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### Statement Concerning Beef Products Produced for Sale to Gurrantz

All products from Beef Packers Inc are produced under a United States Department of Agriculture Grant of Inspection for establishment number 354. Product is guaranteed on the date of shipment to be wholesome and not adulterated or misbranded.

Beef Packers Inc is committed to providing its customers and consumers with the most wholesome and highest quality beef products possible. To this effect, we have adopted policies and procedures that ensure that the highest standards are met.

#### Animal Handling, Non-Ambulatory Animals and Identification Policy

Beef Packers Inc is committed to the safe, humane treatment of all animals that are received at this facility. To this effect, Beef Packers Inc has incorporated the Humane Handling and Stunning guidelines set forth by AMI in developing our animal handling procedures. Every effort will be made to maintain the identity of each animal and to ensure its proper identification and disposition according to USDA Regulations.

Beef Packers Inc **does not accept delivery of non-ambulatory animals**. All non-ambulatory animals are condemned and disposed of in accordance with USDA FSIS Regulation 9CFR Part 309.13.

#### FDA ban on feeding of mammalian derived protein materials in ruminant animals and proper administration of veterinary drugs in cattle Certification Policy

Beef Packers Inc maintains signed affidavits from all parties presenting animals for slaughter certifying that "to the best of his/her knowledge, none of the livestock presented for slaughter at Beef Packers Inc are adulterated within the meaning of the Federal Food, Drug and Cosmetic Act (i.e. none of the cattle or other ruminants have been fed any feed containing protein derived from mammalian tissues, e.g. meat and bone meal, not in compliance with 21 CFR 589.2000 and that none of these animals presented for slaughter have illegal levels of drug residues)".

#### Bovine Spongiform Encephalopathy Specified Risk Materials USDA FSIS 9 CFR Part 310.22 [Docket No. 0251F]

On January 12, 2004, USDA published new standards for Specified Risk Materials (SRMs) in the Federal Register. All beef products produced by Beef Packers Inc for **Gurrantz** after January 12, 2004, do not contain SRMs, as defined by these new standards. In accordance with the USDA FSIS Interim Final Rules, Beef Packers Inc has reassessed its HACCP plan and has implemented several control measures and procedures to address the removal and disposal of Specified Risk Materials (SRMs) for Bovine Spongiform Encephalopathy (BSE).

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

#### Advanced Meat Recovery Systems

USDA FSIS 9CFR 318.24 [Docket No. 0381F]

No AMR product is used in ground beef produced at Beef Packers Inc.

#### Bovine Spongiform Encephalopathy (BSE) Baseline Testing

FSIS Notice [Docket No. 03-048N] USDA APHIS 9 CFR Part 71 [Docket No. 99-017-1]

As a Federally Inspected facility, we are required by law to cooperate with all USDA baseline testing programs. We have established a comprehensive product HOLD program to maintain the segregation of all tested product until final disposition.

#### Ban on the use of Air Injection Stunning Method

USDA FSIS 9CFR 313.15(b)(2)(ii) [Docket No. 03-0331F]

Beef Packers Inc does not utilize air injection stunning.

#### E. coli 0157:H7 Microbial Interventions

USDA FSIS 9 CFR Part 417 [Docket No. 00-022N]

Our Critical Control Point (CCP) is the hot water pasteurization cabinet and post evisceration lactic acid spray. This microbial intervention has been validated to **eliminate or reduce to below detectable level the occurrence of E. coli 0157:H7** on the carcasses.

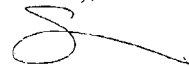
In addition to our validated CCP, we also employ several control measures including Sanitation Standard Operating Procedures (SSOP) and Good Manufacturing Practices (GMP) to insure that we produce a safe and wholesome product.

- 180°F water knife/equipment sanitizers are utilized.
- Positive airflow is utilized on the kill floor to prevent the circulation of airborne contaminants.
- Steam vacuums are utilized at several control points pre-evisceration, post-evisceration and in the boning room prior to fabrication.
- There is a pre-evisceration carcass wash cabinet that incorporates a lactic acid spray.
- There is an in-house inspector who visually examines each carcass for visible contamination. (CCP-I)
- All carcasses go through a wash cabinet, 170° hot water spray pasteurization cabinet and a final lactic acid spray prior to entry into the coolers. (Validated CCP-II)
- Once in the cooler, carcass spacing is maintained to ensure adequate air flow and expedite surface cooling.
- All carcasses are treated with an antimicrobial spray prior to fabrication.

Beef Packers Inc verifies the microbial interventions in the slaughter process by performing E. coli 0157:H7 and Salmonella testing utilizing AOAC official test methods. Our lab technicians have successfully completed quarterly American Proficiency Institute testing. In addition to our daily verification testing, Beef Packers Inc has successfully completed the USDA PATHOGEN REDUCTION ENFORCEMENT PROGRAM SALMONELLA PERFORMANCE STANDARDS for carcasses and for ground beef products.

I would be happy to discuss any questions or concerns regarding food safety programs and microbial interventions utilized during the beef slaughter and fabrication processes at Beef Packers Inc. Please do not hesitate to contact me.

Sincerely,



Shelly McCurry  
Food Safety Manager  
559-268-5586 ext 222