



January, 2016.

Page 1 of 5

Dear Client.-

Regarding the information you requested:

### **SRM Controls**

SuKarne TIF 105, 111, 120, 431 facilities have Reassess their HACCP and written prerequisite programs for control de SRM's according to the Notice 5607 of the FSIS. And all SuKarne plants apply the following to SRM Control and disposition.

SuKarne do not process Non-ambulatory bovine animals for human consumption, all cattle receive an ante-mortem inspection and enter the stunning box by their own feet.

All cattle is age verify by the dentition inspection, if the cattle is equal or more than 30 months the carcass is mark with a green plastic tag a label with a code number 30 indicating that the carcass is equal or more than 30 months so the carcass is segregated to a designated rail and carcass cold room.

The equipment utilize for the slaughter of Cattle equal or more than 30 months follow the SSOP procedures according to USDA regulations

SuKarne facilities remove, segregate, and properly dispose of all Specified Risk Materials (SRM's) at Slaughter and Fabrication.

SuKarne do not operated for purposes of stunning cattle any air injection stunning device. SuKarne facilities do not produce bone-in products from cattle determined to be equal to 30 months and older.

SuKarne S.A. de C.V. segregation protocols have been reviewed and approved by USDA and SENASICA as applicable.

SuKarne SA de CV has a Zero Tolerance policy with respect to the presence of SRM (Specified Risk Material) including but not limited to spinal cord and dura. Specific positions and Work Instructions are in place dedicated to the removal of SRM. SuKarne SA de CV SRM Control Program is fully incorporated into the Quality Management System and HACCP Plans.

And we comply with the specification requirements from clients in regards to the SRM control and disposition.

SuKarne SA de CV is committed to supplying products with the highest standards of food safety and quality.

### **E. coli O157:H7 and STEC Program**

The annual HACCP reassessment has determined that while *E. coli* O157:H7 (FSIS Notice 6507) and Non O157:H7 STEC may be a hazard likely to occur on incoming cattle it has been concluded that due to the effective implementation of the HACCP plan and Sanitary Standard Operating Procedures the hazard has been effectively controlled.

The Interventions implemented in SuKarne Facilities are as follow

Cattle Wash.- All cattle hides are wash to reduce the microbial load , and the operation is adjusted in their time according to the contamination observe , this way we minimized the risk of contamination during the carcass dressing procedures.

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### **Oficina de Representación en la Ciudad de México**

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Knives trimming. - All carcasses are visually inspected by experience employees to eliminate any possible contamination that could exist by knife trimming, so every carcass is inspected at least by several pair of eyes.

Carcass Steam Vacuuming. - All carcasses are subjected to a steam vacuuming operation, after knife trimming of the carcasses, to eliminated any possible contamination

Organic acid application. - All carcasses are subjected to an organic acid application that will reduce or eliminated pathogenic bacteria that might exist.

Cold Carcass Sanitizer. - After the carcasses have been cool, before entering the fabrication area all carcasses are sanitized with an organic acid application as a multiple hurdle approach and prevention of bacteria growth.

Additionally the following control measures are implemented at all SuKarne facilities

After stunning - esophageal plugging/clipping where required

Tying and bagging the bung

Line speeds appropriate to providing adequate time for operators to complete hygiene inspections and dressing of the carcass

2 knife sterilization between carcasses

Sanitizing hands and equipment between carcasses for high risk activities

Prevention of carcass to carcass cross contamination by spacing on lines and in chillers

Chilling and freezing regimes to control microbial growth

To verify the ongoing effectiveness of these interventions SuKarne conducts sampling and testing of Beef Trimmings for *E.coli* O157:H7 and Non O157:H7 STEC in accordance with FSIS Meat Directive 10010.3 of raw ground beef components (N60 Method) additionally to the testing we have a high event period program for the follow up of the results, Each lot consists of 4500 kg (10,000 lb.) or less, the product is sampled and tested for *E.coli* O157:H7 using approved methods.

All product is subject to a 'Test, Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and returned negative test results for *E.coli* O157:H7 can be released for shipment.

These samples are test in our Lab with the BAX DUPONT QUALICOM PCR SYSTEM and we send samples to an accredited outside lab for verification.

The trim is subject to other intervention before sampling, product is release after tested with negative results only.

SuKarne Slaughter plants comply with regulation 310.25 as is require to exporting plants by the Mexican Government

All trim products comply with the FSIS regulations, and with the Mexican regulations established for Export Plants.

Our process flow for subprimal deliver the product direct in to the packaging lines and do not involve the comingling of product inside a container

## Generic E coli

### *Sample collection.*

Samples are collected by sponging from three sites on the selected carcass.

The sites are the flank, brisket and rump.

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*Sampling frequency.* The sampling frequency is according to the volume of production 1 test per 300 carcasses

And all plants since do sampling by sponging opted for the Statistical process control option for results management

### **Pathogen reduction performance standards for Salmonella.**

SuKarne Slaughter plants comply with regulation 310.25 as is require to exporting plants by the Mexican Government

*The Sample collection.*

Samples are collected by sponging from three sites on the selected carcass.

The sites are the flank, brisket and rump

*Sampling frequency.* The sampling frequency is according to the volume of production 1 test per 300 carcasses

The Salmonella performance standard we use for our Cattle, is the one for Steers and Heifers with 82 (n) consecutive samples at a 1% Performance Standard or a Maximum number of positives to achieve the Standard (c) of 1

At this time we are in compliance with the salmonella performance standards, as we have not had any positive in our process this year.

### **Pest Control Program**

SuKarne plants have implemented in their facilities as a prerequisite program a Pest Control Program that is monitored daily and verified weekly.

The services are provided by an outside contractor, that is approve by the Government official Health Services as a License Pest Control Services Provider

As part of the pest control services is the assessment and implementation of measures to control and the installation of bait stations on the outside perimeter of the plant and mechanical rodent traps where applicable inside the plant, the program also includes the flying insect control devices.

All activities from the pest control contractor are monitored by plant personnel and evaluated

If there are any pest control activities detected an action plan is implemented and follow.

### **Cattle Purchasing Policies**

SuKarne has purchasing policies and certification of cattle suppliers so we receive at our feedlots the best quality cattle everyday

Our supplier go to an approval process where they have to comply with the Good Feedlot Management and Animal Welfare Practices as to provide signed affidavits that they comply with SuKarne requirements and confirm that their animals have not be fed any prohibited materials.



We have establish Animal welfare practices so our cattle is handle appropriately (handling and transport)

We also have created a profile for each animal (SuKarne's Individual Animal Control System so we can track where it came from and who sold it, to us.

In our Feedlot operations we have establish

Animal welfare practices so we maintain good health and weight in our herds.

We also have the SuKarne's Individual Animal Control System for disease control and management as for and weight management

And we have establish also a Chemical testing program of food rations, to prevent any deviation from the government regulations and standards

Our Feed lots have been certified as by the Mexican SENASICA FOOD SAFETY DIVISION with the certification of (Good Feedlot Management n Animal Welfare Practices)

Our Feed lots are also being certified as Feed lots free of Beta agonist products like Clembuterol.

### **Traceability/Recall Plan**

SuKarne plants have implemented a recall plant cattle supplied to SuKarne SA de CV are sourced from within Mexico only and are assessed as fit for human consumption by passing both an ante-mortem and postmortem

Inspection conducted by Mexican Government officials. Carcasses are identified at each stage through the process using a sequentially numbered ticket that remains with the carcass until boning.

Carcasses are trimmed according to the Mexican Standard Carcass Trim requirements. After carcasses are boned, sliced and packaged on-site they are labeled according to Mexican language and as require by the FSIS labeling of beef product categories to identify the product type. The carton label includes the date, time and Lot of packing which is used for traceability purposes.

The recall program is tested as Mock Recall is exercise twice a year in each plant.

### **Validation and Verification**

SuKarne plants have been operating under a Pathogen Reduction Hazard Analysis and Critical Control Points (HACCP) System. We have implemented Sanitation Standard Operating Procedures and the generic E coli testing performance criteria as requested by the FSIS 9CFR part 416.11 and 416.17 and 310 .25 and the Mexican NOM-008-ZOO - 1994 and it's Modification in February 1999, and NOM -009-ZOO-1996 and it's modification in November 1996

SuKarne plants in accordance to FSIS Notice 44-02 regarding E coli O157:H7, have reassessed their HACCP program and considered E coli O157:H7 a Hazard reasonably likely to occur, we established a number of validated CCP'S in our processes.

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SuKarne Quality Management System and HACCP Plan have been audited and approved by the Mexican SENASICA Inspection Service.

SuKarne SA de CV is committed to supplying products with the highest standards of food safety and quality.

Yours sincerely,

A large, stylized handwritten signature in blue ink, which appears to read "Isidoro Uruga Ramirez", is written over the "Yours sincerely," text.

Ing. Isidoro Uruga Ramirez  
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