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HACCP documentation

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January 2, 2014

Dear Valued Customer:

JBS USA, LLC would like to inform you and your company of the Food Safety and Regulatory Programs, and other significant Programs which we have implemented at each of our beef harvest and/or processing locations noted below:

Est. 3D – Cactus, Texas	Est. 628 – Hyrum, Utah
Est. 969G – Grand Island, Nebraska	Est. 562M – Plainwell, Michigan
Est. 969 – Greeley, Colorado	Est. 1311 – Souderton, Pennsylvania
Est. 562 – Green Bay, Wisconsin	Est. 267 – Tolleson, Arizona
¹ Est. 532 – Omaha, Nebraska	Est. 38 – Brooks, Alberta, Canada

The programs outlined below have been implemented in order to comply with the United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) and Canadian Food Inspection Agency (CFIA) Regulations regarding HACCP and *E. coli* O157:H7 testing.

Food Safety Programs

Please be advised that each of the JBS USA, LLC beef facilities listed above operate under a fully implemented Hazard Analysis and Critical Control Point (HACCP) plan, which conforms to all applicable requirements set forth in 9 CFR Part 417. All products produced at these JBS facilities are subjected to these HACCP systems. Additionally, all JBS facilities perform generic *E. coli* biotype I (MOP CH 11, USA, § T.2.1) testing on carcasses and participate in the USDA-FSIS *Salmonella* sampling per 9 CFR 310.25 and MOP CH 11, USA, Annex U.

Occasionally, due either to changes in the regulations, plant procedures, or nationwide information that may affect the hazard analysis or alter the critical control points, the adequacy of the HACCP Plan is reassessed as required under 9 CFR 417.4(a)(3). More specifically, we have reassessed our plan as required by USDA-FSIS Federal Register Notice dated October 7, 2002 and FSIS Notice 65-07 dated October 12, 2007 and are in compliance with all parts of 9 CFR 417. At a minimum, each facility re-assesses their respective HACCP plan annually.

JBS USA, LLC Food Safety processes consist of Standard Operating Procedures (SOPs), Sanitation Standard Operating Procedures (SSOPs) 9 CFR Part 416, Hazard Analysis Critical Control Points (HACCP) 9 CFR Part 417, and validated technology interventions, which are designed to eliminate or reduce *E. coli* O157:H7 to below detectable levels. Our Food Safety Process utilizes technology interventions (Multiple Hurdle Strategy) during harvest and fabrication which may include steam vacuums, pre-evisceration wash and/or chemical treatment, thermal pasteurization (CCP), organic acid applications, finished product organic acid applications, and cold chain management (CCP) systems. Our variety meat / offal processing also utilize organic acid application (CCP for Red Meat Offal) and cold chain management (CCP) systems. Our ground beef processing utilize purchase specifications requiring raw material be pre-screened negative for *E. coli* O157:H7 and cold chain management (CCP). Our Food Safety Process is monitored by Operations personnel and verified by Quality Assurance

JBS Beef Food Safety Letter 01.02.14
¹ Effective April 8, 2013 JBS USA formalized ownership of Omaha Est# 532



and USDA-FSIS personnel in each plant. Inspection and process verification by USDA-FSIS personnel occurs before the mark of inspection can be placed on products which will enter into commerce.

Prior to shipment of our products, we determine that all CCPs have been met and that our process is under control per 9 CFR 417. If our CCPs have not been met or have been found to be ineffective, corrective and preventative actions are taken as required under 9 CFR 417.3. Effectiveness of our ability to meet the Critical Limits outlined in our HACCP plan is evaluated daily through pre-shipment records review and records verification checks.

In addition all JBS USA LLC facilities have implemented these additional programs:

- A written Good Manufacturing Procedures (GMP) program.
- A Recall/Market Withdrawal Procedure, which provides for trace-back and track-forward capabilities to ensure that the proper products and dates can be identified if necessary.
- A livestock certification program which requires all cattle producers to certify compliance with 21 CFR 589.2000.
- A documented Pest Control Program.
- A documented Food Security Program (Note: details of these programs are not shared or distributed to ensure the integrity of the program.).
- We use only approved third party and customers' audits to confirm that our Food Safety Process is working.
- We utilize insured and bonded Carriers to Transport JBS beef products. All loads are sealed at the originating establishment and maintained under seal by the carrier in the event of a multi-stop load.

E. coli O157:H7 Control and Testing

Please note that vacuum packaged beef subprimals and vacuum packaged offal red meats sold in a box are not intended for use in ground products.

We perform microbial testing of beef manufacturing trimmings, specially packaged sub-primals (i.e., unwrapped and bulk packed in combo), and bulk packaged offal red meats destined for raw comminuted finished products. Beef manufacturing trimmings (including unwrapped bulk packed sub-primals intended for further processing) that are tested for *E. coli* O157:H7, utilize a robust sampling method and based on the International Commission on Microbiological Specifications for Foods (ICMSF) Case 15, two-class sampling plan for a severe hazard (i.e., N=60). These samples (100% of sample) are analyzed by an accredited laboratory utilizing an AOAC approved methodology. Laboratory methods used have been demonstrated to be at least as sensitive and specific as the FSIS methods and MLG 5.05, October 1, 2010 and CFIA Annex O.

Daily carcass verification testing for *E. coli* O157:H7 is conducted at JBS Food Canada Inc.



If products have been tested for *E. coli* O157:H7, shipments will be accompanied with a Certificate of Analysis (COA) indicating the results of the tests in the form of a Raw Material Notification Document (RMND), a signed letter from the plant, or a copy of the laboratory results. Test results from sampled products represent complete lots unless otherwise noted. The absence of a COA is indication that the product has either not been tested or the customer has not purchased tested products at the time of sale. If a COA is provided for *E. coli* O157:H7, then the samples that are listed in that report represent products that were produced from a system that controls both *E. coli* O157:H7 and non-O157 STECs.

Analysis of samples for *E. coli* O157:H7 is conducted by 3rd party laboratories. Respective laboratories used by each facility location along with that laboratory's accreditation information and testing methodologies are posted on our customer website (see details at the end of this letter).

Each of our establishments have a third party verification of our *E. coli* O157:H7 sampling program via an annual audit of the process that is performed between April and September. Additionally, raw material components which have previously been tested and found negative for *E. coli* O157:H7 are sampled and analyzed (*E. coli* O157:H7 and top 6 non-O157 STECs) to verify the effectiveness of our N=60 sampling technique. This sampling of beef manufacturing trimmings (including unwrapped bulk packed sub-primals intended for further processing) is conducted at a minimum of once quarterly with increased monthly sampling during high prevalence months (i.e., April through September) and the results are posted on our customer website (see details at the end of this letter).

In our JBS Food Canada Inc. facility, boxed product known to be intended for raw ground use, i.e., beef trimmings from carcasses, head and cheek meat, hearts, hanging tenders and weasand meats are known to be intended for raw ground use and therefore robustly sampled utilizing N60 or equivalent methods. These products are identified by a "T" on the label within the product code on the individual boxes.

With specific regard to the ground beef products produced by our facilities, all raw materials that will be used in the manufacture of these products are tested and found negative for *E. coli* O157:H7 prior to their use, as described in the methods above. Notification of raw material testing is provided on a load by load basis on the Bill of Lading documents accompanying every ground beef load. External sources of raw material used by JBS Food Canada Inc. must meet or exceed JBS Food Canada Inc. requirements per Supplier Addendum.

Event Program

While we employ exhaustive interventions and testing, there is no available technology which can guarantee that fresh meat products are "free of pathogens". JBS evaluates each non-negative event to determine if the level of non-negative results on any given production day or production period exceeds statistically determined levels. If it is determined that the non-negative results constitute an "Event", an evaluation of products produced within the associated time or day is conducted and appropriate disposition is made of any potentially affected product.



Beef Subprimal Antimicrobial Treatment

Our beef facilities apply multiple antimicrobial treatments to carcasses and primals/subprimals after the final slaughter Critical Control Point (CCP) intervention. Our facilities apply an antimicrobial solution to the subprimals and trimmings at the end of the fabrication process prior to packaging.

The antimicrobial treatments utilized are approved by USDA-FSIS as 'processing aids' and comply with the approval issued in Directive 7120.1 for use and labeling or by CFIA / Health Canada. These 'processing aids' have been validated through in-house sampling of generic microorganisms. Although these process aids are employed by all plants as a part of our multiple hurdle food safety approach, they are not defined as critical control points in our HACCP plans.

Non-O157 Shiga Toxin producing *E. coli* (STEC)

Scientific research has shown that the same interventions that are effective for controlling, reducing, or eliminating *E. coli* O157:H7 are also just as effective on the non-O157 STECs (Kalchayanand, N. et al., 2012). Industry data has proven that a production system that controls the presence of *E. coli* O157:H7 also effectively controls the presence of non-O157 STECs. Our Food Safety processes consist of Standard Operating Procedures (SOPs), Sanitation Standard Operating Procedures (SSOPs) 9 CFR Part 416, Hazard Analysis Critical Control Points (HACCP) 9 CFR Part 417, and validated technology interventions, which are designed to eliminate or reduce *E. coli* O157:H7 to below detectable levels; hence controlling the non-O157 STEC levels to the same degree. It is the opinion of JBS that testing beef manufacturing trimmings and ground beef for non-O157 STECs would not increase the robustness of our food safety programs. Therefore, we will not test our beef manufacturing trimmings or ground beef for the non-O157 STECs.

Additional Information

Our U.S.A. facilities are USDA-FSIS inspected establishments. Each animal slaughtered and processed at our facilities undergo antemortem and postmortem inspection by FSIS personnel, who determine which carcass and parts are free of disease and are wholesome.

JBS Food Canada Inc. is a federal establishment and operates under CFIA regulatory FSEP and Mandatory HACCP requirements. By applying the Mark of Inspection, we are obligated to adhere to all applicable requirements contained therein.

JBS U.S.A. facilities comply with FSIS Directive 10,800.1, July 12, 2007, entitled "Procedures for Residue Sampling, Testing, and Other Responsibilities for the National Residue Program."



In addition to the above, our process also includes a continuing product guarantee, which we provide to our customers upon request. In addition, our Bill of Lading contains statements regarding HACCP Programs and SRM control.

JBS is compliant to USDA-AMS-ARC regulations based on an export country's specific requirements – view approval at website: <http://www.ams.usda.gov>.

You are cordially invited to visit our facilities and review our processes, with proper notification provided through your Sales Representative or other JBS contact. We trust this information is useful to you and we look forward to serving you as a customer and as a partner of JBS.

We hope that you find this information useful in reassessing your programs with regard to the above mentioned regulations. The most recent version of this letter and other related food safety information can be found under 'Our Responsibility – Food Safety – HACCP Documentation' on our www.jbssa.com website located at: <http://www.jbssa.com/Responsibility/FoodSafety/default.aspx>. We look forward to continuing to provide you with wholesome, quality products.

If you need additional information, please contact our Beef Food Safety Team:

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Respectfully,

John R. Ruby, Ph.D
Head of Technical Services
JBS USA, LLC

Reference:

Kalchayanand N, Arthur T, Bosilevac J, Schmidt J, Wang R, Shackelford S, and Wheeler T. 2012. Accepted *J. Food Protection*. Evaluation of Commonly Used Antimicrobial Interventions for Fresh Beef Inoculated with Shiga toxin-producing *Escherichia coli* serotypes O26, O45, O103, O111, O121, O145, and O157:H7.