Audit Report

FSNS Beef Trim CCP Addendum

Caviness Beef Packers - Hereford
3255 U.S. Highway 60
Hereford, Texas 79045

Audit Date: November 11, 2025
Auditor: Kimberly Herinckx

Audit Summary

Company Name:	Caviness Beef Packers - Hereford	Company ID:	AUCAVHER
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Definitions for the purpose of this Addendum:
Validation - Data that demonstrates there is a pathogen kill when an intervention is operating within specified parameters.
Verification - Demonstration of a microbiological reduction by an intervention when operating in validated parameter(s).
Monitoring - Checking / reading of intervention parameters / measurements (ex. Temperature, concentration, etc.).

PLEASE NOTE: A “NO” answer does not necessarily represent a deficiency in a facility’s programs or processes.

Beef Trim - CCP Addendum

1 HACCP

1	HACCP	
1.1	Adequacy of the HACCP plan is reassessed by the establishment on an annual basis or whenever changes occur that could affect the hazard analysis or alter the HACCP plan. Review the establishment's HACCP reassessment log to identify the last reassessment.	Yes
Comment:	HACCP plans were re-assessed annually at a minimum or for process changes. The plans were most recently re-assessed in January 2025.	
1.2	The establishment maintains records to demonstrate that responsible personnel have been trained in monitoring activities as described in their HACCP plan.	Yes
Comment:	CCP training was refreshed annually. Training records for 2025 were available for current staff.	
1.3	The establishment maintains records that confirm corrective actions are taken when there is a deviation from a critical limit.	Yes
Comment:	Corrective actions were identified to bring CCP deviations back under control per 9 CFR 417.3; outlined in the HACCP Plan and included responsible individuals in the event of an HACCP deviation and the requirement of direct observation of corrective actions. Records for ZT failures on carcasses and offal, hot water and lactic cabinet failures were reviewed from 2025.	

2 Interventions/Process Aids - Steam Vacuum

2	Interventions/Process Aids - Steam Vacuum	
2.1	The establishment uses the steam vacuum intervention method.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.2	The establishment identified this intervention as a CCP.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.3	If the Steam Vacuum is a CCP, can the line run if this intervention is not operational or not in specification.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.4	The establishment has the following validation documentation for this intervention:	
2.4.1	None	Not Applicable

Comment:	Steam vacuums were not utilized.	
2.4.2	Validated Third Party Challenge Study or Validation Study	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.4.3	In-house Challenge Study or Validation Study	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.4.5	Resource white paper (Published Journal Article)	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.4.6	Resource white paper with third party review (peer reviewed paper - not published)	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.4.7	Other -- List in comments	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.5	The following was used to design the validation study(ies):	
2.5.1	A specific set of samples were chosen to support the validation hypothesis (objective).	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.5.2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.5.3	Scientific support documentation.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.5.4	Validation study was prepared by a third party. List the name of the third party in comments.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.5.5	Other -- List in comments	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.6	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Not Applicable
Comment:	Steam vacuums were not utilized.	
2.7	The establishment has documented procedures that include the following:	
2.7.1	The establishment has documented procedures that include the following: Operation of this intervention method	Yes

Comment:	Steam vacuums were not utilized.	
2.7.2	Temperature monitoring	Yes
Comment:	Steam vacuums were not utilized.	
2.7.3	Vacuum monitoring	Yes
Comment:	Steam vacuums were not utilized.	
2.7.4	Steam pressure monitoring	Yes
Comment:	Steam vacuums were not utilized.	
2.7.5	Removal of contamination (Must follow regulatory guidelines of 'less than one inch')	Yes
Comment:	Steam vacuums were not utilized.	
2.7.6	Maintenance of the intervention equipment	Yes
Comment:	Steam vacuums were not utilized.	
2.7.7	Observation of the intervention in operation	Yes
Comment:	Steam vacuums were not utilized.	
2.7.8	None of the above.	Yes
Comment:	Steam vacuums were not utilized.	
2.8	Operators of the steam vacuum(s) are following documented procedures as written for this intervention. If no, list findings in comments.	Yes
Comment:	Steam vacuums were not utilized.	
2.9	The establishment's intervention operating parameters fall within the validation supporting documentation parameters	Yes
Comment:	Steam vacuums were not utilized.	

3 Interventions/Process Aids - Thermal Intervention

3	Interventions/Process Aids - Thermal Intervention	
3.1	The establishment uses the Thermal (hot water or steam pasteurization) intervention method.	Yes
Comment:	The site used a 180°F pre evisceration wash cabinet and a 185°F final hot water pasteurization cabinet.	
3.2	The establishment identified this intervention as a CCP.	Yes
Comment:	The final hot water pasteurization cabinet was a CCP.	
3.3	If the Thermal (hot water or steam pasteurization) intervention is a CCP, can the line run if this intervention is not operational or not in specification.	No
Comment:	The line could not run with if the hot water pasteurization cabinet was not functional.	

3.4	The establishment has the following validation documentation for this intervention:	
3.4.1	None	Not Applicable
Comment:	N/A	
3.4.2	Validated Third Party Challenge Study or Validation Study	Yes
Comment:	In-Plant Validation of Antimicrobial Interventions Used for Reduction of *E. coli* O157:H7 on Beef Carcasses and Trim. FSNS, May 23, 2021.	
3.4.3	In-house Challenge Study or Validation Study	Yes
Comment:	2025 Quarterly In-House Process Validation.	
3.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	No
Comment:	None	
3.4.5	Resource white paper (Published Journal Article)	No
Comment:	None	
3.4.6	Resource white paper with third party review (peer reviewed paper - not published)	No
Comment:	None	
3.4.7	Other -- List in comments	No
Comment:	None	
3.5	Validation Study Design	
3.5.1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes
Comment:	Sets of 40 carcasses were chosen for the study.	
3.5.2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes
Comment:	APC, Coliforms, and generic *E. coli* reduction were used to support the hypothesis.	
3.5.3	Scientific support documentation.	Yes
Comment:	Microbiological test results supported the conclusion.	
3.5.4	Validation study was prepared by a third party. List the name of the third party in comments.	Yes
Comment:	FSNS Laboratories prepared the in house validation.	
3.5.5	Other -- List in comments	Not Applicable
Comment:	N/A	
3.6	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes

Comment: On going verifications included hourly CCP monitoring, quarterly Process Validations, which consisted of sampling carcasses pre and post interventions for APC, generic *E. coli*, and coliforms, and sampling of one out of every 300 carcasses produced for generic *E. coli*.

3.7	Documented Procedures	
3.7.1	Operation of this intervention method.	Yes
Comment:	Operating procedures were in the manufacturer produced owner's manual.	
3.7.2	Training records for the maintenance of this intervention equipment.	Yes
Comment:	Maintenance training records included instruction on the hot wash cabinet.	
3.7.3	Checking the nozzles to ensure that they are not plugged and that they are all functioning.	Yes
Comment:	Nozzle function was verified hourly during CCP monitoring	
3.7.4	Checking the position of the arbors (are they moving correctly, or if stationary, are they aimed correctly).	Yes
Comment:	Arbor function was verified during hourly CCP monitoring.	
3.7.5	Start-up and shut-down procedures.	Yes
Comment:	Start up and shut down procedures were in preventive maintenance instructions.	
3.7.6	There is documentation of a monitoring process that assures that the water or steam is as least 160°F at the carcass surface.	Yes
Comment:	A thermometer was attached to the surface of a carcass and passed through the pasteurization cabinet to verify carcass surface temperature once per period.	
3.7.7	The establishment monitors dwell time.	No
Comment:	Dwell time was not monitored.	
3.7.8	The establishment ensures that all areas and/or surfaces of the carcass are adequately covered by water or steam.	Yes
Comment:	Start up and shut down were documented in preventive maintenance records.	
3.7.8	The establishment documents monitoring of start-up and shut-down.	Yes
Comment:	Operating parameters were within validation parameters.	
3.8	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	Yes
Comment:	Operating parameters were within validation parameters.	

4 Interventions / Process Aids -- Chemical Applications

4	Interventions / Process Aids -- Chemical Applications

4.1 The establishment uses Chemical Application(s) as an intervention method. Yes

Comment: Acidified Sodium Chlorite (ASC) was used as an either/or processing aid in conjunction with the 180°F pre wash cabinet. Lactic acid or ASC was applied to carcass sides just prior to entering the chilling cooler (CCP). Hypobromous acid was applied to carcasses in the spray chill. ASC was applied to carcasses prior to fabrication (CCP). Lactic acid was applied to sub-primals at the end of boning tables before packaging, and to trimmings just prior to combo fill.Offal Lactic Acid or ASC Cabinet(CCP), monitoring of offal lactic acid cabinet for application, concentration, temperature, or pH, and pressure hourly with critical limits of 2-5% concentration, temperature range of 75°F - 150°F, and full coverage. ASC (acidified sodium chlorite) operating parameters with critical limits of 500-1200 ppm concentration, pH between 2.3- 2.9, and visual verification of full coverage by QA or trained designee.

4.2 NOTE: Answer the following questions for each designated CCP. Yes

The establishment identified this intervention as a CCP.
If YES, identify the location of the application (ex. Post-evis lactic acid).

Comment: Lactic acid applied to carcass sides prior to leaving the kill floor was a CCP. Variety Meats Lactic Acid Wash cabinets were a CCP.

List each intervention chemical (ex. Lactic acid, peracetic acid, chlorine, Sanova, SYNTRx) being utilized and the location of use. Verify that the establishment has FSIS Regulatory approval or other record of approval for the chemical(s) in use. Identify CCPs with parentheses.

ASC was used as an either/or processing aid in conjunction with the 180°F pre wash cabinet. Lactic acid or ASC was applied to carcass sides just prior to entering the chilling cooler (CCP). Hypobromous acid was applied to carcasses in the spray chill. ASC was applied to carcasses prior to fabrication. Lactic acid was applied to sub primals at the end of boning tables before packaging, and to trimmings just prior to combo fill. Offal Lactic Acid or ASC Cabinet (CCP), monitoring of offal lactic acid cabinet for application, concentration, temperature, or pH, and pressure hourly with critical limits of 2-5% concentration, temperature range of 75°F - 150°F, and full coverage. ASC (acidified sodium chlorite) operating parameters with critical limits of 500-1200 ppm concentration, pH between 2.3- 2.9, and visual verification of full coverage by QA or trained designee.

4.3 If the Chemical Application is a CCP, can the line run if this intervention is not operational or not in specification. Yes

Comment: The site maintained validation stating that ASC could be applied if the slaughter lactic acid cabinet was not functional.

4.4 The establishment has the following validation documentation for this intervention:

4.4.1 None Not Applicable

Comment: N/A

4.4.2	Validated Third Party Challenge Study or Validation Study	Yes
Comment:	In-Plant Validation of Antimicrobial Interventions Used for Reduction of Escherichia coli O157:H7 on Beef Carcasses and Trim. FSNS, May 23, 2021.	
4.4.3	In-house Challenge Study or Validation Study	Yes
Comment:	2025 Quarterly In-House Process Validation.	
4.4.4	Third Party review of in-house challenge study or validation. List the name of the Third Party in Comments.	No
Comment:	None	
4.4.5	Resource white paper (Published Journal Article)	No
Comment:	None	
4.4.6	Resource white paper with third party review (peer reviewed paper - not published)	No
Comment:	None	
4.4.7	Other -- List in comments	No
Comment:	None	
4.5	Validation Study Design	
1	A specific set of samples were chosen to support the validation hypothesis (objective).	Yes
Comment:	Sets of 40 carcasses were used to validate the study.	
2	Statistical parameters were used in the validation hypothesis and/or the analysis to support the conclusion.	Yes
Comment:	APC, Coliforms, and generic *E. coli* reduction were used to support the hypothesis.	
3	Scientific support documentation.	Yes
Comment:	Microbiological test results supported the study.	
4	Validation study was prepared by a third party. List the name of the third party in comments.	Yes
Comment:	FSNS Laboratories prepared the validation study.	
5	Other -- List in comments	Not Applicable
Comment:	N/A	
4.5.1	The establishment has records demonstrating on-going verification activities for this intervention. List the Frequency in comments.	Yes
Comment:	On going verifications included hourly CCP monitoring, quarterly Process Validations, which consisted of sampling carcasses pre and post interventions for APC, generic *E. coli*, and coliforms, and sampling of one out of every 300 carcasses produced for generic *E. coli*.	

4.6	Documented Procedures	
1	The establishment has documented procedures that include the following: Operation of this intervention method, including application of the treatment	Yes
Comment:	Procedures for operation were in preventive maintenance instructions.	
2	Preparation of the treatment solution(s)	Yes
Comment:	Solution preparation was included in preventive maintenance instructions	
3	Start up of the intervention equipment	Yes
Comment:	Start up procedures were included in preventive maintenance instructions.	
4	Shut down of the intervention equipment	Yes
Comment:	Shut down procedures were included in preventive maintenance instructions.	
4.6.1	The establishment monitors and has set lower limits on the concentration of the treatment solution. Specify in the comments if TITRATION or CONDUCTIVITY is used to monitor the solution concentration.	Yes
Comment:	Concentration was verified by titration hourly during CCP monitoring. Lower limits were established.	
4.6.2	The establishment monitors the temperature of the treatment solutions.	Yes
Comment:	Temperature was monitored hourly during CCP monitoring.	
4.6.3	The establishment monitors the flow / volume	No
Comment:	Flow or volume were not monitored.	
4.6.4	The establishment monitors the nozzle pressure.	Yes
Comment:	Nozzle pressure was monitored hourly during CCP monitoring.	
4.6.5	The establishment ensures all areas and/or surfaces of the carcass are adequately covered by the chemical application.	Yes
Comment:	Carcass coverage was monitored during hourly CCP monitoring.	
4.6.6	The intervention method is implemented as written in the documented procedure.	Yes
Comment:	The intervention was operated according to documented procedures.	
4.7	The establishment's intervention operating parameters fall within the validation supporting documentation parameters.	Yes
Comment:	Concentration was verified as 4.6% and remaining operating procedures were within supporting validation parameters.	
4.8	Alternate / Novel Interventions / Process Aids	

4.8.1	Is / Are there alternative intervention methods(s) being utilized other than those listed in the previous pages	No
Comment:	Alternative interventions were not utilized.	

5 Dressing Procedures / Critical Job Tasks

5	Dressing Procedures / Critical Job Tasks	
5.1	Is there an intervention or process aid utilized upon entering or exiting the out rail.	Yes
Comment:	ASC was applied to carcasses exiting the outrail.	
5.2	The establishment designates and has documented descriptions of critical job tasks (i.e., skinning line, evisceration, etc.).	Yes
Comment:	Critical job tasks were defined in Slaughter Job Positions.	
5.3	The establishment uses hot water or chemical solution to sanitize equipment (i.e., knife, steel, hook, etc.) during operations.	Yes
Comment:	180°F water was used to sanitize equipment.	
5.4	The establishment uses the following to ensure that knives are in the sanitizer dip long enough to sanitize: List which methods are utilized in which process i.e. multiple knife rotation on skinning line, 1-2 second dip post skinning, etc.	
5.4.1	The establishment uses the following to ensure that knives are in the sanitizer dip long enough to sanitize: List which methods are utilized in which process i.e. multiple knife rotation on skinning line, 1-2 second dip post skinning, etc. Knife blade stays in the dip 1-2 seconds.	Yes
Comment:	A 1-2 second dip was utilized for post hide removal trimming tasks.	
5.4.2	Knife blade stays in the dip 2-3 seconds.	No
Comment:	None	
5.4.3	Knife blade stays in the dip for 4-6 seconds.	No
Comment:	None	
5.4.4	Multiple knife rotation.	Yes
Comment:	Multiple knife rotation was utilized from sticking through evisceration	
5.5	The establishment sanitizes all equipment (hooks and knives) between each use to reduce cross contamination in the process when trimming visible contamination (i.e., fecal, hair, or dirt.).	Yes
Comment:	Equipment was sanitized with 180F water between each use.	
5.6	There is an auditing / observation process for monitoring of critical job tasks	Yes

Comment:	Sanitary Dressing Hide On audits were conducted every half hour. Sanitary Dressing Hide Off audits were conducted hourly.	
5.7	Type(s) of monitoring at the establishment:	
5.7.1	Type(s) of monitoring at the establishment:	Yes
	Auditor	
Comment:	QA staff conducted sanitary dressing audits every half hour, or every hour.	
5.7.2	Supervisor	Yes
Comment:	Supervisors monitored staff continually. Observations were not documented.	
5.7.3	Video	Not Applicable
Comment:	N/A	
5.7.4	Other -- List in Comments	Not Applicable
Comment:	N/A	
5.8	The Auditor declares that he/ she does not have a conflict of interest with this auditee and the audit has been carried out independently and impartially.	Yes
Comment:	I, Kimberly Herinckx, do not have a conflict of interest with this audit client.	