

# AURORA PACKING COMPANY, INC.

P O Box 209

North Aurora, IL 60542-0209  
(630) 897-0551 fax (630) 897-0647

## CONFIDENTIAL INFORMATION FOR INTERNAL USE ONLY BY CUSTOMERS OF AURORA PACKING COMPANY, INC.

January 2, 2014

RE: USDA-FSIS Regulation 44-02, *E. coli* O157:H7 Reassessment  
(Federal Register Document 00-022N, Issued October 7, 2002)  
USDA-FSIS Regulation 65-07, Notice of Reassessment for *E. coli* O157:H7  
(Federal Register Issued October 12, 2008)

Aurora Packing Company, Inc., USDA-FSIS Est. # M788, located at 125 S. Grant Street in North Aurora, Illinois is a high quality beef cattle slaughter and fabricating facility operating as USDA Est. No.788 under the Federal Meat Inspection program. The Aurora Packing Co. HACCP plan has been in effect since Jan. 27, 1997. Our HACCP plan is continually upgraded and has evolved with each new regulatory modification. Annual reassessments for *E.coli* O157:H7 are made as mandated by USDA-FSIS Regulation 44-02. CCP #4 was established to control *E.coli* O157:H7 following Regulation 44-02 reassessment. CCP #4 is a beef carcass anti-microbial intervention step called "Sanova" (ref: Federal Register/Vol.63, No.44, 21 CFR Part 173, 11119, Part 173.325) which greatly reduces pathogens to acceptable levels. Other beef slaughter floor microbial interventions are 2 Steam Vacuums, Sanovac System, two hind hock vacuums, CCP #1 variety meats zero tolerance and CCP #3 - visual inspection for Zero Tolerance. All CCP's are monitored and recorded multiple times daily to be within critical limits set forth during CCP validation steps. In the unlikely event of CCP failure, a HACCP corrective action contingency will eliminate the possibility of non-compliant food products from entering commerce.

**CCP # 4 is a validated microbial intervention designed to greatly reduce *E.coli* O157:H7 below detectable levels.** Based on the research conducted by Norasak et al, at U. S. Meat Animal Research Center, the results indicate that the reduction of non-O157 STEC (includes serotypes O26, O45, O103, O111, O121, O145) by antimicrobial interventions like Sanova were at least as great as for *E. coli* O157:H7. Another research conducted by Ifigenia et al, at Colorado State University also indicate that the effects of antimicrobials like Sanova against the non -O157 STEC serotypes were generally the same as those against *E. coli* O157:H7. Effectiveness of these microbial interventions is validated. Aurora Packing Co. retains Advanced Food Safety Solutions as a food safety consultant and conducts specific joint annual HACCP reviews. Beef carcass testing for generic *E.coli* (9 CFR 310.25) is conducted daily on a random basis of 1 test occurrence per 300 cattle slaughtered.

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Aurora Packing Company is in full compliance with the following USDA Directives:  
{6700.1(9 CFR 441.10(a), 9 CFR 441.10(b)) {44-02, E. coli 0157:H7 Reassessment}  
{Salmonella Reduction 9 CFR Part 310, 310.25} {SSOP 9 CFR Part 416, 416.11-17}  
{HACCP 9 CFR Part 417, 417.1-8} {9 CFR 310.25}  
{9 CFR 309-311, 318-319, Docket No. 03-0251F}  
{9 CFR 301, 318, 320 Docket No. 03-038 IF}  
{Directive 6420.2, issued March 31, 2004} {Directive 10,010.1 revised March 31, 2004}  
USDA-FSIS Notice 65-07, issued October 12, 2007

The Aurora Packing Company production facility meets or exceeds all USDA requirements for producing, selling and shipping bone-in or boneless beef into commerce. Customers will be notified if Sanova, CCP No. 4, the microbial intervention used to reduce *E. coli* O157:H7 and STEC pathogens to below detectable levels, is found to be ineffective.

**Special Notice: Aurora Packing Company does not sell any beef products intended for grinding as raw ground beef and, as such, does not routinely test for *E. coli* O157:H7 and STEC pathogens. All beef trimmings manufactured by Aurora Packing Company, 50/50, 75/80 and/or 90% lean trimmings are sold to Federally inspected establishments that maintain a lethality step (destructive for pathogens such as *E. coli* O157:H7 and /STEC) in their HACCP plan for "Fully Cooked Ready to Eat", "Heat Treated Shelf Stable" and/or at a minimum providing a full lethality treatment per 9CFR 318.17(a) (1) (Appendix A).**

If there are questions or if I may be of further assistance please contact me at:  
(630) 897-0551 by phone or fax @ (630) 897-2992 or email: [mdoty@aurorapacking.com](mailto:mdoty@aurorapacking.com)  
Respectfully,

*Marvin E Doty*

Marvin E. Doty, V.P. Compliance & Regulatory Affairs  
Aurora Packing Company, 125 Grant Street, Aurora, IL 60542