



May 25, 2010

To: Cargill Meat Solutions Customers

RE: Beef and Regional Beef HACCP Letter

Dear Valued Customer,

Thank you for requesting some general information regarding the food safety initiatives at Cargill Meat Solutions Corporation (herein after "Cargill") harvest establishments in the United States and Canada. The USDA Establishment numbers covered by this letter include:

- 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 - Milwaukee, WI
- 354, Cargill Regional Beef - Fresno, CA

Canadian beef harvest establishments have similar and equivalent programs to those in the U.S. These establishments meet or exceed the requirements of the Canadian Food Inspection Agency (CFIA) as well as USDA/FSIS export requirements:

- 93, Cargill Meat Solutions – High River, AB Canada
- 51, Cargill Regional Beef – Guelph, ON Canada

Cargill is committed to the safety and quality of our products. All Cargill beef harvest establishments are in compliance with all USDA and CFIA regulations and are operating under a fully implemented Hazard Analysis and Critical Control Points (HACCP) Plan, which meets all requirements set forth in 9 CFR 417 or Chapter 2, Section 5, CFIA Food Safety Enhancement Program Manual. Additionally, Cargill establishments have in place Sanitation Standard Operating Procedures (SSOPs) that meet all requirements of 9 CFR 416 or CFIA, Chapter 3 in the Manual of Procedures (MOP). Further, Cargill establishments have in place written programs for Good Hygiene Practices (GHPs), recall and traceability, pest control, food defense, and, where necessary, allergen control.

In connection with Federal Register Docket 00-022N dated October 7, 2002, USDA FSIS notice on *E. coli* O157:H7 prevalence, Cargill establishments completed reassessment of their HACCP plans. As noted in the October 7, 2002 FSIS notice, because recent research reports indicate 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 Slaughter HACCP plans. A subsequent *E. coli* O157:H7-related reassessment was completed on October 26, 2007 per Notice 65-07. Reassessments also occurred at our Canadian facilities to meet the requirements described in Chapter 4 of the MOP, Annex O.

As interventions, fed cattle beef slaughter establishments in the U.S. and Canada have installed Hide-on Carcass Wash, pre-evisceration acid rinse cabinets, post-evisceration acid rinse cabinets, and steam pasteurization cabinets. For Cargill Regional Beef, establishments have installed steam vacuums, an acid rinse cabinet, and steam pasteurization cabinets or hot water treatments. To eliminate or reduce *E. coli* O157:H7 to below detectable levels, Cargill has identified thermal pasteurization in the form of the validated steam pasteurization intervention or the hot water treatment as a Critical Control Point (CCP). CCP critical limits are monitored daily. Additionally, the CCP is validated by scientific research and internal use of Data-Pak time/temperature monitoring probes.

In addition, all beef establishments perform extensive microbiological tests on carcasses and other beef products that serve as verification that the intervention system is functioning as designed. Cargill's harvest establishments 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). Moreover, all establishments also do routine environmental sampling at a variety of points in the production system. Depending on the establishment, 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. Tests are monitored on an ongoing basis for trend analysis of establishments and products.

As a part of our continuing food safety efforts, Cargill 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 'Product Notification Document' is sent to the customer receiving the tested trim or ground beef (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 in place for beef trimmings destined for use in raw ground products as well as Hearts, Head Meat, Cheek Meat, Weasand Meat, PDCB, FTB and other raw ground beef components Cargill would like to outline certain key aspects of its *E. coli* verification-testing program:

- Trim lot integrity will always be kept intact. A lot will not be broken or split to cause combos of a lot to be sent to different customers.
- A robust N=60 surface excision sample program is used. 60 samples are taken per lot whether the lot is 1 combo or the maximum of 5 combos.
- Finely Textured Beef product group [including Finely Textured Beef (FTB) and product variations including Primal specific products (Round, Sirloin and Chuck), Breed specific products (Angus, Certified Angus Beef), and Grade specific products (Choice). This product is also known in the marketplace as Lean Finely Textured Beef (LFTB), Fat Reduced Beef (FRB) and Boneless Lean Beef Trimmings (BLBT)] sample program is in place where individual box sampling is performed for each lot and 375g are tested.
- Partially Defatted Chopped Beef (PDCB) and Beef Trimmings Finely Textured (BTFT) are also involved in sampling programs in which individual box sampling is performed for each lot and 375g are tested.
- BioControl Assurance GDS, a PCR based test method, is utilized for *E. coli* O157:H7 testing. No cultural confirmation is completed. A presumptive positive test is acted on as if it were a confirmed positive.
- Cargill has a third party verification program of its N=60 program. Under this program, raw ground beef components are ground, sampled and analyzed to verify the effectiveness of sampling technique. The verification program is conducted at a minimum of once quarterly with an increased frequency during high prevalence months (April through September). This program can be used to meet the FSIS best practice expectation that customers conduct on-going verification of its incoming product. If you would like more information on how to use this program to meet regulatory expectations for your operation, please contact us.

Cargill has a "Hot Day" (or "Event Day") program where, after a certain number of presumptive *E. coli* O157:H7 results on trim and/or ground beef have occurred in the same production day, an establishment will hold and evaluate previously negative tested products. During this evaluation, a determination is made on whether or not products that previously tested negative may be associated with the presumptive product. If product is associated, that product is held and disposed of as presumptive positive product.

Operations at our establishments are governed by applicable USDA/CFIA regulations, including all recent additions pertaining to exclusion of "Specified Risk Materials (SRMs)" from the human food supply. All Cargill establishments are in compliance with FSIS Notice 56-07, Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs) or CFIA MOP Chapter 4, Annex N. All SRMs are segregated from Human food and discarded to inedible rendering, incinerated or landfilled:

- The tonsils (US only) and spinal cords 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, incinerated or landfilled.
- Carcasses are segregated according to age based on the guidelines presented in FSIS Notice 5-04 or CFIA MOP Chapter 4, Annex N. to ensure proper disposal of SRMs from cattle 30 months or older.
- Eighty 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 is committed to meeting all applicable regulations that pertain to animal handling and the proper care of animals as regulated by the USDA Animal Welfare regulations, as well as the current American Meat Institute (AMI) Good Management Practices for Animal Handling. The following information is provided to you to demonstrate our commitment to Animal Welfare:

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

Recall procedures are in place at each production establishment 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.

Establishments are access controlled, fenced and guarded. At all production establishments, visitors are restricted, except under certain strictly controlled circumstances. Food defense procedures have been in place for some time, and Cargill reviews these procedures on a regular basis.

Cargill beef harvest establishments 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 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,



Angela L. Siemens, Ph.D.
Vice President Technical Services
Cargill Meat Solutions