



10/12/2011

Dear Valued Customer,

Edible beef products from XL Foods Inc., Lakeside Packers EST 38 meet all Canadian and US requirements for the production, sale and distribution of meat products. Such requirements include, but are not restricted to the categories listed below.

**HACCP / Pathogen Reduction Regulation Compliance**

- Testing of carcasses for *E. coli* Biotype I (MOP CH 11, USA, § T.2.1).
- Prerequisite Programs
- HACCP Systems
- Salmonella testing in accordance with MOP CH 11, USA, Annex U

**E. coli O157:H7 Reassessment and Compliance**

Lakeside Packers completed a reassessment examining *E. coli* O157:H7 controls associated with the integrated Food Safety Assessment [HACCP and Prerequisite Programs] as required by CFIA per Annex O, Measures to Control *E. coli* O157:H7. Completion of annual reassessment of HACCP plans is performed in accordance with the FSEP Manual effective January of each calendar year. This reassessment included review and verification of adequacy of the HACCP plans in addressing *E. coli* O157:H7.

**Interventions**

Lakeside Packers employs a validated multiple hurdle process within the beef slaughter system to address Enteric Pathogens, specifically *E. coli* O157:H7. In addition to our microbiological intervention Critical Control Points (listed in HACCP Section below) the following practices are utilized in our beef slaughter operation.

- *Steam Vacuums* – are located strategically throughout the slaughter floor and are used on pattern mark areas.
- *Pre-Evisceration Cabinet System (PECS)* – eligible beef carcasses are treated with an approved antimicrobial.
- *Anti microbial sprays*
  - Hot carcasses post intervention are treated with an anti microbial spray of acidified sodium chlorite (Sanova™).
  - During chilling, carcasses are spray chilled with an antimicrobial solution of peroxyacids.
  - Carcasses are also treated with an anti microbial spray of acidified sodium chlorite (Sanova™) after chilling.
  - Heads are treated with an organic acid immediately after the head wash, post CFIA Inspection.
- *Thermal Pasteurization Systems* – Carcasses are subjected to a validated thermal pasteurization intervention, either hot water pasteurization or steam pasteurization.

**Verification Testing for E. coli O157:H7**

- Carcasses – Daily verification testing for *E. coli* O157:H7 is conducted at Lakeside Packers.
- Trim & Variety Meats – Quarterly verification testing for *E. coli* O157:H7 is conducted at Lakeside Packers.

**Beef Materials Destined For Grinding**

- Bulk pack trim (combo) is N60 tested per customer order with an individualized Certificate of Analysis (COA) to that specific product and order provided to the direct purchase customer.
- Boxed product known to be intended for raw ground use, i.e., beef trimmings from carcasses, head & cheek meat, hearts, hanging tenders and weasand meats are known to be intended for raw ground use and is therefore N60 tested and this is identified by the "T" on the label within the product code on the individual boxes.
- Each combo bin or pallet of boxed trim (identified as described above) is "N60" tested and thus considered a lot.
- Ground Beef from Lakeside Packers - All ground beef produced by Lakeside Packers is derived from trimmings tested negative for *E. coli* O157:H7 under the N60 [or equivalent] program. A '*Tested Negative*' statement is printed on the Bill of Lading for each order of ground beef and serves as notification to customers that the ground beef purchased is produced from negative tested raw beef components.

### Investigation and Event Day Programs

- Lakeside Packers utilizes a formal risk assessment program that evaluates specific investigatory findings from the 'on-site' investigation immediately following an 'Event Day' incident. 'Event Day's' are triggered by statistically determined signals based on the daily *E. coli* O157:H7 incident rate.

### Lakeside Packers Ground Beef

- In accordance with the intended use described in the plants' Raw Not Ground HACCP plans (includes beef trimmings from carcasses, head & cheek meat, hearts, hanging tenders and weasand meat), all trimming type materials known to be destined for raw ground use are subjected to N60 statistically based sampling that ensures a 95% confidence level for detection of *E. coli* O157:H7.
- All ground beef (coarse and fine) is derived from N60 beef raw materials, tested and found negative for *E. coli* O157:H7.
- External sources of raw material must meet or exceed Lakeside Packers' requirements for *E. coli* O157:H7 and provide a Certificate of Analysis (COA) for each lot.

### Laboratory Verification Testing

- Lab methods are validated and meet appropriate criteria ( $\geq 98\%$  Sensitivity and  $\geq 90\%$  Specificity).
- Verification of *E. coli* O157:H7 lab methods are routinely performed at the Approved Laboratory in conjunction with the CFIA.

### HACCP

Critical Control Points for the following categories are in place and in effect at present include:

#### Slaughter and Raw Not Ground – Variety Meats

- Validated Intervention (Thermal or Equivalent) to address *E. coli* O157:H7
- Chilling to prevent microbial outgrowth.
- Zero Tolerance for feces, ingesta and milk
- Disposition for *E. coli* O157:H7 positive product.

#### Raw Not Ground – Trim and Subprimals

- Disposition for *E. coli* O157:H7 positive product.

A CCP is "A point, step, or procedure in a food process at which control can be applied and, as a result, a food safety hazard can be prevented, eliminated, or reduced to acceptable levels". It should be clearly understood that these CCP's are in place to control, eliminate or reduce *E. coli* O157:H7 to an undetectable level.

### 3<sup>rd</sup> Party Verification

Lakeside Packers is audited on an annual basis by an independent 3<sup>rd</sup> party auditor. That audit encompasses regulatory compliance (HACCP, Prerequisite Programs, etc.), *E. coli* O157:H7 and good manufacturing practices. A summary of audit scores are available upon request.

### Customer Notification

Lakeside Packers has a recall prerequisite program / plan on file that includes notification to affected customers of any product that may be adulterated or misbranded.

### Humane Handling

XL Lakeside Packers complies with all applicable USDA / FSIS requirements including humane handling & slaughter of the live animals (9 CFR 313) and does not utilize "downer" cattle for processing (9 CFA Part 309, 310, 318 et al). These are sent direct to appropriate disposal services meeting the USDA / FSIS Final Rule Notice 56-07, Directive 6100.1, Directive 6100.4 requirements. Non-ambulatory cattle are handled appropriately and in accordance with all regulations.

### SRM Controls

XL Foods Inc., Lakeside Packers, EST 38 beef operation and products are in full compliance with the Canadian Food Inspection Agency [CFIA] approved segregation procedures for animals aged 30-months and older<sup>1</sup>.

All product derived from youthful cattle (<30 months of age as determined by dentition) is labeled with a "C" code precursor. Product, if derived from OTM (30 months of age or over) cattle, is labeled with a "Q" or "W" code precursor and a "triangle 3". Variety meats derived from cattle under 30 months of age are identified by a "CV" code precursor. Variety meats derived from cattle 30 months of age and older are identified by a "CY" code precursor.

This letter certifies that meat products produced at XL Foods Inc., Lakeside Packers:

<sup>1</sup> CFIA [Canadian Food Inspection Agency] Meat Hygiene Manual of Procedures Chapter 4 Annex N.

● Page 3

- Are derived from animals which were not stunned with devices that inject compressed air into the cranial cavity, or with a pithing process involving laceration [after stunning] of the animal's central nervous system tissue by means of an elongated rod-shaped instrument that is introduced into the animal's cranial cavity.
- Do not contain specified risk materials including skull, brain, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, palatine tonsils and vertebral column<sup>2</sup> (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) from animals aged 30 months of age and older, and the small intestine from bovine animals of all ages.
- Do not contain mechanically separated meat from the skull and vertebral column of animals aged 30 months and older.

In 1997, the CFIA banned the use of "prohibited mammalian protein" in cattle finishing rations (i.e., ruminant meat & bone meal) for ruminant animals. The CFIA ban was implemented to prevent the amplification of Bovine Spongiform Encephalopathy (BSE) into the cattle herd.

In support of this effort, all direct suppliers of cattle are required to certify to XL Foods Inc., Lakeside Packers their compliance to the ruminant feeding ban for "prohibited mammalian protein" (ruminant meat & bone meal). This requirement applies to the owner/ agent of cattle that are slaughtered at XL Foods Inc., Lakeside Packers. Cattle feeders are required to keep invoices and labeling for all feed they receive that contains animal protein products, whether or not the animal protein is prohibited.

All XL Foods Inc., Lakeside Packers cattle suppliers sign a Prohibited Feed/ Antibiotic Affidavit annually. Adherence to the XL Foods Inc., Lakeside Packers Prohibited Feed / Antibiotic Affidavit Program is monitored at least once per year.

**General**

Last, Lakeside Packers is a federal establishment and operates under the CFIA regulatory FSEP and Mandatory HACCP requirements. By applying the Mark of Inspection, we are obligated to adhere to all applicable requirements contained therein.

Please send questions to your respective sales representative.

Respectfully submitted,  
Jack Wolf,  
Complex Plant Manager

---

<sup>2</sup> The only product containing vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae and the wings of the sacrum), from animals 30 months of age or older that is shipped from these establishments are carcass sides or quarters. Carcasses derived from animals 30 months of age or older are clearly marked and described as such on the Bill of Lading (BOL) and Manifest.