



January 11, 2011

Subject: Food Safety

This document is to serve as verification of our FSIS / USDA inspected HACCP plan and our Salmonella / Escherichia Coli 0157:H7 (pathogens) reduction Critical Control Points (CCP's). This verification validates that our CCP's eliminate or reduce pathogens below detectable levels. Our HACCP plan consists of our slaughter process and our fabrication (non-ground raw meat) process.

In the slaughter process, we feel that the potential for pathogens, is likely to occur. For this reason, we have three CCP's in place.

The first one is CCP K1, which is zero tolerance applied to fecal, ingesta and milk. To produce a product of the highest quality and ensuring food safety, we enforce a pre-government QC inspection and a post government QC inspection. Our post government inspection is our CCP K1, which is a visual check of a carcass every two hours prior to it entering our carcass wash during the slaughter production.

The second one is CCP K2, which is our lactic acid pasteurization intervention step. QC inspects the system every two hours to ensure that the proper PH levels are maintained and that the system is working properly during the slaughter production. Our microbiological testing and USDA's random testing, establishes that we consistently meet/exceed required standards for elimination of Pathogens, Coliforms and Aerobic Plate Counts.

The third one is CCP K3, which is zero tolerance applied to fecal and ingesta on head and cheek meat and trimmings. QC inspects approximately 10 lbs of each, (head, cheek and trimmings). This is performed in our offal room approximately once an hour during the slaughter production. **Note: We do not process any weasand meat.**

Prior to our carcasses entering the fabrication process, CCP F1 is performed by QC, which is zero tolerance applied to BB's, fecal, ingesta, milk and spinal cords. QC performs a visual check of a carcass every two hours during the fabrication process.

In the fabrication (non-ground raw meat) process, we feel that there is potential for possible pathogen growth if product temperatures exceed 44°F. Based on scientific data, pathogens cannot grow at temperatures of 44°F or below, therefore after the carcasses proceed thru our CCP K2, they are stored over night in our cooler which is set at 35°F. The following morning surface temperatures of the carcasses are monitored and recorded every hour. Our records review showed that the carcass temperatures range from 28 to 35°F. We have CCP F2 and F3 in place, which is we temp our products

every two hours during our fabrication production to ensure that they are 44°F or below. In addition, we have an in house policy where we temp every combo before it is shipped out.

We produce products labeled “Boneless Beef Produced Trimmings” as well as some (non-cryovac’ed) primals and sub-primals labeled (knuckles, chucks, ribeyes, tenders, etc.). These products are –or– maybe further processed into non-intact end products. The above-mentioned products are tested for E.coli o157:H7 when they are destined to companies for which we have no cooking / lethality confirmation on file confirming that they have a lethality step in their process. Those tested products do not change ownership until the customers receive a Certificate of Analysis. We maintain a detailed log of each loads destination and those that are tested. If for any reason the product were to fail the microbial testing, the product would remain in the control of VPP Group, LLC. until proper documentation is received confirming it had received a lethality treatment.

In addition, we reviewed all of our CCP’s, corrective action forms related there-to, and our microbial test results for the time period of January 2008 to present. This review resulted in negative findings of any new plant history that would warrant any additional concerns in regard to potential biological, chemical or physical hazards at this time.

This verification also confirms that we remain in compliance with the following:

Notice 56-07: BSE final rule.

FDA Title 21 Part 589.2000: Prohibited Feed Program.

Directive 6100.1 and 9CFR Part 309: Ante-Mortem Livestock Inspection / Non-ambulatory cattle.

Directive 29-09: Disposition of Non-Ambulatory Cattle

Directive 6900.2: Humane Handling and Slaughter of Livestock.

Directive 6100.2 and 9CFR Part 310: Post-Mortem Inspection / SRMs.

Directive 6100.4: SRMs.

9CFR Part 318: Drugs residue and AMR.

9CFR 313: Prohibition of certain stun guns.

Base upon this verification / review, we are very confident in our pathogen prevention steps and our BSE Surveillance Program, and that we are and will continue to produce a product of the highest quality and ensuring food safety.

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