



National Beef

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January 3, 2023

Dear Valued Customer:

National Beef packing is supplying this letter to clarify to our customers our Food Safety and Regulatory Compliance Programs that have been implemented to help ensure a quality and safe food product. National Beef Packing has implemented approved HACCP Programs and has periodically reassessed our established HACCP Programs and SSOP Programs as per all FSIS Notices and regulations

Plants Covered

Est. 262	Dodge City, Kansas
Est. 208A	Liberal, Kansas
Est. 8	Tama, Iowa (Iowa Premium)

HACCP and Interventions (Process aids)

National Beef's Food Safety process utilizes a multiple microbial reduction strategy that maintains the highest quality of product possible. Our HACCP Programs helps us to ensure that all products produced in our facilities are the safest in the industry. National Beef's multiple microbial reduction process includes numerous process aids and a validated CCP intervention (may vary between plants):

- (a) Finalyse (live animal treatment) – (Est 8)
Hide on Carcass Wash Cabinet (Est 262 and 208A)
- (b) Steam vacuum(s) – placed in strategic locations after hide removal (Est 262 and 208A)
- (c) Pre-Evisceration Hot Carcass rinse with Organic acid spray
- (d) Thermal Pasteurization – Plant CCP step designed and validated with both scientifically peer-reviewed and in-house microbial data to help eliminate or reduce pathogenic microbial (*E. coli* O157:H7) to below detectable limits. CCP is monitored and validated daily
- (e) Spray Chill treatment (Set 8)
- (f) Carcass Cooler Organic Acid carcass sprays (first as cattle exit Hot Box and second as they enter the fabrication floor)
- (g) Continued cold chain management throughout the remaining processes of the facility.
- (h) In addition to these interventions we have traditional inspection and trimming throughout the slaughter floor.
- (i) Offal Interventions – treatment of all products that are intended for grind
- (j) Primal and sub-primal products are subject to an antimicrobial spray after trimming but prior to or at bagging. The antimicrobial treatment has been tested in our establishments and has shown to be effective in the reduction of bacteria and is monitored as per our application program.

Regulatory Compliance

National Beef has met the FSIS requirements of 9 CFR 417 and 416 concerning our HACCP and SSOP Programs. We continue to validate our systems through monitoring of the hot water wash critical limits and routine testing of carcasses and trimmings for presence of *E. coli* O157:H7 daily as well as testing carcasses for Generic *E. coli*. Our facilities are also in compliance with FSIS regulated Salmonella testing on carcasses and ground beef.



National Beef is in compliance with the FDA Bioterrorism Act and is registered.

All cattle suppliers to National Beef are required to have current (within the past calendar year) signed affidavits on file attesting to compliance with all FDA feed and drug regulations and with 21 CFR 589.2000. Suppliers who do not have a current affidavit on file in our Kansas City headquarters are not eligible for marketing livestock to National Beef.

National Beef has implemented the appropriate programs/policies to ensure compliance with 9 CFR Parts 309, 310, 311, 313, 318, 319, etc. These Notices and Rules deal with three Regulations that prohibit the slaughter of non-ambulatory disabled cattle, a description and requirement to remove specified risk material (SRM) that are considered to be inedible and restricts the use of captive bolt stunners that deliberately inject compressed air into the cranium of an animal and does not allow "pithing".

- National Beef has programs and policies in place that prohibits the use of classified non-ambulatory (downers) from our edible process.
- We are currently identifying all animals that are classified as 30 months of age or older using dentition identification on the slaughter floor. These identified carcasses have the vertebral column (excluding the vertebrae of the tail, the transverse process of the thoracic and lumbar vertebrae, and the wings of the sacrum), removed on the fabrication floor.
- All SRM's are removed from the edible food chain (from all animals - all tonsils and the distal ileum of the small intestine; and from animals 30 months or older the head – skull, eyes, brain, and trigeminal ganglia; and the vertebral column – spinal cord and dorsal root ganglia).
- The captive bolt stunner that National Beef uses does not inject air into cranium of the animal nor does National Beef use any "pithing process" in stunning or SRM removal.

National Beef is assuring that we have addressed the following regulatory requirements:

- Testing of carcasses for *E. Coli* Biotype I (9 CFR Part 310, §310.25), effective June 1997.
- 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.

Federal Register Docket 00-022N, dated 10/7/02 (*E. coli* O157:H7 Reassessment)

- Completion of annual reassessment of HACCP plans in accordance with 9CFR 417.4 (a) (3) effective January 26, 2004 which included review and verification of adequacy of the HACCP plans in addressing *E. coli* O157:H7.

Directive 6420.2 – Issued 3/31/04

- CCP's are in place and effect for zero tolerance requirements for head meat, cheek meat and weasand meat.

Directive 10,010.1 Revision 3 – Issued 3/31/10

CFR Title 21 Part 589.2000

- Prohibits the feeding of ruminant meat and bone meal to ruminant animals

Labeling

- USDA approval for the following label disclaimer/instructional statements are available on site at the producing est.:



Disposition CCP's

- All materials that are tested for *E. coli* O157:H7 that are not negative are addressed within the HACCP plans under a product disposition CCP.
- These materials are controlled and are cooked or otherwise disposed of to inedible.
- Records reflect appropriate disposition of affected material.

Other FSIS Regulations/Notices

- **FSIS Notice 56-07**
- **FSIS Directive 6100.1 and 6100.4**
- National Beef facilities are Federally Inspected and meet and comply with all FSIS Regulations and Notices including but not limited to FSIS Notice 65-07.

Pathogen Testing for Trim Destined for Grind (trim unpackaged in combos)

National Beef Packing Co. has implemented a prescreening test protocol for all beef trimmings that have been identified as destined for used in raw ground beef. This protocol requires that these designated trimmings be:

- Lotted (in no more than 5 combos per lot)
- Sampled: Maybe conducted in one of the following methods:
 - N=60 surface incision pieces per lot for a min. 375gm final sample
 - IEH shaver method
 - Cloth (MicroTalley) Sampling Method
- Tested for *E. coli* O157:H7 (PCR DNA testing using BioControl GDS system, this method has been validated to meet USDA Criteria $\geq 98\%$ Sensitivity and $\geq 90\%$ Specificity).
- Verification of lab methods are done on a routine basis at our internal Food Labs in conjunction with the American Proficiency Institute Microbial Performance Program
- All customers that have signed the testing agreement with National Beef can receive COA's on tested lots. Those COA's clearly identify a N=60 sampling and PCR testing process.
- All ground beef produced at National Beef is derived only from raw material that has gone through stringent sampling and testing as described in this letter.
- National Beef has implemented a risk based statistical process to monitor and react "High Event Periods"

Non-Intact

National Beef Packing Co is clarifying that all product that we intend to go to a non-intact process will be tested and accompanied with a COA. For all other products (beef primals, sub primals or other muscle cuts produced at National Beef Packing Co) are to be considered as intact product and sold as intact. National Beef expects any customer who purchases vacuum packaged muscle cuts and then uses that product for other than intact production, to address that specific usage within their HACCP plan.

Animal Welfare

National Beef is committed to following all of the requirements of the "Humane Methods of Slaughter Act 1978". We are federally inspected facilities who have constant FSIS supervision on all aspects of our process.

- National Beef QA Department conducts weekly routine, random, unannounced audits of its live animal and knocking processes. These audits are done in accordance with AMI recommendations and the McDonalds Animal Handling Audit set up by Dr. Temple Grandin. They consist of 100 animal observations per audit and evaluate the following: Stunning



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Efficacy, Animal Vocalization, Bleed Rail Insensibility, Electric Prod Use, and Animal Slipping and Falling. Facilities, equipment and unloading practices are also audited and monitored. We also have routine third party audits of our humane handling processes and have a routine review conducted by Dr. Temple Grandin in each of our facilities in addition to the above-mentioned audit regime.

- All audit results are shared with Plant Management and it has been and continues to be our Company's policy to treat each animal that comes through our facility humanely.
- Plant Quality Assurance/HACCP personnel train all plant personnel that are involved in every critical aspect of the operation that deals with the live animal from live animal receiving through stunning at the knocking box area and bleed areas. National Beef employees are trained and must be approved by plant QA department for each of those positions on proper humane techniques of animal handling practices. The training includes a detailed class room setting training of both written and visual (pictorial) aids to clearly describe plant policies and expectations.
- Any animal that arrives at the facility that is immediately identified as a "Suspect Animal", a FSIS Veterinarian is notified, and appropriate disposition is made.
- National Beef has an active downer policy that prohibits the fabrication of any downer carcasses. A downer carcass will be considered any animal that is unable to enter or exit a trailer/truck under its own power, that does not pass USDA FSIS Ante mortem Inspection, or that is identified as a non-ambulatory animal at any time prior to the slaughter process.

Non O157 STEC

National Beef Packing considers food safety our top goal in meeting our customers' needs and doing our part in ensuring that we are supplying the highest quality product. NBP has reassessed our aggressive HACCP plan. In this reassessment, we used internal data, along with available published scientific research and current USDA FSIS guidance and public comments to determine that our current food safety system controls that we use to address *E. Coli O157:H7* are effective in addressing the 6 STEC's.

Consistent with USDA FSIS guidance and several recent public comments by FSIS, it is our position that it is prudent to wait on the implementation of testing until more can be learned about the prevalence of STEC's and until additional internal assessments can be made about the test systems that is currently available and their efficacy/accuracy. National Beef will use our effective robust N=60 trim sampling methodology for all trimmings that are destined for grinding to help ensure that we are not only adequately monitoring for and controlling *E. Coli O157:H7*, but also effectively addressing the 6 STEC's.

In addition, NBP will continue to conduct on-going STEC testing and research to further validate our processes on the control of STEC's. We will add STEC testing in as part of our routine Quarterly Validation of taking negatively tested trim, grinding and retesting for both *E. Coli O157:H7* and the 6 STEC's (this is done monthly in the summer months). We believe that this action is consistent with USDA FSIS expectations.

Sincerely,

Brenden McCullough
V.P. Technical Services
National Beef Packing Co. LLC