Iowa Premium
Family Farm Raised • Black Angus

January 3, 2017

Dear Valued Customer,

Iowa Premium, LLC is USDA Est. #M8. The facility is located at 3337 L Avenue, Tama, IA 52339 and operating under the USDA-FSIS regulations to meet the requirements of the Federal Meat Inspection Act and the Food and Drug and Cosmetic Act. The company has developed and implemented a systematic food safety system, which utilizes regulatory guidelines, industry best practices, and validated scientific methods to ensure the safety and quality of its products. The continued use of USDA marks of inspection shows continued compliance with food safety regulations. Our food safety system includes written policies, procedures, and implementation activities established to meet the following regulations:

1. **Sanitation Standard Operating Procedures** (SSOPs) (9 CFR 416.11-17)
2. Sanitation Performance Standards (SPS) (9 CFR 416.1-6)
3. **Hazard Analysis and Critical Control Points** (HACCP) (9 CFR 417.1-8)
4. Testing of carcasses for *E. coli* Biotype 1 (9 CFR 310.25)
5. Testing of carcasses for Salmonella conducted by USDA (9 CRF 310.25)
6. Zero Tolerance for Fecal, Ingesta, or Milk contamination is a CCP for carcasses, head meat, cheek meat, and weasand meat (FSIS Directive 6420.2 of 3/31/04).
7. **Intervention Systems**: *E. coli* O157:H7 is a hazard reasonably likely to occur in raw beef products. We use validated interventions (organic acids and hot water wash) to control this pathogen. The hot water wash is a CCP. Only food grade organic acids are used (FSIS Directive 7120). The same concentration of organic acid is applied to carcasses, beef trimmings, variety meats harvested from heads and viscera intended for use as raw ground beef components. **Organic acid is also applied to cold intact whole muscle sub primal product intended for further processing and not intended for use as a raw ground beef component (primals, sub-primals, and trims) prior to packaging.**
8. **STEC:** Non-0157 Shiga Toxin-Producing *E. coli* (STEC) are hazards reasonably likely to occur in raw beef products. The interventions applied against E. coli O157:H7 are validated and effective against non-O157 STEC (*Kalchayanand, et. al., 2012: J. Food Protection. Evaluation of Commonly Used Antimicrobial Interventions for Fresh Beef Inoculated with Shiga Toxin-Producing Escherichia coli serotypes O26, O45, O103, O111, O121, O145, and O157:H7).*
9. **Verification Activities** We use an ongoing robust N60 sampling method to test every lot of raw ground beef components to verify that the control of *E. coli* O157:H7 achieves below detectable levels (FSIS Directive 10010.1, Rev. 4 of 8/20/2015, 10010.2 of 8/20/2015 and Federal Register Docket 00-022N of 10/7/02). Details of this testing program are available. During high prevalence season, we will follow an HEP procedure. We will conduct verification testing, Quarterly (October through March), and Monthly (April through September). Verification test data will be available for customer review upon request. **Whole muscle cuts and beef trimmings that are not tested are not intended for use as raw ground beef components.**
10. **High Event Period (HEP)**: The facility uses a HEP SOP as a decision making process for identification and disposition of products with a non - negative *E. coli* O157:H7 sample result.
11. **Pre-shipment Review**: We conduct a pre-shipment review as required by USDA-FSIS regulations to ensure that all CCPs requirements are met and the process is under control.
12. **Corrective Actions and Preventative Actions**: If a deviation occurs or a CCP is found to be ineffective, corrective and preventative actions are taken as required under 9 CFR 417.3.
13. **HACCP Reassessment**: We conduct a HACCP reassessment annually or if a change occurs which is reasonably likely to affect the safety of our products (9 CFR 417.4(a)(3)).

In addition, our food safety system is established to meet the following regulations:

14. **Official Establishment, Re-inspection and Preparation of Products** (9 CFR 318) and **Terminology, Adulteration, and Misbranding Standards** (9 CFR 301).
15. **National Residue Testing Program** (FSIS Directive 10,800.1, Revision 1 of 3/3/14).
16. **Bovine Spongiform Encephalitis (BSE)** and **Specified Risk Materials (SRM)** regulations (9CFR 310.22; FSIS Notice 4-04; FSIS Notice 7-04).
17. **Animal Proteins Prohibited in Ruminant Feed** (21 CFR 589.2000)**.**

18. **Ante-Mortem** (9 CFR 309) **and Post-Mortem** (9 CFR 310). Each animal slaughtered in our facility undergoes FSIS ante-mortem and postmortem inspection.
19. **Animal Welfare and the Humane Slaughter of Livestock** (9 CFR 313). In addition to annual third party audits, the facility follows animal welfare guidelines utilizing a robust systematic approach to humane animal handling through training and auditing following the guidelines published by USDA, NAMI and Dr. Temple Grandin. Audit reports are discussed with management for continuous improvement.
20. **Handling and Disposal of Condemned and Inedible Materials at Official Establishments** (9 CFR 314), and **Disposal of Diseased or Other Adulterated Carcasses and Parts** (9 CFR 311). All inedible and condemned materials are identified, denatured, and disposed by rendering or landfill. BSE/SRM materials from 30 months or older cattle are sent to landfill.
21. **Allergens** (FSIS Notice 29-13). There is no allergen received or processed in our facility.
22. **Food Defense** (FSIS Directive 5420.3 Revision 7 of 2/6/14). The program is implemented to prevent or restrict unauthorized access to products and premises.
23. Each cattle producer signs an affidavit to confirm that their cattle were born and raised in the USA. This is shown on packaging containers and the Bill of Lading as "Born, Raised, and Harvested" in the USA.
24. **Recall/Market Withdraw and Traceability** (FSIS Directive 8080.1 Revision 7). A recall program is established and we conduct mock recalls, at least twice annually. **Customer Notification**: We will promptly notify our valued customers in the event of a recall or market withdraw.
25. **Cold Chain Management**. Beef carcasses are chilled rapidly to control microbial activity. Cold carcasses are graded and fabricated under refrigeration, and the resulting beef product is packaged and shipped refrigerated or frozen to keep the level of *E. coli* 0157:H7 below detectable in raw beef products. Variety meats harvested from carcasses, heads, and viscera are added with dry ice and/or sent rapidly to the freezer. All shipments of raw boneless beef components for ground beef will be maintained under refrigeration during transit to arrive at temperature of 40° F or below.
26. **Microbial Limits in CFU/g** (Total Plate Count <10,000; Generic E. coli <10; Total Coliform <10): We recognize that our customers expect nothing less than wholesome, high quality, premium beef products. For this reason, we agree to use microbial limits as working targets, but not as specifications to disqualify Iowa Premium as an approved supplier.
27. **Export Verification (EV)**. An approved QSA program is established to comply with specific export country requirements described at the website: http://www.ams.usda.gov.
28. **External Audits**. We are fully committed to ensure that our raw boneless beef components are produced and distributed under validated HACCP and intervention systems, strict hygiene and sanitary conditions, and robust cold chain management to maintain low microbial limits. We are committed to customer audits and third party audits to demonstrate the safety and quality of our products. We will participate in a GFSI scheme or GMP/Food Safety 3rd party food safety and animal welfare audits.
29. **Business Continuity Plan**. The company has a contingency plan in case of natural disasters or equivalent crisis that renders the facility inoperable.

Thank you for your business. Please contact me if additional information is needed.

Sincerely,

Mikel L. Gager

Mikel L. Gager
Food Safety Manager
Email: mgager@iowapremium.com

Phone: 641-484-2220-2307