



NEBRASKA BEEF, LTD.

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(402) 733-1711

January 7, 2019

HACCP Food Safety Letter of Guaranty

Dear Valued Customer:

Nebraska Beef hereby states that each and every edible article contained in and comprising each shipment, is guaranteed at the time and place of such shipment, to be not adulterated or misbranded within the meaning of the U.S. Federal Meat Inspection Act and the U.S. Federal Food, Drug and Cosmetic Act. The programs and initiatives implemented and maintained within our Food safety system are as follows;

- Nebraska Beef is a USDA inspected establishment (EST# 19336) and is eligible to export to over 13 countries including both Canada and Mexico.
- The HACCP process descriptions utilized at NB are “Beef Slaughter” and “Raw—Not Ground.” Both HACCP plans have been validated by in-plant scientific studies with on-going verification procedures conducted daily. These HACCP plans are maintained on file within our establishment and are available for in-plant customer review upon request and visitation.
- Nebraska Beef utilizes a total of eight (8) antimicrobial intervention cabinets from hide off carcasses, through the finishing of whole muscle and beef trim fabrication. Each intervention treatment is validated to reduce *E. coli* O157:H7, Non O157 STEC, and *Salmonella* to below detectable levels. Four (4) of the eight treatments are identified as critical control points (CCP) in the HACCP Plan.
- The finished products provided are single ingredient raw beef items (various cuts) packed in boxes or corrugated combos. All of these raw beef items meet the USDA definition of the “Natural” claim in that it contains no artificial ingredients and is minimally processed.
- Our establishment has a contingency plan that covers continuity of operations.
- No Big 8 allergens are contained within the single ingredient raw beef items supplied.
- All single ingredient raw beef is Gluten-Free.
- Daily Generic *E. coli* testing of carcasses per 9 CFR 310.
- Sanitation Performance Standards per 9 CFR 416. 1 through 416.6.
- Sanitation Standard Operating Procedures (SSOP) per 9 CFR 416. 11 through 416.16.
- Hazard Analysis and Critical Control Points Systems (HACCP) per 9 CFR 417.

- Routine Salmonella testing conducted during validation periods, and regularly by USDA, FSIS pathogen sampling protocols.
- Reassessment of HACCP system performed annually as required by 9 CFR 417.4 (a) (3), when there is an occurrence of unforeseen hazards, and in response to new USDA and/or company policies that may impact the food safety process. NOTE: USDA Policies are Regulations, Directives, Notices, memorandums, etc.
- Non-ambulatory disabled livestock (downers) are ineligible for slaughter.
- NB utilizes only captive bolt stunning equipment—no air-injected stunners are used.
- NB implements a program which ensures the proper removal, segregation, and disposal of all Specified Risk Materials (SRM) of bovine animals in accordance with 9 CFR 310.22.
- The vertebral columns of all ≥ 30 months of age cattle are removed during the fabrication process, which ensures that no bone in Beef Loin and Ribs from ≥ 30 months of age cattle enters into commerce (specifically—feather, chine, and vertebral bones).
- Product prepared using advanced meat recovery system (AMR) is properly labeled and tested daily for *E. coli* O157:H7, calcium content, and added iron per 9 CFR 318.24. NB does not harvest mechanically separated meat from the skull and vertebral column of bovine animals aged 30 months or older.
- 50/50 Beef Trimmings are produced at 50% Lean $\pm 2\%$ and is derived from cattle of domestic origin only (Product of USA). Combos are standard 46' in height with an average weight of 2,000 lbs. and boxed 50/50 trimmings are packaged in industry standard 60 lb. wax lined boxes (acceptable for product contact).
- Utilize a 2-combo lot at N=75 sampling plan for all raw beef intended for grinding under strictly enforced “Test and Hold” procedures.
- High Event Program (HEP)—based on the 5% probability table as outlined in the August 2014 FSIS compliance guidance document for Sampling of Beef Trimmings, when more than 5% of beef trim lots intended for non-intact use test presumptive positive, all trim (Intended for Non-Intact Use) produced on that day will be diverted from non-intact use and rendered a proper disposition per FSIS Directive 10,010.1. In addition, all whole muscle associated with presumptive positive trim lots will be retained and either tested for *E. coli* STEC pathogens or diverted to cooking under strict controls.
- Physical lots are defined as one day’s production of like/grade product. Example: *Prime Boneless Ribeye’s produced on 5/1/17—1 Lot, Choice Boneless Ribeye’s produced on 5/1/17—1 Lot, Select Boneless Ribeye’s produced on 5/1/17—1 Lot, etc.* However, each individually packaged primal and/or sub primal has gone through a validated intervention and has not been “commingled” before packaging. Thus, each individual package is microbiologically independent in accordance with USDA, FSIS Guidelines. Note: in the rare event that unavoidable commingling of sub-primals occurs at our establishment, we maintain a re-conditioning procedure that includes passing these cuts through a validated anti-microbial treatment and ensuring that no commingling occurs after this treatment.
- Whole muscle products packed in individually cryovac packages are not intended for conversion to non-intact products unless a COA is provided (upon customer

request only). Subsequently, all Bill of Ladings are stamped with the phrase, “*Our Primal and sub-primal Cuts of Beef are intended for Raw Intact Use Only.*” However, if a customer makes a conscious decision to convert either the sub-primals or bench trim to non-intact items, there is an expectation that they utilize either a validated anti-microbial intervention or additional quality step in their process to address the relative pathogens of concern.

- All packaging materials are acceptable food grade wrappings. Supplier guarantees and SDS are part of our supplier approval program per GFSI standards and are on file at our establishment.
- All pathogen testing of beef trim performed by a third-party laboratory utilizing the PCR BAX method.
- All beef trim test results are daily reviewed for anomalies and used to investigate potential process control issues.
- Quarterly verification testing for *E. coli* O157:H7 on trim and variety meats.
- Utilization of organic acid (lactic) interventions on Carcasses, variety meats, trim, and whole muscle that are validated to reduce *E. coli* O157:H7, Non-O157 STEC, and *Salmonella* to below detectable levels.
- Utilization of a hot water pasteurization treatment on carcasses that is validated to reduce *E. coli* O157:H7, Non-O157 STEC, and *Salmonella* to below detectable levels.
- All products are refrigerated throughout the process in order to maintain cold chain and prevent bacterial proliferation.
- All cattle slaughtered by NB have been fed rations that do not contain prohibited meat and bone meal per 21 CFR 589.2000/2001. Our establishment maintains Livestock Owner certificates signed by every cattle supplier certifying compliance.
- Chemical Residues (antibiotics, hormones etc.)—All cattle suppliers issue a signed Livestock Owner Certificate stating that all veterinarian treatments are administered in prescribed amounts, by trained individuals, and proper withdrawal times are strictly adhered to. USDA, FSIS conducts weekly residue sampling at our facility to verify compliance.
- Blood collection methods are compliant with 9 CFR 310.20.
- NB has developed, and daily implements a written program consistent with a systematic approach to the humane handling of all livestock. The program meets all requirements of both the NAMI guidelines and the Humane Slaughter Act and is audited annually by an independent third-party auditing firm. In addition, NB maintains on staff two (2) PAACO Certified auditors who are responsible for proper Animal Welfare oversight.
- NB complies with FDA/USDA/AMS food security requirements for both domestic and international sales. Compliance with the Public Health Security & Bioterrorism Preparedness & Response Act of 2002.
- NB maintains a written Food Defense program that is assessed annually.
- Maintains a written comprehensive recall strategy that conducts traceability exercises twice a year (trace forward and trace back).
- Annual third-party audits are conducted for Animal Welfare and GFSI (BRC Certified—Grade AA—Highest rating possible).

- NB slaughters only cattle of domestic origin. Pursuant to the COOL mandate outlined in 7 CFR § 65.500, all covered commodities are labeled “*Born, Raised, and Harvested in the United States.*”
- NB hiring practices meets all requirements of the California Transparency in supply Chains Act of 2010.
- Nebraska Beef fully complies with California’s Proposition 65 (Safe Drinking Water and Toxic Enforcement Act) in that all single ingredient raw beef items produced by NB does not contain any chemicals listed on the Proposition 65 list of chemicals.
- NB has developed both sustainability and environmental impact policies that are strictly implemented and maintained daily.
- Pursuant to section 5.4.2 of the GFSI (BRC) standards for food safety and quality, a vulnerability assessment was conducted to assign a risk factor for weaknesses in the supply chain in order to prevent food fraud. This assessment considered controls in place, with measured assurances of the controls along with historical evidence. The result rendered a low risk for fraud.
- Emergency Contacts are as follows;

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Our mission at Nebraska Beef is a commitment to food safety and a dedication to the production of the highest quality beef that is both safe and wholesome for our customers and their consumers. As a customer of Nebraska Beef, we thank you for your interest and continued business and if there is any additional information you need, please do not hesitate to contact me.

Sincerely,

Emile Randazzo

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 VP of Regulatory Affairs
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