



National Beef

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February 3, 2011

Subject: FOOD SAFETY

To Whom It May Concern:

National Beef Packing Co. LLC, Est. 208A, Est. 262, and National Beef California, LP Est. 21488 have implemented approved HACCP Programs and have periodically reassessed our established HACCP Programs and SSOP Programs as per all FSIS Notices and regulations.

National Beef's Food Safety process utilizes a multiple microbial reduction strategy that maintains the highest quality of product possible. National Beef's multiple microbial reduction process includes numerous process aids and a validated CCP intervention:

- (a) Steam vacuums
- (b) Steam hock blow offs
- (c) Pre-Evisceration Carcass rinse with Organic acid spray
- (d) Thermal Pasteurization (Hot carcass wash) – Plant CCP step designed and validated with both scientifically peered and in-house microbial data to help eliminate or reduce pathogenic microbial (*E.Coli O157:H7*) to below detectable limits. CCP is monitored and validated on a daily basis
- (e) Acidified Sodium Chlorite Carcass
- (f) Carcass Cooler Organic Acid carcass sprays
- (g) Continued cold chain management throughout the remaining processes of the facility.
- (h) In addition to these interventions we have traditional inspection and trimming throughout the slaughter floor.
- (i) Primal and sub-primal products are subject to an antimicrobial spray after trimming but prior to or at bagging. The antimicrobial treatment has been tested in our establishments and has shown to be effective in the reduction of bacteria and is monitored as per our application program.

National Beef has met the FSIS requirements of Notice 44-02 and validates its systems through monitoring of the hot water wash critical limits and routine testing of carcasses and trimmings for presence of *E. coli O157:H7* on a daily basis as well as testing carcasses for Generic *E.Coli* as per 9CFR. Our facilities are also in compliance with FSIS regulated Salmonella testing on carcasses and ground beef. National Beef considers Food Safety our number one priority. Our HACCP Programs helps us to ensure that all products produced in our facilities are the safest in the industry. National Beef is in compliance with the FDA Bioterrorism Act and is registered.

All cattle suppliers to National Beef are required to have current (within the past calendar year) signed affidavits on file attesting to compliance with all FDA feed and drug regulations. Suppliers who do not have a current affidavit on file in our Kansas City headquarters are not eligible for marketing livestock to National Beef.

National Beef has implemented the appropriate programs/policies to ensure compliance with FSIS Notice 56-07 and 9 CFR Parts 310, 311, 313, 319, etc. These Notices and Rules deal with three Regulations that prohibit the slaughter of non-ambulatory disabled cattle, a description and requirement to remove specified risk material (SRM) that are considered to be inedible, and restricts the use of captive bolt stunners that deliberately inject compressed air into the cranium of an animal and does not allow "pithing".

- National Beef has programs and policies in place that prohibits the use of classified non-ambulatory (downers) from our edible process.
- We are currently identifying all animals that are classified as 30 months of age or older using dentition identification on the slaughter floor. These identified carcasses have the vertebral column (excluding the vertebrae of the tail, the transverse process of the



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thoracic and lumbar vertebrae, and the wings of the sacrum), removed on the fabrication floor.

- All SRM's are removed from the edible food chain (from all animals - all tonsils and the distal ileum of the small intestine; and from animals 30 months or older the head – skull, eyes, brain, and trigeminal ganglia; and the vertebral column – spinal cord and dorsal root ganglia).
- The captive bolt stunner that National Beef uses does not inject air into cranium of the animal nor does National Beef use any “pithing process” in stunning or SRM removal.

National Beef facilities are Federally Inspected Establishments that are required to meet the requirements of 9CFR 416 and 417. These regulations ensure that our facilities have verified and validated their HACCP Programs and associated CCP's. This is monitored by FSIS Inspection personnel who are required to do so in order for product to contain the FSIS Mark of Inspection.

National Beef is assuring that we have addressed the following regulatory requirements:

- Testing of carcasses for *E. coli* Biotype I (9 CFR Part 310, §310.25), effective June 1997.
- Implementation of SSOP (Sanitation Standard Operating Procedures, 9 CFR, Part 416, §416.11 - §416.17), effective January 26, 1997
- Implementation of HACCP Systems (9 CFR, Part 417, §417.1 - §417.8), effective January 27, 1998 for plants with greater than 500 employees.
- Testing of carcasses and/or ground beef for Salmonella as conducted by USDA in accordance with §310.25.

Federal Register Docket 00-022N, dated 10/7/02 (*E. coli* O157:H7 Reassessment)

- Reassessment of HACCP plans for *E. coli* O157:H7 in accordance with the Federal Register Docket 00-022N, dated 10/7/02
- Completion of annual reassessment of HACCP plans in accordance with 9CFR 417.4 (a) (3) effective January 26, 2004 which included review and verification of adequacy of the HACCP plans in addressing *E. coli* O157:H7.

Directive 6420.2 – Issued 3/31/04

- CCP's are in place and effect for zero tolerance requirements for head meat, cheek meat and weasand meat.

Directive 10,010.1 Revision 2 – Effective 7/31/09

CFR Title 21 Part 589.2000 – Effective 8/4/97

- Prohibits the feeding of ruminant meat and bone meal to ruminant animals

Labeling

- USDA approval for the following label disclaimer/instructional statements are available on site at the producing est.:

Disposition CCP's

- All materials that are tested for *E. coli* O157:H7 that are not negative are addressed within the HACCP plans under a product disposition CCP.
- These materials are controlled and are cooked or otherwise disposed of to inedible.
- Records reflect appropriate disposition of affected material.

Other FSIS Regulations/Notices

- National Beef facilities are Federally Inspected and meet and comply with all FSIS Regulations and Notices including but not limited to FSIS Notice 65-07.

Sincerely,

Brenden McCullough
V.P. Technical Services
National Beef Packing Co. LLC