January 3, 2011

Dear Valued Customer:

Harris Ranch Beef Company (HRBC) Est. #783 is committed to food safety. We are a federally inspected establishment and have written HACCP and SSOP programs that are in compliance with all USDA/FSIS regulatory requirements. This includes the reassessments performed in reference to FSIS Notice 44-02 identifying *E. coli* O157:H7 as a hazard that is reasonably likely to occur and 65-07 Notice of Reassessment of *E. coli* O157:H7 Control and Completion of Checklist for all beef operations. We also perform annual reassessments as required.

Throughout our harvest process, we have intervention devices to address pathogens including *E. coli* O157:H7 and *Salmonella*. They are a combination of steam vacuums, hot water pasteurization, and organic acid spray. Our hot water pasteurization and organic acid spray are validated pathogen interventions, and thus classified as Critical Control Point in our HACCP Plan which are respectively monitored for temperature and acid concentration. They are recognized as having the capability of reducing *E. coli* O157:H7 to an undetectable level. This is based on the following research:

1. Castillo, A., L. M. Lucia, K. J. Goodson, J. W. Savell, and G. R. Acuff. 1998a. Use of Hot water for beef carcass decontamination. J. Food Prot. Vol. 61 No. 1:19-65.
2. Castillo, A., L. M. Lucia, K. J. Goodson, J. W. Savell, and G. R. Acuff. 1998b. Comparison of water wash, trimming, and combined hot water and lactic acid treatments for reducing bacteria of fecal origin on beef carcasses. J. Food Prot. Vol 61 No. 7:823-828.

This intervention system is also verified and validated by our internal data including weekly carcass swabs for APC, coliform and generic *E. coli*. Additional testing includes generic *E. coli* in accordance with regulatory requirements as stated in 9 CFR 310.25(a), as well as, compliance with the *Salmonella* Performance Standards. Our carcass chill process is identified as a Critical Control Point where temperature reduction is monitored in order to control pathogen growth following harvest and prior to Fabrication. A cold chain management protocol is utilized throughout the handling and shipping processes.

Further validation of our process is achieved through internal testing of raw materials produced in our fabrication department and intended for use in raw ground production, as well as, head, cheek, heart and weasand meat produced in our Variety Meats department. HRBC

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2. *Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems:*
   HRBC does not produce AMR product.
3. *Prohibition of the Use of Certain Stunning Devices to Immobilize Cattle During Stunning:* HRBC does not utilize air injected stunning equipment.

As required under 9 CFR 417.4(a)(3), HRBC has reassessed its HACCP Plan for the SRM Final Rule effective October 1, 2007.

Meat offered for sale is derived from cattle that have been fed materials in compliance with the FDA regulation 21 CFR 589.2000. This regulation prohibits the feeding of ruminant meat and bone meal to ruminant animals. Documentation is maintained to substantiate this claim and verify compliance.

Harris Ranch Beef Company is audited at least annually by a 3rd party which includes GMP's, Food Safety, Animal Welfare, SRM's and Verification/Validation of *E. coli* O157:H7 testing (N60).

Harris Ranch Beef Company is committed to ensuring our customers receive the safest and highest quality products possible. All programs are available for review onsite. If you have any questions or need clarification pertaining to the aforementioned, please let me know.

Sincerely,

Lauren Luqué, MS
Food Safety Manager
Harris Ranch Beef Company

possible. Harris Ranch Beef Company and Harris Ranch Feeding Company incorporate the latest technology and professional consultations in our efforts to continue to lead the industry in these initiatives. We can assure the best possible treatment of our animals.

Specified Risk Materials (SRM's) are handled in accordance with all USDA/FSIS regulatory requirements, including the SRM Final Rule, "Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle" (and subsequently published "Requirements for the Disposition of Cattle that Become Non-Ambulatory Disabled Following Ante-Mortem Inspection" on March 18, 2009 to augment the previous rule); "Disposition of Non-Ambulatory Disabled Cattle", FSIS Notice 74-10 Issued 12/22/10; "Prohibition of the Use of Certain Stunning Devices Used To Immobilize Cattle During Slaughter" issued in the Federal Register July 13, 2007; effective on October 1, 2007 specifically listed as:

1. *Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle*
   a. *Non-ambulatory disabled animals are unfit for human food:*
      HRBC does not accept or harvest non-ambulatory animals.
   b. *All cattle – tonsils and distal ileum are inedible:*
      The tonsils are removed from all carcasses.
      Eighty inches of the small intestine including the distal ileum, as measured from the ileocecal junction is discarded to inedible rendering.
   c. *Cattle 30 months and older – the brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column are inedible (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae and the wings of the sacrum):*
      HRBC relies on cattle birth records and/or dentition to determine the age of all cattle and segregates those identified as 30 months and older. Our segregation procedures assure that the SRM's have been removed and properly disposed of as inedible. Bone-in products (that include the vertebral column) are produced from animals that are under 30 months of age. If it is necessary to produce bone-in product from animals that are 30 months of age and older, specific written procedures are followed to control the SRM (vertebral column) as required by USDA/FSIS regulatory requirements, including proper documentation with customer order. In addition to meeting USDA/FSIS regulatory requirements for Specified Risk Materials (SRM's), some customers consider the spinal cord, dura and dorsal root ganglia as an SRM in cattle of all ages, therefore, HRBC also removes the spinal cord, sheath (dura) and dorsal root ganglia (DRG) that extends from the spinal channel on all carcasses.

defines a lot as being up to three combo bins or three pallets of boxed raw material. Variety Meat items are each defined as one day's production.

Each lot is tested using N60 (robust) testing methodology where 375 grams from each lot is tested for *E. coli* O157:H7 utilizing the AOAC approved *Strategic Diagnostics Inc.* rapid screening test. The testing is performed by an outside laboratory and the raw material is controlled under our internal Test and Hold program. Any potential positive arising from this test is further analyzed using PCR technology (BAX MP or GDS) and could then also include cultural confirmation. Sub-primals may also be tested, per customer request, using the same testing methodology. If testing is requested and performed, negative results are faxed to customers in the form of a Certificate of Analysis (COA). Customer specific testing requirements may also be performed on a case by case basis (i.e. BAX MP PCR and GDS PCR).

Quarterly verification testing is also performed for *E. coli* O157:H7. The testing includes performing one sampling verification during the first and fourth quarters and three during the second and third quarters. The quarters are defined as: January – March; April – June; July – September; October – December. The samples are collected using N60 methodology and are analyzed by an outside laboratory utilizing BAX MP PCR or GDS PCR technology.

In the event of an emergency, written Recall Procedures are in place to aid in tracking all affected products and assuring proper notification to customers, government agencies, news media, etc. The program includes a listing of team members with assigned responsibilities to assure prompt action. Mock recalls are performed at least twice annually. The company also has a written Food Defense program to assure systems are in place to prevent the risk of intentional food contamination. The facility is fenced in and access is controlled by a security service.

Other pre-requisite programs in place include but are not limited to:

Pest Control: Licensed Technician

Allergen Control: Written procedures to assure allergens are controlled within our facility

Employee training: Upon hire and ongoing training is accomplished through monthly line meetings. This includes but is not limited to: HACCP, SSOP, GMP's, Product Handling, Employee Hygiene, etc.

Metal Detection: Utilized on boneless beef trimmings, ground product, fully cooked products, and portion control products

HRBC maintains a comprehensive written Animal Welfare program which is in compliance with all USDA/FSIS regulatory requirements and is based on AMI's Recommended Animal Handling Guide, 2010 Edition. Proper handling of livestock is extremely important to all in the meat production chain, both ethically and economically. Harris Farms Inc. has long recognized the value of training its' employees to treat the animals in the most humane way