



January 15th, 2022

HACCP LETTER OF ASSURANCE

HACCP PLAN ASSESSMENT (COMPLIANCE TO FSIS DIRECTIVE 10001.1)

Nuevo Carnic, S.A, Establishment No. 5, undertakes re-assessments of the HACCP system on a continuing basis in accordance with the terms that includes an annual re- assessment in compliance with the requirements set down by FSIS within US federal Register Notice 9 CFR Part 417 and Law N° 291 of Animal Health of IPSA, which states as mandatory the application of a HACCP Plan in all Meat Exporting Establishments.

The effectiveness of critical control points and other control measures within the HACCP reassessment are addressed to assure:

- The Meat Inspection Services workforce of the Plant conduct an Ante-mortem check on all cattle prior to slaughter.
- A separate pen is provided to isolate suspect and sick or injured animals.
- The prevention of primary and secondary contamination on carcasses through best practice procedures in the presentation of cattle for slaughter and in the dressing of beef carcasses;
- The inspection of all carcasses to detect and remove any zero tolerance defect on carcasses prior to leaving the slaughter floor;
- The elimination of potential pathogen growth on carcasses through validated refrigeration practices.
- Our Plant Nuevo Carnic, S.A is operating with a validated HACCP Plan. In our plant we have four Critical Control Points (CCP) that are in four separate steps in the process:
 - CCP 1: During step of zero monitoring visible tolerance of ingestion, fecal material, and milk in carcasses.
 - CCP 2: During step of spraying to all carcasses with 2 percent to 5 percent solution of lactic acid.
 - CCP 3: During step of chilling the carcasses within chillers.
 - CCP 4: During step of metals detector.



The current microbiological controls and verification activities are described below:

- Washing animals pre slaughter with potable and high pressure water, to remove solid fecal material.
- Occlusion of the esophagus with a plastic plug prior to hoisting into the dressing position and further sealing by rodding and attaching a plastic clip.
- A dual knife system is used on all tasks prior to hide removal.
- The bung is sealed with a plastic bag and elastrator ring to prevent spillage.
- The use of a ball tipped blade on the brisket saw to eliminated puncturing of the paunch.
- The continuous sterilization of the evisceration track with 180 ° F water.
- Trimming of any contamination.
- Individual inspection of each of the carcass removing any visible contamination.
- Meat Hygiene Assessment is made of dressed carcasses with zero tolerance criteria of fecal material, ingest and milk with attendant corrective and preventive actions as required to reduce, eliminate or control *Generic E. coli*, *E. coli O15 7:H7* and *E. coli Non O15 7 STEC*. The efficacy of these interventions is verified by microbiological testing.
- The establishment has in place a microbial intervention which consist of an organic acid spray system, which sprays 100 % of the carcasses in the slaughter floor. The organic acid used is Lactic acid (2 to 5 %), as recommended in the FSIS Directive 7120.1 - Safe and Suitable Ingredients used in the Production of Meat, Poultry and Egg Products.
- Official testing by the IPSA, Institute of Protection and Agricultural Health includes testing of carcasses for *Salmonella spp.*, *Generic E. coli* and test of verification for *E. coli O15 7:H7* and *E. coli Non O157 STEC*.
- A metal detector equipment is installed. Everyday a test bars will pass through the metal detector, with intervals of 30 minutes using ferrous particles, non-ferrous material and stainless steel. This process is monitored by the HACCP supervisor and insure that the metal detector detects the test bars. It is monitored before the first and last box.

E. COLI O157:H7 ROUTING SAMPLING PROTOCOL

- **Production Lot for this procedure:** a production lot is a sub-lot derived from beef processed on a single day.
- The sub-lot is defined as 10,500 pounds of bovine products that are considered to be raw ground beef components as defined in the Protocol for Routine Sampling and Verification of *E. coli O157: H7* and *E. coli NON O157 STECs* in Meat Products from the Republic of Nicaragua.
- The sub-lots are equivalent to no more than 175 boxes of 60 pounds each, produced on a specific production date. The production sub-lots are identified with letters of the alphabet as follows; sub-lot A, sub-lot B, sub-lot C etc. depending on the number of sub-lots produced on that date.



- The Meat Inspection Services of the Nicaragua Institute of Protection and Agricultural Health will perform tests to verify the presence of E. coli O157:H7 and E. coli Non O157 STEC, on each production sub-lot destined to be ground in the USA.

ROUTINARY SAMPLING

- The establishment 's officials will run test for the detection of the E. coli O157:H7 and E. coli Non O157 STEC using N- 60 procedures and supervised by IPSA inspectors who verify the daily results reported.
- The samples are analyzed in an approved laboratory assigned by the Nicaragua Institute of Protection and Agricultural (IPSA), and all the results will be reported directly to the Meat Inspection Services of IPSA.
- The sub-lots that are being sampled will be retained and released until the results are obtained and are negative for the presence of E. coli O157:H7 and E. coli Non O157 STEC.
- Presumptive Positive Sample: A sample is a presumptive positive when the analytical steps for microbial analysis indicate the strong possibility of E. coli O157:H7 and/ or E. coli Non O157 STEC presence, but additional analysis are need to confirm the presence or absence of the organisms and/ or condemned by the Official Meat Inspection Service.
- The E. coli O157:H7 and E. coli Non O157 STEC sample size is 375 g. according to PCR Method that is representative of the entire sample. The test used is the Genetic Detection System (GDS MPX Top 7 STEC from BIOCONTROL System for a quick result and the MLG 5B.01 for detection, isolation and identification Method for E. coli O157:H7 and E. coli non O157 STEC. All methods are approved by FSIS/ USDA). Confirmation test (MLG 5.04) should immediately be performed at the Official IPSA Laboratory. The production sub-lot would be kept under the government (IPSA) control until the results of the confirmation test are received.
- In case of a positive E. coli O157:H7 and/ or E. coli Non O157 STEC sample, the official inspectors from the Meat Inspection Services (IPSA) would perform an intensified sampling for the following consecutive 16 production days following the procedure describe in the FSIS Directive 10010.1. The frequency of the sampling would be double that described for routine sampling.
- In the remote case of another lot with a confirmed positive, the Meat Inspection Services (IPSA) will issue a report of non-compliance to the affected establishment. If the confirmation test is negative, then the production sub-lot would be released to the market.
- The production sub-lots with confirmed positives for E. coli O157:H7 and/ or E. coli Non O157 STEC will be under the supervision of the Nicaraguan Meat Inspection Services and will eliminate by condemnation or rendering.



As well as the above items mentioned the following procedures are observed.

- Establishment Standard Operating Procedures and work Instruction for control of sanitation and hygiene in compliance with the requirements set down by FSIS within US federal Register Notice 9 CFR Part 416
- Microbiological control programs for personal hygiene, equipment and contact surfaces and pre-shipment review procedures.

CONTROL OF SRM'S (COMPLIANCE TO FSIS DIRECTIVE 6100.4)

- Since 2004, Nuevo Carnic, S.A., included in the process the procedure to remove, segregate and dispose the SRM's, to assure that all the products exported to the United States are free of SRM's and safe for human consumption.
- Non ambulatory animals are not permitted to enter the slaughter floor. These animals are humanely slaughtered on site and brain samples are collected by the official veterinary to analyze for BSE. These animals are incinerated.
- All the ambulatory animals are slaughtered with non-penetrative pneumatic stunner which leaves the brain intact to prevent a contamination of brain SRM's to the rest of the carcass.
- Carcasses that are processed as older than 30 months of age, the Spinal cord and tonsils are completely removed. The rest of SRM's are sent to other process floor where they are processed for other markets different from United States, or dispose and sent to incinerator. The tonsils and the distal part of the ileum of all animals are removed and sent to the incinerator.
- Nuevo Carnic, S.A., has taken all measure to assure that there is NOT cross contamination of SRM's with the carcasses.
- Any animal with BSE symptoms is excluded for slaughter, condemned and incinerated. Also, IPSA put in place a testing program for BSE detection.
- Nicaraguan law (Administrative Resolution 059 – 2016) prohibit the feeding of the meat bone meal (MBM) to any ruminant animal.
- All animals are handled and slaughtered in accordance with Nicaragua Animal Welfare standards, which include “ANTE” and “POST MORTEM” inspection.

HORMONES POLICY

The Competent Authority of the Meat Inspection System of Nicaragua (IPSA), monitors compliance with the safety criteria regarding chemical residues caused by hormones in beef. Especially those prohibited for use in animals intended for human consumption.

IPSA, put in place a robust sampling program to detect residues of Veterinary Drugs and Related Products listed on the Central American Technical Regulations (RTCA 65.05.51: 18).



Any meat product that shows results above the established tolerance, are condemned by the Competent Authority and prohibited its commercialization for human consumption.

FOOD DEFENSE AND FOOD FRAUD MITIGATION

In the case of Food Defense, a diagnosis has been made, in compliance with the requirements of the FSSC 22000 Scheme, through a multidisciplinary team, analyzing possible risks through CARVER methodologies, which is established in matrix 8-MT-011 FOOD DEFENSE RISK ASSESSMENT. The controls are carried out in the format 8-FO-080 CHECK LIST DEFENSE PRODUCT.

Through the implementation of this prerequisite it is guaranteed:

- Identify the steps that can be taken to minimize the risk that the products made in our Establishment will be contaminated intentionally or improperly.
- Maintain a safe workplace for employees and safe products for our customers
- Protect the company against the threat of sabotage.

To assess vulnerability against food fraud, our Company has carried out a diagnosis, in compliance with the requirements of the FSSC 22000 Scheme, through a multidisciplinary team, analyzing possible vulnerabilities through the SSAFE methodology, which is established in matrix 8-MT-012 EVALUATION OF VULNERABILITY AGAINST FOOD FRAUD. The controls are carried out in the format 8-FO-098 DAILY REPORT OF THE TENDERIZED.

Through the implementation of this prerequisite it is guaranteed:

- An adulterated product is not made
- The authenticity of all the raw materials received and the products made in our Company throughout the production process.
- Brand protection

FEED COMPOSITION/ GMO IN THE FEED

Animals of bovine origin are reared, reared extensively and in the open air (free range) and these animals are fed with natural grass. No Genetically Modified Organisms (GMO) are present in the feed of livestock.

CERTIFICATION

We approved in the past audit of October 08th, 2021 by the NSF Company, an AMI Cattle and Calves Slaughter Audit, Beef E. coli O157:H7 Addendum and BSE Firewalls and SRM Assessment Addendum (Third Party Audit) and Cross Species.

We have been certified FSSC 22000 by LL-C (Certification) from May 21st 2020 to June 26th 2022.



Also we have been audited and approved (enlisted) by the FSIS/ USDA.

RECALL

We state that our Plant (Nuevo Carnic, S.A) has effective recall/ withdrawal capabilities which is included in our HACCP Plan.

CONCLUSION

For all the aforementioned, we attest that we comply with all the health, quality and safety requirements, to market our meat products or any type of consumer, guaranteeing their consumption without any risk.

Yours sincerely,

Dr. Ángel Ortiz M.
Food Safety Director

