



To Whom It May Concern:

You have requested some general information regarding the food safety initiatives at Cargill Meat Solutions Corporation harvest plants in the United States and Canada.

By way of background, Cargill Meat Solutions Corporation implemented the USDA Pathogen Reduction HACCP regulation in January 1998 and the USDA Standard Sanitation Operating Procedures ("SSOP's") in 1997.

Currently, Cargill Meat Solutions Corporation's harvest plants located in the U.S. are required to sample carcasses for generic *E. coli* using the protocol designed in accordance with the requirements stated in 9 CFR 310.25(a).

In connection with the October 7, 2002, USDA FSIS notice on *E. coli* O157:H7 prevalence, Cargill Beef has reassessed the HACCP plans for all of the beef harvest plants located in the U.S. As noted in the October 7, 2002 FSIS notice, because of recent research reports indicating that cattle have a higher incidence of *E. coli* O157:H7 than previously reported, establishments that harvest and process raw beef product must include *E. coli* O157:H7 as a "hazard reasonably likely" to occur in all HACCP plans.

As interventions, beef plants have installed pre-evisceration acid rinse cabinets, steam vacuums, post-evisceration acid rinse cabinets, and steam pasteurization cabinets in the fed cattle beef slaughter plants in the U.S. In the Cargill Regional Beef facilities, those companies have installed steam vacuums, an acid rinse cabinet and steam pasteurization cabinets or thermal cabinets. In an attempt to eliminate or reduce *E. coli* O157:H7 to below detectable levels, Cargill Meat Solutions Corporation, beef and its affiliated companies have identified the validated steam pasteurization intervention as a CCP. The critical limit of this CCP is 6 seconds in an environment of 180 degrees. This CCP is validated by use of Data-Pak time/temperature monitoring probes. This critical limit decision is based on the research listed below:

- SPS Process Control System To Reduce the Risk of Pathogenic Bacteria, Leising, Internal Memo.
- Evaluation of a Steam Pasteurization Process in a Commercial Beef Processing Facility, Nutsch et al, Journal of Food Protection, Vol 60, No 5, 1997.

- Comparison of Steam Pasteurization and Other Methods for Reduction of Pathogens on Surfaces of Freshly Slaughtered Beef, Phebus et al, Journal of Food Protection, Vol 60, No 5, 1997.
- Validation and Comparison of a Static Chamber to a Start/Stop Steam Pasteurization System, April 28, 2000, Cargill Meat Solutions Corporation.
- Ecological Relationships between the Prevalence of Cattle Shedding Escherichia coli O157:H7 and Characteristics of the Cattle or Conditions of the Feedlot Pen, Smith et al, Journal of Food Protection, Vol 64, No 12, 2001.
- Correlation of Enterohemorrhagic Escherichia coli O157 prevalence in feces, hides, and carcasses of beef cattle during processing, Elder et al, PNAS, Vol 97, No. 7, 2000.

In addition, beef plants perform extensive microbiological tests on carcasses and other beef products that serve as verification that the intervention system is functioning as planned. Moreover, all plants also do routine environmental sampling at a variety of points in the production system. Depending on the plant, the microbiological tests include testing for Aerobic Plate Count (APC), coliforms, and generic *E.coli* for pre-operational cleanliness, environmental sampling for both sanitation and pathogen monitoring and product sampling for both product quality and safety. These tests are monitored on an ongoing basis for trend analysis of plants and products. As a part of our continuing food safety efforts, Cargill Meat Solutions has instituted a Test and Hold program on finished chub packaged ground beef or all the components used to make ground beef. Statements of testing compliance are on the transportation bill of lading. A 'Notification Document' is sent to the customer receiving the trim (the 'ship to' customer). This information contains the lot number of the product, the result, test method and other comments regarding the lab results. If you were not considered the 'ship to' customer, then this information would be sent to your sales representative or broker. A similar Test and Hold program is used for beef trimmings to be used in raw ground products as well as Hearts, Head Meat, Cheek Meat, Weasand Meat, PDCB and FTB. In addition, we have a third party verification program of our N-60 program. Under this program, our raw ground beef components are ground, sampled and analyzed to verify the effectiveness of our sampling and laboratory. This program can be used to meet FSIS best practice expectation that our customers conduct on-going verification of its incoming product. If you wish more information on how you can use this program to meet regulatory expectations for your operation, please contact us.

On October 26, 2007, a reassessment was completed in all U.S. beef plants harvest facilities. As part of this reassessment it was determined to communicate to you certain aspects of our E.Coli verification-testing program.

1. A N60 surface excision sample program is used and the protocol is verified.
2. 60 samples are taken per lot whether the lot is 1 combo or the maximum of 5 combos.
3. The lot integrity remains intact. In other words the lot is not broken or split that would cause combos of the lot to be sent to different customers.
4. The test method for E.Coli O157:H7 is Bio Control Assurance GDS. No cultural confirmation is completed. This preventative test is acted on as if it were a confirmed positive.

Recall procedures are in place at each production facility such that in an emergency, all products that are produced can be traced as product codes and volumes shipped by the location shipped to. Each of our production businesses has an Emergency Response team made up of personnel identified according to the necessary disciplines needed for prompt action. Members of the team include Production, Sales, Technical Services, Public Affairs, Legal and Information Technology personnel.

Our plants that process livestock are access controlled, fenced and guarded. At all production plants, visitors are also restricted, except under certain strictly controlled circumstances. These procedures have been in place for some time, and we review the procedures on a regular basis.

Operations at our facilities are governed by applicable USDA/CFIA regulations, including all recent additions pertaining to exclusion of “Specified Risk Materials (SRMs)” from the human food supply. On January 12, 2004, USDA published new standards for Specified Risk Materials (SRMs) in the Federal Register.

All SRMs are segregated from Human food and discarded to INEDIBLE rendering:

- The spinal cords and tonsils are removed from all carcasses.
- The skull including brains, eyes and trigeminal ganglia are discarded from all cattle 30 months and older.
- In order to ensure the complete removal of the dorsal root ganglia, the vertebral column of cattle aged 30 months and older (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) will be removed during fabrication and discarded to INEDIBLE RENDERING.
- Carcasses are segregated according to age based on the guidelines presented in FSIS Notice 5-04 to ensure proper disposal of SRMs from cattle 30 months or older.
- 80 inches of small intestines including the distal ileum as measured from the ileocecal junction is discarded to rendering.
- No air injection stunning is used.

Cargill Meat Solutions is committed to the proper care of animals as regulated by the USDA Animal Welfare regulations. The following information is provided to you to demonstrate our commitment to Animal Welfare.

1. Cargill Meat Solutions has in place training programs specifically designed to address animal handling issues. The American Meat Institute training guidelines developed by Dr. Temple Grandin are the foundation of this program.
2. Industry experts have been used to design equipment and review the animal handling and slaughter process.
3. An outside audit company completes yearly audits. Also, Cargill Meat Solutions completes daily monitoring audits to ensure animal handling requirements are met.

Cargill Meat Solutions is committed to meeting all applicable regulations that pertain to

animal handling as well as the current AMI Good Management Practices for Animal Handling.

The Establishment numbers for the above plants include: USDA Establishments: 86E, Cargill Meat Solutions Friona, TX; 86H, Cargill Meat Solutions Plainview, TX; 86K, Cargill Meat Solutions Dodge City, KS; 86M, Cargill Meat Solutions Schuyler, NE; 86R, Cargill Meat Solutions Fort Morgan, CO, 9400, Cargill Regional Beef, Wyalusing, PA; 17690, Cargill Regional Beef Inc., Milwaukee, WI; Cargill Regional Beef, Fresno, CA Est. 354.

Canadian beef harvest plants located in High River, Alberta (93) and Guelph, Ontario (51) has similar and equivalent programs to those in the U.S. These locations meet or exceed the requirements of the Canadian Food Inspection Agency as well as USDA/FSIS export requirements.

Cargill Meat Solutions beef harvest plants are continuously striving to minimize pathogenic bacteria contamination through the implementation of proven new technology and advanced testing programs, while at the same time exploring new technologies as they come into existence.

Cargill Meat Solutions harvest plants believes our food safety program sets the standard for the industry, but at the same time, neither we, nor for that matter, anyone is able to guarantee pathogen free raw materials. Accordingly, we want to reiterate the importance of proper handling and cooking of all raw meat products by you and your customers.

Please contact me should you have any specific questions.

Sincerely,

A handwritten signature in black ink that reads "Scott Goltry". The signature is written in a cursive, flowing style.

Scott Goltry
Vice President, Cargill Meat Solutions Corporation
Technical Services and Food Safety-Beef