



PREMIUM BLACK ANGUS BEEF™

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To Our Valued Customer:

At Creekstone Farms Premium Beef, we are committed to providing the highest quality products possible for our customers and their families. In doing so, we continuously monitor our food safety programs for any areas of improvement.

Creekstone Farms Premium Beef, LLC slaughters, fabricates, and further processes Black Angus Beef at USDA FSIS Est. 27, which operates under the regulatory requirements set forth in title 9CFR by using an approved Hazard Analysis and Critical Control Point (HACCP) food safety system (9CFR§417) that was implemented in June 2003.

The system incorporates USDA Best Practices to identify and control hazards within our production facility to minimize the potential for contamination with *E. coli* 0157:H7, a known adulterant addressed in the October 7, 2002 USDA FSIS notice. HACCP plans are routinely reassessed with updates documented per 9CFR§417.4(a)(3) at a minimum on an annual basis. Our last reassessment occurred on December 26, 2018.

Our food safety program also consists of Standard Operating Guidelines (SOG's) and Sanitation Standard Operating Procedures (SSOP's) per 9CFR§416.

Creekstone Farms Premium Beef's Food Safety Systems utilizes a multiple hurdle approach to food safety that includes several intervention strategies which helps ensure that all product produced at our facility is produced in a safe manner. These multiple hurdler processes includes process aids and validated CCP intervention and include:

1. Hide on Wash System – Used after exsanguination to clean hide of mud
2. Hock Vacuums – Used to wash the hocks after the hide removal process
3. Steam Vacuums – Placed in areas of the process where hide opening occurs (pattern marking)
4. Pre-Evisceration Hot Water Rinse (PECS) – Carcasses are surface treated with hot water for purpose of reducing microbial contamination
5. Carcass trim and inspection throughout the slaughter process – Strategically placed to address pattern opening areas
6. Organic acid interventions
  - Before carcass chill
  - Following USDA grading
  - Entering the fabrication floor



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- Primals and trimmings – are treated with an approved processing aid after trimming but prior to bagging

#### 7. Temperature Management

**HACCP Interventions (CCP- Critical Control Points):** Critical Control Points are in place and validated for the control of enteric pathogens, specifically *E.coli* 0157:H7. All CCPs are monitored and validated on a regular basis.

- Zero Tolerance for fecal, milk, and ingesta contamination (Directive 6420.2)
- Hot Water Wash – Designed and validated both scientifically and with in-house microbial data to help eliminate or reduce pathogenic microbial (*E.coli* 0157:H7) to below detectable limits.
- Product Chilling
- Product Temperature
- Organic Acid Application for Offal Products

These interventions are strategically placed to minimize the risk of pathogenic bacteria contamination (*E. coli* 0157:H7 and non-0157 STECs) and are validated on a regular basis. Studies have found that interventions used to reduce the risk of *E. coli* 0157:H7 are equally effective at reducing bacterial loads of non-0157 PSTECs and *Salmonella* spp.

In addition to the listed interventions, we test for generic *E. coli* Biotype I (9 CFR Part 310, 310.25), Aerobic Plate Count (APC), and coliforms. Our facility is also in compliance with FSIS regulated *Salmonella* testing on carcasses in accordance with 310.25.

Creekstone Farms Premium Beef, LLC is compliant and registered with the Food and Drug Administration Bioterrorism Act, registration number 11306541790. We require that all cattle suppliers have current, signed affidavits on file attesting to compliance with all FDA feed and drug relations; including 21 CFR 589.2000. The signed affidavits are updated on a yearly basis and cattle suppliers without an updated affidavit will not be eligible to supply cattle to our facility.

Creekstone Farms Premium Beef, LLC has a recall plan in place that includes notification to affected customers and program testing on a bi-annual basis, with the latest test being conducted December 29, 2018. This program has been established to assure product recovery in accordance with USDA FSIS regulated codes of practice, FSIS Notice 8080.1 Rev 6 10/26/10, and FSIS Notice 67-12 11/5/12. This program has been in place since the start of production in 2003. We also have a written and monitored Pest Control Program which uses USDA approved chemicals.

All raw material used for the production of ground beef are required to have been tested and found to be negative for *E. coli* 0157:H7. Materials undergo a robust sampling protocol (N=60) and are tested utilizing PCR methodology at an ISO 17025 registered third party laboratory. All associated products are placed in a test and hold methodology until negative results are received. Creekstone Farms does not receive trimmings from outside sources to be used in our Ground Beef manufacturing processes.



PREMIUM BLACK ANGUS BEEF™

Any product testing presumptive positive will be labeled "For Cooking Only" and sold to Federally Inspected establishments for further processing, or otherwise disposed of to inedible or rendering. The purchaser will be required to supply a three part cooking letter for our records and tracking purposes.

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.



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#### **Directive 6420.2 – Issued 3/31/04**

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

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 Koochmaraie 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 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**

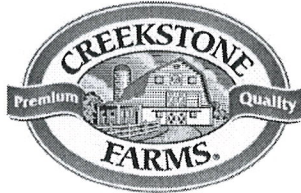
Creekstone Farms Premium Beef specifies that unless otherwise noted and ordered as such primal products packaged in vacuum bags and boxed are solely intended for intact use unless otherwise specified. CFPB expects any customer who purchases vacuum packaged beef primals either in boxes or combos and then 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)741-3173.

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

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Sincerely,

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