

GREATER OMAHA
PROVIDING THE HIGHEST QUALITY BEEF IN THE WORLD

Dear Valued Customer

January 2, 2013

Greater Omaha Packing Co., Inc. operates one of the newest beef processing facilities in the country. Built in 2001, our harvesting plant (Establishment 960) utilizes the newest and best technologies available within the industry to remove bacteria. We employ a multi-hurdle concept with several separate processes, each of which is a validated pathogen intervention procedure. These steps include controlled atmosphere, steam vacuums, hot water pasteurization cabinet and acid spray system cabinets. The industry views each of these methods as viable steps. Used in multiple hurdle configurations, these steps have been proven to be extremely effective. Greater Omaha is dedicated to producing the safest and most wholesome beef products available in the industry today. Both Establishments meet all USDA requirements for the production, sale, and distribution of meat products. Compliance of regulatory programs is not restricted to the programs and procedures listed below:

1. HACCP Systems and SSOP Programs in accordance with (9 CFR, Part 417, § 417.1- 417.8 and 416, § 416.11 – 416.17).
2. Documented annual HACCP reassessments in accordance with (9 CFR, Part 417, § 417.4 (a) (3). This annual documentation takes place in January each year and the reassessment includes *E. coli* O157:H7 and pSTEC.
3. Testing of carcasses in Establishment No. 960 for *E. coli* Biotype I in accordance with (9 CFR, Part 310, § 310.25).
4. Plant experience showing evidence of process control meeting the Salmonella Performance Standards in accordance with (9 CFR, Part 310, § 310.25).
5. Establishment No. 960 harvests cattle that have been fed rations that do not contain prohibited mammalian (i.e., ruminant meat and bone meal) per the attestation of the owner and defined by FDA in accordance with (21 CFR 589.2000).
6. Establishment No. 960 complies with the requirements for the disposition of non-ambulatory disabled cattle in accordance with (9 CFR, Part 309, § 309.3 & § 309.13). All cattle have passed USDA-FSIS ante-mortem and post- mortem inspection.
7. Establishment 960 participates in the FSIS National Residue Program for Cattle. Procedures are in place for carcasses to be sampled and screened for detection levels of antibiotics and residues by 3rd party laboratories. For additional information refer to FSIS National Residue Program for Cattle on www.usda.gov or Federal Register Notice entitled "Residue Control in HACCP Environment" (70 FR 70809).



GREATER OMAHA PACKING CO., INC.

Proudly featuring both Certified Hereford Beef and Certified Angus Beef

P.O. Box 7566 • Omaha, Nebraska 68107

Slaughter (402) 731-3480 Fax: (402) 731-7542

Fabrication (402) 731-1700 (800) 747-5400 Fax: (402) 731-8020





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8. Greater Omaha Packing Co., Inc. takes great pride in all programs at our facilities. Our systematic approach to humane handling is one of our top priorities. All animals are handled with the standards set forth in the American Meat Institute Foundation (AMIF) Good Manufacturing Practices (GMP's) for Animal Handling and Stunning and in accordance with (9 CFR, Part 313 & 69 CFR, 54625). Greater Omaha does not use air-injected stunning devices in accordance with (9CFR, Part 313, §313.15). Yearly third party audits are conducted and several members of Greater Omaha's staff have been certified at the AMI Animal Handling Workshops.
9. Greater Omaha Packing Co., Inc. removes, segregates and properly disposes of skulls including mandibles (jaws), brains, eyes, tonsils, thymus, spleens, intestines and spinal cords of carcasses of all ages in accordance with FSIS Directive 6100.4 and (9CFR, Part 310 § 310.22). Carcasses and Variety Meats deemed to be 30 months and older are segregated and labeled with specific codes or disposed into inedible rendering. The vertebral column of carcasses deemed 30 months and older are also identified and segregated when shipped.
10. Establishment No. 960 has a validated hot water pasteurization intervention step using specific limits as a Critical Control Point (CCP) in its HACCP System to eliminate or reduce *E. coli* O157:H7 below detectable levels.
11. USDA has recognized and Greater Omaha agrees that a system in control for *E. coli* O157:H7 is in control for pSTEC.
12. Establishment No. 960 has in place a Critical Control Point (CCP) for zero tolerance visual inspection on carcasses, head meat, cheek meat and weasand meat.
13. Greater Omaha Packing Co., Inc.'s products are verified as "Product of the USA."
14. Establishments No. 960 and No. 960A products are inspected using an On-line AQL procedure, which includes foreign material.
15. Establishment No. 960 Variety Meat products known to be intended for raw ground use are tested for *E. coli* O157:H7 using a robust N60 excision sampling program and customers receive a Certificate of Analysis (COA) upon request. The sample receive date on the COA is the same as the production date for these products.
16. Establishments No. 960 and No. 960A use an antimicrobial treatment of Lactic Acid with acceptable concentration on carcasses and variety meat products prior to processing.
17. Establishment No. 960A applies an antimicrobial treatment of Acidified Sodium Chlorite (ASC) to its conveyor belts and trimmings with acceptable concentration levels.
18. Establishment No. 960A has a validated Critical Control Point (CCP) that continuously monitors room temperature sufficient to maintain the control of outgrowth.



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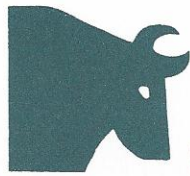
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19. Establishment No. 960A has a Critical Control Point (CCP) of Product Testing for *E. coli* O157:H7. Greater Omaha utilizes a robust N60 excision sampling program or a validated single combo robust N60 equivalent sampling program for products known to be intended for raw ground use. These samples are tested for *E. coli* O157:H7 and customers receive a Certificate of Analysis (COA) upon request. Tested products are under a test and control program until negative results are known. Results are generated using an AOAC approved Multiplex PCR System for *E. coli* O157:H7. Quarterly verification testing is a part of our program and also is available upon request. Testing is performed by a 3rd party laboratory and a certificate of accreditation is available upon request.
20. On days when a presumptive positive event occurs, an evaluation is conducted to verify that Greater Omaha is effectively controlling *E. Coli* O157:H7 through its Critical Control Point (CCP) of Product Testing for *E. Coli* O157:H7. A review is conducted to verify that all HACCP, SSOP and Pre-requisite programs are being followed according to program procedures. All positive events undergo an investigation and are properly handled according to FSIS Directive 10,010.1.
21. Establishments No. 960 and No. 960A can employ traceability practices through the process and has a recall program in place that notifies customers in the event of a recall.
22. Establishments No. 960 and No. 960A is audited on an annual basis by an independent 3rd party auditor. Audits encompass regulatory compliance HACCP, SSOP, Prerequisite Programs, Animal Welfare, SRM's, *E. coli* O157:H7 and Good Manufacturing Practices. A summary of audit scores are available upon request.
23. Establishments No. 960 and No. 960A is a USDA facility and is not required to register under FDA Bio-Terrorism regulation. Our establishments comply with USDA Food Security and Defense requirements.
24. Advance Meat Recovery (AMR) is not utilized in our process and products are not subjected to hyper-chlorinated water.

Please contact me if you should have any further questions.

Respectfully yours,

Angel Besta
Technical Resources Manager
Greater Omaha Packing Co., Inc.
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Trade Secret – Confidential Commercial Information

This document is exempt from disclosure pursuant to the Freedom of Information Act 5 U.S.C. § 552(b)(4).



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