



06 January 2011

Re: Letter Of Guarantee.

Provimi Foods Inc., Seymour, Wisconsin Est. # 8984 guarantees that all products produced are in full compliance with all USDA FSIS HACCP requirements as set forth in 9 CFR 417 and all FSIS NOTICES and FSIS DIRECTIVES. Supporting documents include but are not limited to Sanitation Standard Operating Procedures (SSOP's), Good Manufacturing Programs GMP's, Pre-Requisite Programs, E.coli O157:H7 Robust testing, Pest Control Management, etc.

HACCP Plans include Harvest, Raw Not Ground, Raw Ground and Fully Cooked Not Shelf Stable. All four plans were reassessed and the reassessments were completed on 26 October 2007 as required by FSIS NOTICE 65-07 dated 10/12/07 for ESCHERICHIA COLI O157:H7 control. It was determined that E.coli O157:H7 is reasonably likely to occur in the absence of controls in the form of intervention steps both in the harvesting and fabrication process. HACCP reassessments are performed as often as necessary but at a minimum of once per year as required by FSIS.

Harvest and Offal intervention steps validated to eliminate, prevent or reduce E.coli O157:H7 below detectable levels include Steam Vacuums (2), 3% Lactic Acid Spray on Carcasses and 3% Lactic Acid Spray on Offal Meats. Additionally, there is a validated CCP for Carcass and Heads Zero Tolerance, Carcass temperatures and Offal temperatures. All intervention steps and CCP's have been validated. Further validation that the plan is working as intended are E.coli O157:H7 carcass and trimming testing using the USDA FSIS Best Practices Robust testing requirements. Raw Not Ground and Raw Ground Plans include a CCP for temperature control as well as E.coli O157:H7 testing. Also included is a Pre-Requisite program requiring Supplier Letters Of Guarantee as well as E.coli O157:H7 results for outside purchased products should the need be to purchase from other suppliers.

Provimi utilizes an outside lab for E.coli O157:H7 testing. Methodology used at the lab is the BAX PCR Method. Trimming samples are extracted using the N-60 Robust testing requirements and Carcasses are swabbed using the N-60 Robust testing method.

Additionally, we have a Pre-Requisite program for receiving products from outside suppliers. All suppliers are required to supply a Letter of Guarantee stating that they have at least one intervention step validated to eliminate, prevent or reduce E.coli O157:H7 to an undetectable level. Also the suppliers are required to perform the equivalent of the USDA FSIS Best Practices N-60 Robust testing on Carcasses or Primals and Trimmings. On a quarterly basis, Provimi

Foods will excise samples for E.coli O157:H7 from outside purchased product to verify the Suppliers E.coli O157:H7 negative claims.

A Risk/Recall Program is also in place and mock recalls are performed twice per year to test the effectiveness of the program.

All Veal Calves slaughtered at our facility are <36 weeks of age. Non-Ambulatory, Downer or Disabled Veal Calves are condemned at receiving per FSIS Regulation 9CFR309.2 and are not utilized in production. Specified Risk Materials (SRM's) associated with veal of this age are the distal ileum and the tonsils both of which are not harvested at our facility, rather are disposed of as inedible. Documented procedures and training are in place verifying the proper removal and disposal of SRM's. Also Advanced Meat Recovery Systems (AMR) are not utilized at our facility or accepted from outside sources. Veal Calves are stunned using a captive bolt device which does not inject compressed air or any type of gas into the cranial cavity.

Third Party Independent Audits for Food Safety, HACCP, Security and Animal Welfare are performed annually. Since the beginning of the Third Party Audits in 1999, Provimi scored >95% for Food Safety, HACCP, Food Security, Pest Control and Animal Welfare and have maintained and received "Gold Certificates Of Recognition". USDA FSIS also does an Animal Welfare and Food Safety Assessment Audit at a minimum of annually.

If you have any questions or require further assistance , please feel free to give me a call at (920) 833-6861 ext 333.

Sincerely,
Bruce Achten
QA Manager
PROVIMI FOODS INC. Establishment 8984



06 January 2009

Re: SRM Statement of Guarantee

To Whom It May Concern:

As of the FSIS NOTICE date of issue, Provimi Foods Inc., Est. 8984 has reassessed all HACCP Plans and is in full compliance with regulation 9CFR309.2(b) prohibiting the slaughter of downer and or non-ambulatory disabled Veal Calves. Non-ambulatory animals are condemned and disposed of per APHIS's directive. Provimi Foods Inc. slaughters and processes exclusively immature bovine calves only that are less than 36 weeks of age using a non-air injection stunning method. Each Grower signs a contract guaranteeing that the animals are <36 weeks old at the time of slaughter. Also per federal regulation 9CFR 318.24, all products received from Provimi Foods Inc. are free of SRM's pertaining to animals less than 30 months of age to include spinal cords, tonsils and the distal ileum (small intestine). AMR's (advanced meat recovery systems) are not utilized at this facility nor are any boneless cuts of meat produced from Mechanically Separated meat as prohibited in the new regulation (9CFR319.5).

Reference USDA FSIS NOTICE 4-04, 5-04, 7-04 and 9-04.

Each supplier whether domestic or imported must be in compliance with all pertinent current regulatory requirements and Codes of Federal Regulations (CFR's) and are required to provide a "Supplier Outside Purchase Guarantee" stating all of the above requirements prior to Provimi Veal Corporation receiving purchased products.

Sincerely,
Bruce Achten
Bruce Achten
QA Manager
Provimi Foods Inc.



06 January 2009

Subject: Live Calf Guarantee.

To Whom It May Concern:

Provimi Foods Inc guarantees that all Formula Fed Veal Calves slaughtered and processed at our facility, Establishment 8984 were born, raised and slaughtered in the United States and are free of non-FDA approved substances to include clenbuterol. Additionally, there are no added illegal substances including clenbuterol to any products during processing. Provimi Foods Inc stance on the use of "hormones" in veal calves is that they are not approved substances and thus are disallowed and prohibited from use. Language prohibiting the use of non-approved FDA substances has been incorporated into our grower "Procurement Purchase Contracts". Additionally we have required each veal calf producer to sign a "Producer Affidavit: specifically addressing the prohibition on use of non-approved anabolic compounds (growth hormone implants).

Provimi Foods employees trained in the detection of implants, implant removal prior to receiving and or missing ears inspect each calf at live animal receiving. Suspicious activity is reported to Plant Management immediately and the animals are rejected. The USDA Veterinarian is notified immediately and takes the appropriate actions. Animals are assigned a lot number and tracked throughout processing. If an animal tests positive for illegal substances post processing, a recall will be initiated and all customers will be notified. This program was effective since 06 June 2004.

If you should have any questions or concerns regarding this guarantee, please call me at (920) 833-6861 ext 333.

Sincerely,
Bruce Achten Bruce Achten
QA Manager
Provimi Foods Inc.



06 January 2009

Re: Provimi Foods Inc. HACCP, SSOP and GMP Letter Of Guarantee, 8984A.

To Whom It May Concern,

Provimi Foods Inc., Seymour, Wisconsin Establishment 8984A currently operates all plant processing therein under the control and oversight of a validated HACCP Plan under the category of Fully Cooked Not Shelf Stable. Process "Critical Control Points" include Cooking, Reducing, Thickening/Reducing, Cooling/Stabilization and Freezer Storage.

Provimi Foods Establishment 8984A is currently registered with the FDA and in full compliance with the Bio-Terrorism Act of 2002. FDA Registration number for the Bio-Terrorism Act of 2002 is Registration #17319546772. Provimi Foods is currently under the inspection of USDA FSIS and FDA. Daily operations are performed under our current USDA FSIS Grant Of Inspection and FDA Inspection/Authorization.

Daily processing controls also include a validated SSOP Plan for all areas of the facility, written GMP's and licensed pest control.

Microbiological testing includes twice per day daily water tests for Total Aerobic Plate Counts and coliforms, twice per week environmental tests for Total Aerobic Plate Counts for product contact surfaces and Listeria tests once per month for environmental on product contact surfaces, non-product contact surfaces and finished product. Listeria finished product samples are sent to an outside USDA approved laboratory and all other tests are performed in our in house lab.

Sincerely,
Bruce Achten
Bruce Achten
QA Manager
PROVIMI FOODS INC.



06 January 2009

Non Ambulatory & SRM Guarantee:

Provimi Foods Establishment 08984 has addressed the requirements in FSIS NOTICE 56-07 dated 8/31/07 as well as FSIS DIRECTIVES 6100.1 and 6100.4 both dated 9/13/07 and are full compliance with all requirements as they are written. Provimi Foods slaughters and processes exclusively Formula Fed Veal Calves 18 to 22 weeks old at the time of slaughter.

Provimi Policy: All non ambulatory disabled calves that cannot rise from a recumbent position or that cannot walk, including but not limited to those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral column or metabolic conditions are condemned. Additionally, calves that already passed Ante-Mortem inspection and become non ambulatory in the barn will be re-presented to the FSIS Inspector who will determine the disposition of the animal at that point. Stunning devices are strictly prohibited on site by Truckers and barn personnel. Air injection knocking devices are not used at our facility or present in our facility.

SRM's associated with veal calves are tonsils and the distal ileum. Tonsils are removed in such a manner so as not to sever the tonsil both at head preparation and at the removal of the Hyoid bones. A program with training has been developed which addresses the possibility of a knife cut into a tonsil. An extra knife in a scabbard is hung next to the operator in a sterilizer containing water in excess of 180 degree Fahrenheit and the knives are switched if contact with the tonsil is made thus sterilizing the knife for approximately one minute, the same as the line speed. The distal ileum is removed with the stomach contents and placed in the inedible evisceration tray where it remains until the end of the line where it is automatically dumped into the floor auger where it is conveyed into the gut truck. The small intestine is not harvested or saved at any time.

If you should have any questions or concerns regarding the information you requested, please call me at (920) 833-6861 ext 333.

Sincerely,
Bruce Achten
Quality manager
Provimi Foods Inc