



PREMIUM BLACK ANGUS BEEF

Creekstone Farms Premium Beef LLC Est. #27, has reassessed its HACCP Plans and implemented the appropriate programs/ policies to ensure compliance with FSIS Notice 56-07. Creekstone Farms has implemented the following programs to assure our customers that our company does not produce products that contain "AMR" (Advanced Meat Recovery), downer cattle, or any bone-in products derived from cattle 30 months of age and older, and/or any other SRM material as identified in 9 CFR part 309 and part 310.22.

- FSIS approved age verification and segregation of cattle programs through documentation and dentition of cattle. All carcasses identified as 30 months or older will have the vertebral column marked with blue ink, segregated, and ran separately from carcasses that are less than 30 months of age and at the end of the production day. All carcasses identified as 30 months and older will have the marked vertebral column removed during the fabrication process and thrown to inedible;
- FSIS approved downer policy that prohibits the use of non-ambulatory cattle in our edible process;
- Our company does not produce "AMR";
- Our company does not use an "air-injected" stun gun; and
- All SRM's are removed from the edible food chain (tonsils and small intestine of all cattle, and from cattle 30 months of age and older the head – skull, eyes, brain, and trigeminal ganglia; and the vertebral column – spinal cord and dorsal root ganglia).

Creekstone Farms Premium Beef LLC facilities Est. 27 is a Federally Inspected Establishment that is required to meet the requirements of 9 CFR 416 and 417. These regulations ensure that our facility has verified and validated their HACCP Programs and associated CCPs. This is continually monitored by FSIS personnel who are required to do so in order for product to contain the FSIS Mark of Inspection.

Creekstone Farms Premium Beef LLC has addressed the following regulatory requirements:

HACCP/ Pathogen Reduction Regulation Compliance

- ❖ Testing of carcasses for *E. coli* Biotype I (9 CFR Part 310, 310.25), effective June 1997. (Slaughter Plants)
- ❖ Implementation of SSOP (Sanitation Standard Operating Procedures, 9 CFR Part 416, 416.11-416.17), effective January 26, 1997.
- ❖ Implementation of HACCP Systems (9 CFR Part 417, 417.1-417.8), effective January 27, 1998 for plants with greater than 500 employees.
- ❖ Testing of carcasses and/or ground beef for Salmonella as conducted by USDA in accordance with 310.25.

Directive 6420.2 – Issued 3/31/04

Federal Register Docket 00-022N, dated 10/7/02 (*E. coli* 0157:H7 Reassessment)



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Specific to addressing regulatory requirements regarding *E. coli* 0157:H7, please be advised of the following actions:

- ♦ Reassessment of HACCP plans for *E. coli* 0157:H7 in accordance with the Federal Register Docket 00-022N, dated 10/7/02.
- ♦ Completion of annual reassessments of HACCP plans in accordance with 9 CFR 417.4(a)(3) effective January 26, 2004.
- ♦ CCP's in place and effect for zero tolerance requirements for head meat, cheek meat, and weasand. **Creekstone Farms does not produce weasand meat at this time. (Effective 8/1/16).

Directive 10,010.1 – revised 3/31/04

Directives 6100.2 – revised 9/17/07 and 6100.4 – Issued 9/13/07

FSIS Notice 65-07 – 10/12/07

Labeling

- USDA approval for the following label disclaimer/ instructional statements are available at Creekstone Farms, Est. 27
 - ***For Cooking Only***
 - ***Product has not been tested for *E. coli*0157:H7***

High Event Periods

- In May 2012, the United States Department of Agriculture's Food Safety Inspection Service issued "Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing *Escherichia coli* (STEC) Organisms or Virulence Markers". This guideline defines agency guidelines concerning High Event Periods (HEP) for beef trimmings. After consultation with Dr Mohammad Koohmaraie at IEH Laboratories, our Event Day policy was amended with these guidelines. We are currently using the Systematic HEP and Localized HEP definitions based upon 5% at a 95% confidence levels for daily decisions on HEP.
- The indication of a HEP is a loss of confidence in our food safety system, which failed to meet our guidelines established in our HACCP plan. HEP requires full investigation of our HACCP systems in accordance with the regulatory requirements established in 9 CFR 417.3(b). This may require additional sampling of trimmings; direction of trimmings testing both negative and positive within the HEP for "cooking only"; reassessment of HACCP plans; and / or sampling of untested sub-primal cuts. In all cases, this will be done under a test and hold methodology. The procedures are defined within our Standard Operating Guidelines manual.

Non-0157 STEC

CFPB puts producing safe food products at the utmost importance. CFPB has reviewed and reassessed our existing food safety systems, reviewed in-house data as well as the available published scientific



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research and have determined that our existing pathogen reduction technologies and slaughter process controls that we use to address *E. coli* 0157:H7 are effective in addressing the 6 STEC's. For continual validation, we will add STEC testing in as part of our routine Quarterly Validations as specified below.

Verification Tests for *E. coli* 0157:H7 and STEC

- Trim – Quarterly verification testing for *E. coli* 0157:H7 and 6 STEC's is conducted during the first and fourth quarters with increased testing conducted on a monthly basis during the second and third quarters
- Variety Meats - Quarterly verification testing for *E. coli* 0157:H7 and 6 STEC's is conducted during the first and fourth quarters with increased testing conducted on a monthly basis during the second and third quarters
- Updated letters are available for quarterly testing results.

Non-Intact

Creekstone Farms Premium Beef specifies that unless otherwise noted and ordered as such primal products packaged in vacuum bags and boxed are solely intended for intact use unless otherwise specified. CFPB expects any customer who purchases vacuum packaged beef primals either in boxes or combos and then uses that product for other than intact production, to address that specific usage within their HACCP plan and have the appropriate controls in place.

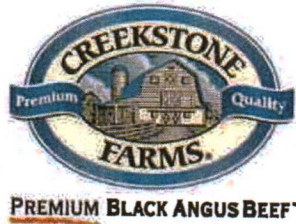
We are continuously striving to improve our food safety systems through the implementation of new technologies and systems as they become available. However, there is no technology available today that can guarantee fresh meat products are "free of pathogens". Therefore, we want to stress the importance of proper product handling and cooking procedures by you and your customers.

If you would like to review any of the procedures mentioned above, or if you have any questions, please feel free to contact me at (620)741-3152.

Creekstone Farms would like to offer a 24-hour Emergency Contact List to our customers. The following personnel may be contacted:

Gaylan Schroeder
Director of Quality Assurance and Food Safety
Office: (620) 741-3152
Cell: (620) 660-1626
gschroeder@cfpbeef.com

Ken Robinson
Director of Operations
Office: (620) 741-3173
Cell: (620) 660-5728
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Tad Meranda
Director of Shared Services
Office: (620) 741-3123
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Sincerely,

A handwritten signature in blue ink, appearing to read "Gaylan Schroeder". The signature is fluid and cursive, with the first name "Gaylan" being more prominent than the last name "Schroeder".

Gaylan Schroeder
Director of Quality Assurance, Food Safety
Creekstone Farms Premium Beef, LLC