January 2, 2019

Dear Valued Customer:

Harris Ranch Beef Company (HRBC; Est. #783) is a functionally-integrated beef company committed to producing safe, wholesome beef products of the highest quality. We are a federally inspected establishment that operates under the principles and procedures outlined in our written HACCP and SSOP programs that simultaneously assure compliance with all relevant USDA-FSIS regulatory requirements such as:

- HACCP and SSOP regulations 9CFR416 and 417
- *E. coli* Biotype 1 Testing and Salmonella Performance Standard 9CFR 310.25
- HACCP Annual Reassessment 9CFR 417.4(a)(3). The annual reassessment is effective January of each calendar year and includes reassessment of both *E. coli* O157:H7 and non-O157 STEC.

Harris Ranch's unique production model affords us direct control over our raw materials (i.e., cattle), not commonly experienced in the beef industry. Our sister company, Harris Feeding Company (HFC) employs several technologies designed to reduce the prevalence of *E. coli* O157:H7 in live cattle. While at HFC, cattle are fed Bovamine®, a direct-fed microbial, which has demonstrated a propensity to reduce the fecal shedding of *E. coli* O157:H7. Furthermore, all cattle trucks are washed in a state-of-the-art truck wash between each load of cattle transported to HRBC thereby reducing the possibility of cross-contamination across loads of cattle. In totality, these pre-harvest pathogen mitigation strategies reduce the pathogenic burden entering HRBC's facility; subsequently enhancing our ability to preclude the occurrence of pathogenic organisms on our beef products.

Within the animal-to-carcass conversion process, Harris Ranch incorporates multiple hurdle intervention technology which directs the application of multiple-sequential, antimicrobial interventions thus providing synergistic microbial reduction on the carcass or cut surface. HRBC's intervention system includes hock pasteurization, hot water pre-evisceration, pattern-focused organic acid application, carcass hot water pasteurization, carcass organic acid spray and rapid carcass chilling in conjunction with antibacterial spray chill application. Our hot water pasteurization and carcass organic acid spray are validated pathogen interventions, classified as a Critical Control Point in our HACCP Plan. Additionally, HRBC has identified our carcass chilling process and zero tolerance inspection as CCPs. Other hurdles used at HRBC include lactic acid treatment of primals, subprimals, and trimmings during the fabrication process. All antimicrobial interventions employed at HRBC have demonstrated efficacy against enteric pathogens, including *E. coli* O157:H7, Non-O157 (O26, O45, O103, O111, O121 & O145) Shiga toxin-producing *E. coli* (STEC) and *Salmonella*.

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Harris Ranch's vacuum packaged subprimals have not been co-mingled due to direct product to product contact in a container and are microbiologically independent. The product contained within an individual vacuum package (single or multiple pieces) is considered a 'lot'.

Additionally, Harris Ranch's vacuum packaged products are intended for intact use and Harris Ranch expects all customers to address the specific usage of products in their HACCP plans (i.e. intact or non-intact).

All raw ground beef component testing for *E. coli* O157:H7 presence is facilitated utilizing methodologies equivalent or superior to N60 surface excision. Harris Ranch employs the industry's most conservative microbiological lotting scheme – single combo bin or single pallet of boxed trim – subsequently enhancing sensitivity and probability of detecting pathogenic organisms, if in fact, they are present. Microbiological sublot integrity is maintained regardless if tested products are consumed within HRBC's internal grinding operation or shipped to outside customers for use in raw ground beef production. Variety meat items commonly utilized in ground beef manufacturing (i.e., head meat, cheek meat, heart, tongue root trim, and weasand meat), are also tested for the presence of *E. coli* O157:H7 utilizing N60 methodology. All HRBC *E. coli* O157:H7 samples are sent to an accredited 3rd party laboratory where they are screened for the presence of the organism with an AOAC approved immunoassay or PCR methodology. HRBC utilizes test and hold for all products tested for *E. coli* O157:H7 pending negative results. For HRBC customers who request *E. coli* O157:H7 testing, a Certificate of Analysis (COA) is provided depicting negative results and the corresponding test methodology.

Harris Ranch follows FSIS' Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers (May 2012) when determining a high event period (HEP). During an Event Day, HRBC will direct the positive microbiological sublots to a full-lethality process, inedible rendering or landfill. Harris Ranch maintains control of the entire day's production until that day's *E. coli* O157:H7 results are received. During an Event Day, HRBC will conduct an investigation to determine if previously tested negative trimmings and subprimals or boxed beef from the same production timeframe may be affected. Those products that HRBC determines to be affected will be diverted to a full lethality process or otherwise destroyed.

In the event of an emergency, written Recall Procedures are in place to provide prompt identification and tracking of all affected products while assuring proper notification to customers. Mock recalls are performed at least twice annually. HRBC also has a written Food Defense program to assure systems are in place to prevent the risk of intentional food contamination.

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Other pre-requisite programs in place include but are not limited to:

- Pest Control: Licensed Technician
- Allergen Control: Written procedures to assure allergens are controlled within our facility
- Employee training: Upon hire and ongoing training that includes, but is not limited to: HACCP, SSOP, GMP's, Product Handling, Employee Hygiene, etc.
- Metal Detection: Utilized on boneless beef trimmings, ground product, fully cooked products and portion control products
- Animal Welfare and Handling (Based on AMI's Recommended Animal Handling Guide, July 2013, Rev. 1)
- Ruminant Feed Ban: Meat offered for sale is derived from cattle that have been fed materials in compliance with the FDA regulation 21 CFR 589.2000.
- Residue Control: HRBC complies with FSIS Directive 10,800.1(rev.1), March 03, 2014 "Residue Sampling. Testing and Other Verification Procedures under the National Residue Program for Meat and Poultry Products.

Specified Risk Materials (SRM's) are handled in accordance with all USDA-FSIS regulatory requirements, including the SRM Final Rule, "Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle (and subsequently published "Requirements for the Disposition of Cattle that Become Non-Ambulatory Disabled Following Ante-Mortem Inspection on March 18, 2009 to augment the previous rule); "Disposition of Non-Ambulatory Disabled Cattle, FSIS Notice 74-10 Issued 12/22/10"; Prohibition of the Use of Certain Stunning Devices Used To Immobilize Cattle During Slaughter" issued in the Federal Register July 13, 2007; effective on October 1, 2007 specifically listed as:

1. *Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle*
   a. *Non-ambulatory disabled animals are unfit for human food:*
      HRBC does not accept or harvest non-ambulatory animals.
   b. *All cattle – tonsils and distal ileum are inedible:*
      The tonsils are removed from all carcasses.
      Eighty inches of the small intestine including the distal ileum, as measured from the ileocecal junction is discarded to inedible rendering.
   c. *Cattle 30 months and older – the brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column are inedible (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae and the wings of the sacrum):*
      HRBC relies on cattle birth records and/or dentition to determine the age of all cattle and segregates those identified as 30 months and older. Our segregation procedures assure that the SRM's have been removed and properly disposed of as inedible. Bone-in products (that include the vertebral column) are produced from animals that

are under 30 months of age. If it is necessary to produce bone-in product from animals that are 30 months of age and older, specific written procedures are followed to control the SRM (vertebral column) as required by USDA-FSIS regulatory requirements, including proper documentation with customer order. In addition to meeting USDA-FSIS regulatory requirements for SRM, some customers consider the spinal cord, dura and dorsal root ganglia as an SRM in cattle of all ages, therefore, HRBC also removes the spinal cord, sheath (dura) and dorsal root ganglia (DRG) that extends from the spinal channel on all carcasses.

2. *Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems:*
   By definition, HRBC does not produce AMR product; however, HRBC utilizes soft tissue separation equipment to recover meat from soft tissues (excluding bones from the vertebral column). This product is segregated and only used in the production of product intended for further processing (i.e. cooking).
3. *Prohibition of the Use of Certain Stunning Devices to Immobilize Cattle During Stunning:*
   HRBC does not utilize air injected stunning equipment.

As required under 9 CFR 417.4(a)(3), HRBC has reassessed its HACCP Plan for the SRM Final Rule effective October 1, 2007.

The Final Rule of mandatory Country of Origin Labeling (COOL) was repealed on December 18, 2015 for both muscle cuts and ground beef. All whole muscle and ground beef products produced by HRBC are "Product of USA" as defined by USDA-FSIS Food Standards and Labeling Policy Book. This declaration can also be found on the label of our products, which state, "Product of USA".

Harris Ranch Beef Company is BRC certificated and is also audited annually by a 3rd party for Animal Welfare, SRM's and Verification/Validation of *E. coli* O157:H7 CCPs/interventions and testing (N60).

Harris Ranch Beef Company is committed to producing the safest and highest quality products possible. All programs are available for review onsite. If you have any questions or need clarification pertaining to the aforementioned information, please, do not hesitate contacting me.

Sincerely,

Curtis Pittman
Director of Food Safety & Quality Assurance

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