ingredient containers are properly labeled and / or color coded and covered as appropriate. If a color-coding system is used for labeling ingredient containers, signage on use of the containers and equipment is posted in languages appropriate for employees to understand. (2 Elements)	N/A
8. Glass and brittle plastic packaging must be controlled in processing areas. Controls are in place, when glass or brittle plastic containers are used for the storage of raw materials. (2 elements)	N/A
9. Staged packaging materials and ingredients are kept clean, dry and free from contamination during processing. (2 Elements)	5
10. When magnets, screens, sieves, etc. are used in the processing lines, they must be inspected on a scheduled basis to insure proper performance. Inspection records must be documented and maintained. (2 Elements)	N/A
11. Metal detectors or other automated foreign material control systems are used as necessary, if the plant is highly automated, the potential for metal contamination exists, or customers require their use. These systems are online as close to final packaging as possible and must have automatic rejection or line stoppage mechanisms when metal or other foreign matter is detected. The systems are observed being calibrated on a specified frequency with ferrous, non-ferrous and stainless steel standards or as specified by the customer to insure proper functioning. (4 Elements)	N/A
12. Any compressed air or other gases (e.g., carbon dioxide, nitrogen) used in processing, packaging or cleaning are treated in such a way to prevent contamination. (1 Element)	N/A
13. Floors are observed to be free of standing water. (1 Element)	5
14. Maintenance tools, gloves, rags and other miscellaneous materials are not found on or near processing equipment. Tools used for equipment adjustment must be clean and in good repair (no rust, etc.). (2 Elements)	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.



## VIII. Processing

<b>Possible Points</b>	<b>45</b>
<b>Actual Points</b>	<b>45</b>
<b>Percentage</b>	<b>100</b>

### Comments

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- VIII.A.1** N/A: Water is not reused in the facility.
- VIII.A.2** N/A: Thawing or tempering of frozen materials is NOT done in the facility.
- VIII.B.1** Comment only: SRM removal on the kill floor and SRM control in the coolers was observed during the audit.
- VIII.B.2** Comment only: Based on the audit observation there was no need for corrective action.
- VIII.B.6** Comment only: Boning room was 38 degrees F and dock area was 40 degrees F.
- VIII.B.7** N/A: Ingredient containers are not used in the facility.
- VIII.B.8** N/A: The facility does not use glass and brittle plastic packaging as packaging materials.
- VIII.B.10** N/A: Facility does not utilize any magnets, screens, or sieves.
- VIII.B.11** N/A: Facility does not utilize any metal detection equipment.
- VIII.B.12** N/A: Any compressed air or other gases (e.g., carbon dioxide, nitrogen) are NOT used in the process.

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Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

## IX. Food Defense

### A. Program Rating

1. The facility must have a documented food defense plan that designates a multidisciplinary team, which meets at least annually. The team must initially assess all facility operations to determine potential deliberate contamination risks and appropriate strategies to reduce these identified risks. The team must reassess the risks and strategies on at least an annual basis. (4 Elements)	5
2. The facility provides evidence that it meets all regulatory requirements for food defense (FDA's Bioterrorism Act of 2002). These elements include facility records that identify the previous source of ingredients and materials and the next customer (one up and one down the food chain.) Records verifying compliance are maintained for the appropriate time based on product shelf life). (3 Elements)	N/A
3. The plan documents how access is controlled to all receiving/shipping, processing and storage areas within and around the facility. There must be a system for easy identification of employees, who belong around open food and who have access to open food sources, including food packaging materials and equipment that touches food. The ID system has procedures for supervising all non-employees in the facility, including contractors, visitors, outside drivers, etc. The access plan must identify how all critical departments and areas of the facility will be physically secured. (4 Elements)	5
4. The plan identifies the systems and procedures for controlling the integrity of all incoming materials. There are procedures that describe how receiving of raw materials will take place including the matching of seal numbers, evaluation of product integrity and delivery driver identification verification. There must be procedures to address the securing of bulk ingredient ports and the securing of water handling facilities. There is a policy in place describing how unsecured inbound LTL loads are handled which would include 100% inspection for evidence of tampering and documentation of these inspections on receiving documents. (3 Elements)	5
5. There are established procedures for how the manufacturing process and product are protected from deliberate contamination. They must include controlled authorized access for all formulas and all formulation software and tamper evident packaging on finished product. (3 Elements)	5
6. There are established procedures on how the shipment of product is protected from deliberate contamination, including the sealing of outbound trailers, control of LTLs and documentation of drivers. (3 Elements)	5
7. There are policies and procedures in the plan for screening employees. At a minimum, they include a system to screen all employees prior to hiring, including reference checks for all employees and basic felony background checks for supervisors and above. Procedures have been set-up to educate and supervise current employees on how to report suspicious activities. (3 Elements)	4

### B. Observations Rating

1. The facility is complying with their program on restricting areas of the plant to authorized personnel only. The facility has systems in place on how to alert personnel about the restricted areas. All access points are secured or monitored according to the program. (3 Elements)	5
2. All visitors must be in compliance with the facility's program. The visitor policy is posted or provided to all visitors and non-employees. (2 Elements)	5
3. All inbound and outbound trailers are properly sealed or secured. Receiving records and shipping records document the matching of seals to receiving documents or outbound bills of lading. Delivery driver identification is verified. Records document that less than full loads are managed according to the facility policy. Bulk receiving ports and on-site water handling facilities are secured. (4 Elements)	5
4. Formulas and all formulation software are protected by limited access. Tamper evident packaging is utilized. (2 Elements)	5

**Possible Points**      **50**

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

# IX. Food Defense

<b>Actual Points</b>	<b>49</b>
<b>Percentage</b>	<b>98</b>

## Comments

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- IX.A.1** Comment only: Food defense program was reassessed on February 12, 2010.
- IX.A.2** N/A: This is a USDA facility.
- IX.A.7** The facility does not perform a criminal background check for potential supervisory employees and above.

# Good Manufacturing Practices and Food Safety Systems Audit Assessment Rating System

This rating system describes a food facility's level of compliance with recognized food safety and Good Manufacturing Practices or good distribution practices. The point system and definitions are objective guidelines for evaluating the facility's compliance with the assessed standards and are intended to assure consistency in rating. Comments are provided for any standard rated lower than 5.

Questions are scored per the matrix, with 5 being the highest rating possible and 1 being the lowest. If isolated issues for any element are found, an additional one point deduction will be applied to the question's rating OR if numerous issues for any element are found, an additional two point deduction will be applied to the question's rating.

Number of elements in question	>3 elements missed	3 elements missed	2 elements missed	1 element missed	All elements fulfilled	
>3	1	1	3	4	5	<b>Score given to question</b>
3	NA	1	2	4	5	
2	NA	NA	1	3	5	
1	NA	NA	NA	1	5	

#### Definitions:

Single issue - one observation, occurrence or instance of a specific/same issue or element.

Isolated issues - Two observations, occurrences or instances of a specific/same issue or element.

Numerous issues - Three or more observations, occurrences or instances of a specific/same issue or element.

This rating system is an objective guideline. Auditors may use their discretion regarding ratings considering the severity of food safety issues and numbers of observations of issue noted. The comment for non-conformity must be detailed to explain the rating.

Each facility will receive a total overall score based on the ratings of the individual standards in the audit form. The minimum acceptable numerical score may vary depending upon the company requiring the audit.

Rating	Numerical Score	Rating
<b>Excellent</b>	<b>97% or Higher</b>	<b>Meets audit expectations</b>
<b>Good</b>	<b>93 - 96.9%</b>	<b>Generally meets audit expectations</b>
<b>Fair</b>	<b>88 - 92.9%</b>	<b>Partially meets audit expectations</b>
<b>Poor</b>	<b>&lt; 88%</b>	<b>Fails to meet audit expectations</b>

**Items in bold and caps are automatic failure questions if a "1" is scored by auditor.**

# SRM Addendum

*for:*

## **Walt's Wholesale Meats, Inc: Woodland, WA**

**Report Date  
May 27, 2010**

**Audit by  
Dragoslav Pavlovic**

**Silliker, Inc.**

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This audit report sets forth Silliker, Inc. ("Silliker") findings and recommendations as of the date herein. Silliker shall not assume any responsibility for the programs and/or facility being audited nor for events or actions occurring prior or subsequent to this audit. Silliker shall not and hereby expressly disclaims any liability as to whether or not the client and/or the plant carries out the recommendations, if any, as contained in this report.

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# Audit Summary

<b>Company Name: Parent Company:</b>	Walt's Wholesale Meats, Inc	<b>Audit Date:</b>	May 25, 2010
		<b>Start &amp; End Time:</b>	8:00 AM - 2:00 PM
<b>Plant Address:</b>	350 Pekin Road Woodland, Washington 98674	<b>Plant phone &amp; Fax Numbers:</b>	360-225-7433 360-225-6196
		<b>Email:</b>	waltsmeatsinc@comcast.net
<b>Company Associate(s) accompanying auditor (Name &amp; title):</b>	Jason Houser, Programs Manager	<b>Silliker Auditor:</b>	Dragoslav Pavlovic 708-704-3516

<b>Pass/Fail:</b>	Pass
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# Audit Summary

<b>Company associate(s) with whom audit findings were reviewed:</b>	Jason Houser, Programs Manager
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**Auditor Signature:**



Dragoslav Pavlovic 708-704-3516; dragoslav.pavlovic@silliker.com

# I. Specified Risk Material Assessment

## Rating

1. Facility has established procedures for complete removal of Specified Risk Material (SRM) from each carcass. The plant procedure meets or exceeds compliance with the USDA FSIS definition of SRM.	5
2. Procedures that specifically define that SRMs must be adequately removed on the kill floor and prior to the cooler have been established.	5
3. Facility procedures include a final visual inspection of each carcass to ensure the removal of applicable specified risk material prior to entry into the sales cooler.	5
4. No meat from downer animals goes into the raw materials and/or into the finished products. If an animal is observed as a downer, auditor verifies that proper disposition has/is occurring. Downer non-ambulatory animals are defined as livestock that cannot rise from a recumbent position or cannot walk, including, but not limited to those with broken limbs, severed tendons or ligaments, nerve paralysis, fractured vertebral column or metabolic condition.	5
5. Appropriate records are completed, maintained and available for review that verify compliance with the downer animal requirement through recording occurrence of downers and their disposition.	5
6. Auditor verifies that no air injection stunning is being performed by facility.	5
<b>7. PROCEDURES MUST BE ESTABLISHED THAT REQUIRE THAT BONES WITH SRM HAVE NOT ENTERED THE AMR SYSTEM. IF CUSTOMER SPECIFICATION PROHIBITS USE OF AMR IN THEIR PRODUCTS, FACILITY HAS CONTROLS AND IS COMPLYING WITH THE CUSTOMER'S REQUIREMENTS.</b>	N/A
8. Auditor verifies that the facility has controls to ensure that no SRM reaches the fabrication floor. No SRM is found on the fabrication floor.	5
9. Facility has a written procedure requiring the holding of carcasses being tested for BSE until a negative test result is obtained.	5
10. The segregation program for BSE testing includes that the carcasses and any parts removed from the animal being tested have been clearly identified and segregated in the cooler, and will be held until test results are obtained.	N/A
11. Written procedures and practices exist to minimize cross-contamination with SRM from carcass to carcass during production. Controls should include dedicated equipment for SRM removal, color-coding of equipment and tools, using a two-knife system for head removal, and cleaning of the split saw between animals to prevent product build up.	5
12. Employees responsible for the removal of SRMs have been trained and demonstrate an understanding of their job functions. The training records and verification of understanding are documented and available for review.	5
13. All materials defined as SRM are properly labeled, segregated, and disposed of. Documentation is present to verify ongoing compliance.	5
14. Mis-splits of the vertebral column are properly identified and SRM is controlled before entering the cooler. This control should include completely removing the mis-split or removing the SRM material from the misplit before the carcass enters the cooler.	5
15. The auditor verifies the mis-split procedures by visually inspecting 20 carcasses on the kill floor. The auditor is looking for identification of the mis-splits and complete removal of the mis-split or removal of SRM from the mis-split.	5
16. Auditor verifies the SRM removal controls by surveying 100 sides (50 head) in the sales cooler. Note: Auditor must make determination if the operation has separate hot box(es) and sale cooler(s).	5

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.

# I. Specified Risk Material Assessment

17. Facility has established guidelines for the verification of any cattle with age claims of less than 30 months. Cattle under 30 months of age are identified and separated from cattle older than 30 months as necessary for processing. A segregation program exists if facility is slaughtering animals <30 months and >30 months of age. This would include segregating of carcasses in the cooler and identification and segregation of animals >30 months on the kill floor.	5
18. Facility has a self audit program to verify that SRM removal is controlled and monitored prior to entry of the carcasses into the sales cooler.	5
19. Wizard knives used to trim all vertebral regions of animals thirty months and older (in particular the cervical) must have a blade with at least a 2-inch diameter.	5
<b>20. THE FACILITY HAS ON FILE LETTERS FROM FARMS AND FEEDLOTS FOR THE EXCLUSION OF PROHIBITED ANIMAL PROTEINS ON RUMINANT FEED AS DESCRIBED IN 21 CFR 589.2000. AUDITOR RANDOMLY SELECTS 3 INCOMING ANIMAL SHIPMENT PURCHASE ORDERS FOR VERIFICATION.</b>	5

<b>Possible Points</b>	<b>90</b>
<b>Actual Points</b>	<b>90</b>
<b>Percentage</b>	<b>100</b>

## Comments

- .5 Comment only: Daily dead and condemned log is used to document disposition of downers.
- .6 Comment only: No air injection stunning guns are used.
- .7 N/A: The facility does not use AMR Machine.
- .9 Comment only: Facility does not process any animals being tested for BSE but there is procedure that addresses holding and segregation of carcasses being tested.
- .10 N/A: Facility does not process any animals being tested for BSE but there is procedure that addresses holding and segregation of carcasses being tested.
- .13 Comment only: SRM is disposed off in compliance with current regulatory requirements.
- .14 Seven missplits were observed out of one hundred sides inspected during the audit. Those missplits are impossible to verify for presence of SRM.
- .15 Comment only: A single missplit was observed on the kill floor. Spinal cord was removed from the missplit without actually opening a missplit.
- .17 Comment only: All animals are considered to be thirty months and older.
- .19 Comment only: Wizard knives are appropriate size.
- .20 Comment only: Three randomly selected letters from Anderson Dairy, Woodburn Livestock Auction and Wendell, buying station were reviewed during the audit.

Items in bold and caps are automatic failure questions if a "1" is scored by auditor.