January 2, 2019

LETTER OF GUARANTEE 2019

CAVINESS BEEF PACKERS, LTD

Est. 675 (Harvest)(Fabrication)

Caviness Beef Packers, LTD Est#675, hereinafter referred to as CBP, is a Federally Inspected Establishment that is in compliance with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. All products delivered to you have been processed by approved methods and are solely derived from domestic cattle. CBP is in compliance with the latest revisions of FSIS Directives 5000.1, 6410.1, 6420.2, 10010.1, and 10800.1. We participate in 3rd Party Audits which consist of a BRC Audit, an Animal Welfare Audit, a SRM Addendum Audit, and an E. coli O157:H7 Addendum Audit. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CBP produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). We utilize four validated and verified intervention steps that provide our customers with products which meet or exceed FSIS and Industry Microbial and Quality Standards. HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)) with last annual reassessment completed January 2, 2019.

E. Coli O157:H7 – CCP's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures. By means of this robust sampling methodology we assure control, elimination, and/or reduction of E. Coli O157:H7 and other pathogens (including Salmonella) to below detectable levels.

BIG 6 NON-O157 STECs – CBP produces product utilizing a validated multiple hurdle approach system that controls E. coli O157:H7 and also controls the "Big 6" Non-O157:H7 Shiga-Toxin producing E. coli (STEC). We have a program in place, which was implemented April 2015 that validates our interventions on a monthly basis through analysis of E. coli O157:H7 as well as the "Big 6" serogroups (STEC; 026, 045, 0103, 0111, 0121, and 0145).

SALMONELLA – We adhere to the Salmonella Performance Standards as per 9 CFR §310.25.

SAMPLING – Samples are collected by **three** methods; N=60 Excision in which 5 or less combos of beef trim comprise one lot, IEH's N60 Plus Sampler which consist of single combo lots, **and Fremonta's MicroTally MSD cloth sampling represented by single combo lots.** The minimum weight to be tested for excision is 375g. Certificate of Analysis reports accompany all tested beef trim loads. Lab method used for commercial lots is Biocontrol's GDS AOAC# 2005.04 **in which a matrix extension justifies the use for Cloth Sample analysis.** All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025:2005 *General Requirements for the Competence of Testing and Calibration Laboratories.* Packaged subprimals placed into commerce are microbiologically independent by means of being processed and packaged separately from other product without commingling. Boxed vacuum packaged beef subprimals are not intended for use in raw ground products. We perform carcass sampling for Generic E. coli as per 9 CFR §310.25.

HEP – CBP has established a rigorous statistically based High Event Period program that mimics *FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers,* August 2014. We have measures in place to prevent HEP implicated product from being released into commerce which include notification of customers.

CAVINESS
BEEF PACKERS

January 2, 2019

FOOD DEFENSE – CBP has a Food Defense Plan and other pre-requisite programs in place that assures that no article of food sold to a customer will be adulterated, or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act of 1938, the Federal Fair law; during procurement, production, storage or transportation. Product will be processed in accordance with 21 CFR §110.

INTERVENTIONS – CBP has five interventions that meet requirements of FSIS Directive 7120.1 and the USDA-FSIS Interim Final Rule published in the Federal Register on January 12, 2004. All interventions are validated on a Quarterly basis. We utilize Lactic Acid (LA) as an antimicrobial processing aide at the last two locations listed below.

1.	Hot Water Pre-Evisceration Carcass Wash Cabinet	– DOK
2.	Hot Water Carcass Wash Cabinet	– DOK – CCP
3.	Lactic Acid Carcass Spray Cabinet	– DOK – CCP
4.	DBDMH Spray Chill	– DOK/DOF
5.	ASC Carcass Spray Cabinet	– DOF
	LA Trim Spray	– DOF
	LA Subprimal Spray	– DOF

HUMANE HANDLING – CBP is in compliance with FSIS Directives 6900.2 and 9 CFR §313 which address Humane Handling and Slaughter of Livestock.

SRM & BSE – We produce product free from Specified Risk Materials; skull, brain, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, and vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), small intestine and tonsils from bovine animals. SRMs have been addressed in our HACCP Plan and pre-requisite programs. We do not accept or slaughter non-ambulatory disabled livestock. We are in compliance with FSIS Notice 56-07. CBP is in compliance with 9 CFR §309, §310, §311, §318, Directive 6100.1 and 6100.4. The SRM brain matter is addressed at the stunning process meeting requirements in 9 CFR §313.15(b)(2)(ii), (air injection stunning devices are not in use at our facility).

RUMINANT FEED BAN – CBP is in compliance with 21CFR589.2000 and 589.2001 which prohibit the feeding of ruminant meat and bone meal to ruminant animals. Records and affidavits are on file for all cattle purchased.

AMR – CBP does not produce AMR (advanced meat recovery) products.

ALLERGENS – CBP does not utilize allergens in any of our processes.

Sincerely,

Jorge Aleman
Director of FSQA
Caviness Beef Packers, LTD
(806) 357-2462 Office
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jaleman@cavinessbeef.com

January 2, 2019

LETTER OF GUARANTEE 2019

CS BEEF PACKERS, LLC – Est# 630

CS Beef Packers, LTD Est#630, hereinafter referred to as CS, is a Federally Inspected Establishment that complies with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. CS complies with the latest revisions of FSIS Directives 5000.1, 6410.1, 6420.2, 10010.1, and 10800.1. We participate in 3rd Party Audits which consist of a BRC Audit, an Animal Welfare Audit, a SRM Addendum Audit, and an E. coli O157:H7 Addendum Audit. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CS produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). We utilize four validated and verified intervention steps that provide our customers with products which meet or exceed FSIS and Industry Microbial and Quality Standards. HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)) with last yearly reassessment completed January 2, 2019.

E. Coli O157:H7 – CCP's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures. By employing this robust sampling methodology, we assure control, elimination, and/or reduction of E. Coli O157:H7 and other pathogens (including Salmonella) to below detectable levels.

BIG 6 NON-O157 STECs – CS produces product utilizing a validated multiple hurdle approach system that controls E. coli O157:H7 and also controls the "Big 6" Non-O157:H7 Shiga-Toxin producing E. coli (STEC). We have a program in place that validates our interventions on a monthly basis through analysis of E. coli O157:H7 as well as the "Big 6" serogroups (STEC; 026, 045, 0103, 0111, 0121, and 0145).

SALMONELLA – We adhere to the Salmonella Performance Standards as per 9 CFR §310.25.

SAMPLING – Samples are collected by **three** methods; N=60 Excision in which 5 or less combos of beef trim comprise one lot, IEH's N60 Plus Sampler which consist of single combo lots, **and Fremonta's MicroTally MSD cloth sampling represented by single combo lots.** The minimum weight to be tested for excision is 375g. Certificate of Analysis reports accompany all tested beef trim loads. Lab method used for commercial lots is Biocontrol's GDS AOAC# 2005.04 **in which a matrix extension justifies the use for Cloth Sample analysis.** All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025:2005 *General Requirements for the Competence of Testing and Calibration Laboratories.* Packaged subprimals placed into commerce are microbiologically independent by means of being processed and packaged separately from other product without commingling. Boxed vacuum packaged beef subprimals are not intended for use in raw ground products. We perform carcass sampling for Generic E. coli as per 9 CFR §310.25.

HEP – CS has established a rigorous statistically based High Event Period program that mimics *FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers,* August 2014. We have measures in place to prevent HEP implicated product from being released into commerce which include notification of customers.

January 2, 2019

FOOD DEFENSE – CS has a Food Defense Plan and other pre-requisite programs in place. This program assures that no article of food sold to a customer will be adulterated, or misbranded within the meaning of the Federal Food, Drug, and Cosmetic Act of 1938, the Federal Fair law; during procurement, production, storage or transportation. Product will be processed in accordance with 21 CFR §110.

INTERVENTIONS – CS has five interventions that meet requirements of FSIS Directive 7120.1 and the USDA-FSIS Interim Final Rule published in the Federal Register on January 12, 2004. All interventions are validated on a Quarterly basis. We utilize Lactic Acid (LA) as an antimicrobial processing aide at the last two locations listed below.

1.	Hot Water Pre-Evisceration Carcass Wash Cabinet	– DOK
2.	Hot Water Carcass Wash Cabinet	– DOK – CCP
3.	Lactic Acid Carcass Spray Cabinet	– DOK – CCP
4.	DBDMH Spray Chill	– DOK/DOF
5.	ASC Carcass Spray Cabinet	– DOF
	LA Trim Spray	– DOF
	LA Subprimal Spray	– DOF

HUMANE HANDLING – CS complies with FSIS Directives 6900.2 and 9 CFR §313 which address Humane Handling and Slaughter of Livestock.

SRM & BSE – We produce product free from Specified Risk Materials; skull, brain, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, and vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), small intestine and tonsils from bovine animals. SRMs have been addressed in our HACCP Plan and pre-requisite programs. We do not accept or slaughter non-ambulatory disabled livestock. We comply with FSIS Notice 56-07. CS complies with 9 CFR §309, §310, §311, §318, Directive 6100.1 and 6100.4. The SRM brain matter is addressed at the stunning process meeting requirements in 9 CFR §313.15(b)(2)(ii), (air injection stunning devices are not in use at our facility).

RUMINANT FEED BAN – CS complies with 21CFR589.2000 and 589.2001 which prohibit the feeding of ruminant meat and bone meal to ruminant animals. Records and affidavits are on file for all cattle purchased.

AMR – CS does not produce AMR (advanced meat recovery) products.

ALLERGENS – CS does not utilize allergens in any of our processes.

Sincerely,

Roger Cooper
FSQA Manager
CS Beef Packers
roger.cooper@csbeef.com

January 2, 2019

LETTER OF GUARANTEE 2019

Caviness Beef Packers, LTD – Amarillo

Est# 7282 (Grind Processing & Trim Packaging)

Caviness Beef Packers, LTD – Amarillo Est#7282, hereinafter referred to as CBA, is a Federally Inspected Establishment that is in compliance with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. All products delivered to you have been processed under approved methods and are derived from domestic cattle. Our beef trim sole supplier is Caviness Beef Packers, LTD – Hereford Est#675, hereinafter referred to as CBH. CBH has in place a Specified Risk Material (SRM) program for the identification and removal of all SRM's. CBA is compliant with FSIS Directives 5,000.1 and 10,010.1. We participate in 3rd Party Audits which consist of a BRC Audit and an E. coli O157:H7 Addendum Audit. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CBA produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)). All CCPs are monitored and verified to assure proper prevention, reduction, and/or elimination of E. Coli O157:H7 to below detectable levels.

E. Coli O157:H7 – By requiring robust sampling methodology of our raw material supplier and negative COAs for the receiving of trim products, we assure control, elimination, and/or reduction of E. Coli O157:H7 and also control the "Big 6" Non-O157 STECs in addition to other pathogens (including Salmonella) to below detectable levels. Under CBA SOP #16.0, suspect or non-negative samples for E. coli O157: H7 or Big 6, are returned/rejected back to originating establishment.

SAMPLING – Raw Material samples are collected by N=60 or better standards in which 5 or less combos of beef trimmings comprise one lot. The minimum weight to be tested for commercial trim is 375 grams. We also do finished product testing of random sub-lots for further verification. Lab method used is PCR Biocontrol AOAC# 2005.04. All laboratories used for microbiological testing are AOAC approved in accordance with recognized International Standard ISO/IEC 17025:2005 General Requirements for the Competence of Testing and Calibration Laboratories. All testing information is utilized to track trends and patterns in microbial detections for more effective preventions and for needed adjustments to be made to processing controls.

FOOD DEFENSE/FOOD SECURITY – CBA has a Food Defense Plan / Food Security Plan in place that assures that no article of food sold to a customer will be adulterated, or misbranded, within the meaning of the Federal Food, Drug and Cosmetic Act of 1938; during the procurement, production, storage and/or transportation of all products. Products are processed in accordance with 21 CFR §110. This facility has implemented Pre-Requisites, GMPs, SOPs, and SSOPs programs designed to provide the best product to our customers.

ALLERGENIC PRODUCT CONTROL – CBA has SOP's and SSOP's as part of an Allergenic Product Control Plan in place that assure that non-allergen products are not labeled as containing allergenic product, are not co-mingled or pass across the same product surfaces without proper washed down, pre-op, and swabbing of equipment utilized to test for specific allergen residues being left over.

ADDED SEASONINGS – Caviness Beef – Amarillo utilizes added seasonings as part of customer required specification for specific products. These seasonings are verified by LOG (Letter Of Guarantee) to be produced in the United States and are set on schedule to be utilized in production after products that do not contain or require seasonings. A FIFO (First In First Out) staging is utilized to assure that seasonings used are not expired for the freshest use on added seasonings.

SHELF LIFE STUDIES – Shelf Life studies are performed yearly. If processing aids are introduced to be utilized at any point of the process, products will be resubmitted for testing to assure shelf life remains the same or to have changes documented. In-house testing of product freshness is also conducted as part of validating Shelf Life dating chosen for specific fresh or frozen products as per customer requirements.

GASED PRODUCTS – CBA utilizes product gases for Shelf Life on fresh patty products as part of specific customer specifications. Gas utilized is a Bi-gas with a low – no oxygen mixture of 30/70% to help promote the shelf life of patty products. Gas is metered and monitored during the use into specified products.

HUMANE HANDLING – All Humane Handling is performed at CBH. CBA is a Grinding and trim repackaging facility only.

AMR – CBA does not produce or use AMR (Advanced Meat Recovery) products

LFTB – CBA does not utilize LFTB (Lean Finely Textured Beef) in any of our products.

Sincerely,

Jorge Aleman
Director of FSQA
Caviness Beef Packers, LTD
(806) 357-2462 Office
(806) 290-8620 Cell
jaleman@cavinessbeef.com

January 2, 2019

LETTER OF GUARANTEE 2019

Caviness Beef Packers, LTD – Amarillo

Est# 7282 (Grind Processing & Trim Packaging)

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E. Coli O157:H7 – By requiring robust sampling methodology of our raw material supplier and negative COAs for the receiving of trim products, we assure control, elimination, and/or reduction of E. Coli O157:H7 and also control the "Big 6" Non-O157 STECs in addition to other pathogens (including Salmonella) to below detectable levels. Under CBA SOP #16.0, suspect or non-negative samples for E. coli O157: H7 or Big 6, are returned/rejected back to originating establishment.

SAMPLING – Raw Material samples are collected by N=60 or better standards in which 5 or less combos of beef trimmings comprise one lot. The minimum weight to be tested for commercial trim is 375 grams. We also do finished product testing of random sub-lots for further verification. Lab method used is PCR Biocontrol AOAC# 2005.04. All laboratories used for microbiological testing are AOAC approved in accordance with recognized International Standard ISO/IEC 17025:2005 General Requirements for the Competence of Testing and Calibration Laboratories. All testing information is utilized to track trends and patterns in microbial detections for more effective preventions and for needed adjustments to be made to processing controls.

FOOD DEFENSE/FOOD SECURITY – CBA has a Food Defense Plan / Food Security Plan in place that assures that no article of food sold to a customer will be adulterated, or misbranded, within the meaning of the Federal Food, Drug and Cosmetic Act of 1938; during the procurement, production, storage and/or transportation of all products. Products are processed in accordance with 21 CFR §110. This facility has implemented Pre-Requisites, GMPs, SOPs, and SSOPs programs designed to provide the best product to our customers.

ALLERGENIC PRODUCT CONTROL – CBA has SOP's and SSOP's as part of an Allergenic Product Control Plan in place that assure that non-allergen products are not labeled as containing allergenic product, are not co-mingled or pass across the same product surfaces without proper washed down, pre-op, and swabbing of equipment utilized to test for specific allergen residues being left over.

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AMR – CBA does not produce or use AMR (Advanced Meat Recovery) products

LFTB – CBA does not utilize LFTB (Lean Finely Textured Beef) in any of our products.

Sincerely,

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