

STATEMENT OF COMPLIANCE (HACCP- PREREQUISITES LETTER)

APROVALLS AND CERTIFICATIONS

The establishment number 4238, a Marfrig Global Foods S.A. plant, is approved by the US Food Safety and Inspection Service (FSIS-USDA) to produce and export frozen beef. We certify that our programs and operations, as well as the incoming cattle, comply with all applicable regulations.

The facility number 4238 also comply with Official Brazilian SRM - Specific Risk Materials Rules, and 9 CFR nº 310.22. Furthermore, Brazil is listed at the World Organization for Animal Health (OIE) as having negligible risk for Bovine Spongiform Encephalopathy (BSE), Chapter 2.3.13 of Terrestrial Code. Therefore, the HACCP plan complies with FSIS Notice 31st, 2007, of SRM final rule, regarding the prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Livestock.

The pathogen reduction component mandates a program of bacteriological testing of bovine carcasses for the presence of Escherichia coli and Salmonella spp., In order to verify the effectiveness of process control for hygiene and sanitation under HACCP plan. Establishment number 4238 is Certified BRC Issue 8 achieving Grade AA, for the following activities: cattle slaughtering, deboning, frozen and chilled beef, with or without bones.

AUDITS

The HACCP plan and the prerequisite programs (SSOP, SOP, and GMP) has been audited by the Brazilian Ministry of Livestock on 07/27/2021 to 07/29/2021 and was accepted as satisfactory.

PATHOGEN REDUCTION PROGRAM

All batches of products to the USA are sampled (N = 60) for Escherichia coli Verotoxigenic (E. coli STEC) serogroups O157: H7, 026, 045, 0103, 0111, 0121 and 0145 and Salmonella spp. It must be collected at least one sample/batch, in order to cover all production lines. Samples must be collected from the product surface (more exposed to contamination parts).

This sample must be collected from 5 packages: the first, the last and three random samples within each batch. Each sample should be of a size 3 cm in width, 8 cm length and 0.5 cm thick, weighing about 5 to 10 grams, a total of 60 pieces, with a final weight of 325 grams minimum.

The analysis for E. coli STEC consists of three steps:

- **first stage** - consists of "PCR Screening Test" to detect the potentially positive result;
 - **second stage** - is the isolation and reaction with antigen to detect presumably positive;
 - **third stage** - is to determine genetic or serologic for the detection of confirmed positive serogroup.
- Since the start of production to US market, Salmonella has not been detected in any randomly selected carcasses sampled.

- In relation to E. coli O157:H7 it has not been detected in any randomly selected carcasses sampled.

The plant also has an environmental sampling for Listeria sp.

The prerequisite plans include the following measures (according to FSIS Directive 641.1, verifying sanitary dressing and process control procedures in slaughter operations of cattle of any age):

- Animals should arrive with minimum mud and fecal contamination and avoid overcrowding to reduce the possibility of injury or unsanitary conditions;
- The capacity of livestock pens is enough to hold a single slaughter day;
- Washing of cattle to eliminate contamination on their hides, monitoring, verification, take corrective actions if there is any deviation;
- SOP for hide removal operations (using 2 knives of different colors);
- Minimize carcass contamination during all slaughter procedures (SOP procedures monitored and verified by Quality Assurance team);

ANIMAL WELFARE

Marfrig Global Foods is committed to following all Brazilian Legislative requirements. All Marfrig's facilities and process are constantly inspected by the Federal Service. The Agriculture Ministry (MAPA) supervision in all aspects of our process.

The Marfrig animal welfare department conducts a daily evaluation (e.g. general animal conditions and stunning efficiency) and weekly random routine evaluations during the live animals handling and slaughter process. Our unit is also annually audited by a third-party company to confirm our compliance to NAMI (North American Meat Institute) requirements: Recommended animal handling guidelines and audit guide established by Dr. Temple Grandin.

The guidelines consists of 100 animal observations per audit and evaluate the following aspects: stunning efficiency, animal vocalization, bleed rail insensitivity, electric prod use (maximum voltage is up to 50 volts), animal slipping and falling. Facilities, equipment and livestock unload practices are also audited and monitored. All employees are trained in appropriate classroom with written and visual resources to clearly describe the plant's policies and expectations.

Any animal that arrives at the establishment unable to move, that is, unable to walk alone, is immediately identified and the Federal Inspection Service is notified for evaluation by the official veterinarian to define the procedures relevant to humanitarian sacrifice.



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