



500 S. Washington Street
Green Bay, WI 54301

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GIBBON PACKING COMPANY, LLC. Est. #5511, Gibbon, NE
LONG PRAIRIE PAKING COMPANY, LLC Est. #253, Long Prairie, MN
CIMPL'S MEAT COMPANY, LLC. Est. #2460, Yankton, SD
GREEN BAY DRESSED BEEF, Est. #410, Green Bay, WI

January 14, 2020

American Foods Group, LLC has been operating under a Pathogen Reduction/Hazard Analysis and Critical Control Point (HACCP) system. We implemented Sanitation Standard Operating Procedures and generic E.coli testing performance criteria in January, 1997, followed by the implementation of PR/HACCP in January of 1998, in all of our beef production and processing facilities in accordance with 9 CFR parts 417; 416.11; 416.16; and 310.25. We reassess our HACCP program annually to assure validation of our HACCP program. We also conduct multiple annual verifications via 3rd party audits.

In accordance with the requirements of 9 CFR 310.25(a), we designed a carcass sampling plan that exceeds USDA/FSIS's requirements. We have implemented a multi-hurdle concept in pathogen reduction by using a number of validated pathogen intervention systems including steam or hot water pasteurization, organic acid rinse as our CCPs. These interventions are validated to eliminate or reduce to acceptable levels pathogens of public concern, such as E.coli O157:H7, STECS and Salmonella. In addition, we also use several other validated pathogen interventions including steam vacuums and a pre-evisceration wash, in tandem order. American Foods Group has always been a pioneer in food safety and quality. American Foods Group is in compliance with FSIS Directive 6420.2 regarding zero tolerance. In accordance to FSIS Notice 44.02 regarding E coli O157:H7, we have reassessed our HACCP program and considered E. coli O157:H7 as a hazard reasonably likely to occur in raw beef product destined for grinding and non-intact use. Therefore, we established a number of CCPs to address detection, and destruction of E. coli O157:H7 to below detectable limits. We have reassessed our HACCP plan based on Notice 65/07. American Foods Group uses robust N=60 sampling plan for boneless beef trimmings and non-intact product in accordance with FSIS Notice 65-07 and 66-07. In conjunction with N60+, AFG uses state of the art Multiplex PCR with sensitivity to detect one E. coli cell in 65 grams of sample. Furthermore, in accordance with USDA/FSIS Notice 05-09, we have implemented finished product interventions on trimming and primal/sub-primals. AFG has established a stringent statistically based Event Day (Hot Day) program in all of our plants. Should an "event day" occur, we have measures in place that prevent affected event day product from being shipped to our customers. Disposition of the affected product from the event day may be subject to further action based on an investigation of the cause.

As of June 4, 2012 USDA/FSIS is not requiring testing of Non O157 STEC relevant serogroups by Harvest facilities producing boneless trimmings, according to the USDA /FSIS Notice 29-12. In compliance with Notice 29-12 and 40-12 American Foods Group is not testing for Non O157 STEC. However, we will collect relevant and adequate data on the effectiveness of our interventions against Non O157 STEC to support that our existing interventions and process control programs are equally effective against the six relevant non-O157 STEC serogroups (O26, O45, O103, O111, O121, and O145).

American Foods Group operates in accordance with all USDA/FSIS regulations and requirements of Federal Register 21 CFR parts 589.2000 and 21CFR part 589.2001. We have established and implemented programs and policies approved by USDA/FSIS.



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Humane Handling – American Foods Group is in full compliance with all provision of humane handling rules and regulations including 9 CFR 313.

Downer Animals – American Foods Group does not harvest non-ambulatory (downer animals) for human consumption. We are in compliance with FSIS Notice 56-07, the final regulation for non-ambulatory disabled cattle and specified risk materials.

Specified Risk Material – At American Foods Group, we remove, segregate, and properly dispose of all Specified Risk Materials (SRM's), prohibited by Notice 4-04, Notice 56-07 (the final regulations for non-ambulatory disabled cattle and specified risk materials) and Federal Register 9 CFR, parts 301 and 309, including tonsils, small intestine and spinal cord of all animals as well as skull, eyes, brain, vertebral column and dorsal root ganglia, of cattle 30 months and older.

Advanced Meat Recovery – American Foods Group, LLC is producing AMR in some of our facilities. Advanced meat recovery (AMR) is produced in accordance with all USDA/FSIS applicable rules and regulations.

Ground Beef – At American Foods Group, ground beef is manufactured from boneless beef trimming that is sampled for E. coli O157:H7, and samples were found negative.

American Foods Group continues to make every effort to minimize pathogenic bacterial contamination with the existing technology, but neither American Foods Group, nor anyone else is able to guarantee pathogen free raw materials.

We enclose an executed copy of our Continuing Guarantee, which supports our commitment to deliver you a merchantable, non-adulterated and safe product. It is our policy for purposes of uniformity and efficiency to provide only this form of continuing guarantee.

Very truly yours,

Ali Mohseni
EVP/Chief Food Safety Officer



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CONTINUING GUARANTEE

American Foods Group, LLC (“Seller”) guarantees that each and every article of food delivered to or for (“Buyer”), as of the delivery date: (a) is not adulterated or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act (the “FDC Act”), the Federal Meat Inspection Act and the Poultry Products Inspection Act, in each case if applicable; (b) is not an article which, under the provisions of sections 404 or 405 of the FDC Act, if applicable, may not be introduced into interstate commerce; and (c) if the article contains a color additive, the color additive was from a batch certified in accordance with the FCD Act, if applicable. This guaranty does not apply to any article subjected to improper use, handling or storage after delivery or to use contrary to or inconsistent with Seller’s instructions. Seller shall not be liable for any breach of this guaranty arising out of or resulting from Seller’s compliance with Buyer’s specifications, labeling instructions or other requirements.

EXCEPT FOR THE EXPRESS WARRANTIES SET FORTH ABOVE AND THOSE IN A WRITING SIGNED BY AN OFFICER OF SELLER AND BUYER, SELLER MAKES NO REPRESENTATION OR WARRANTY WHATSOEVER WITH RESPECT TO THE ARTICLES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. IN NO EVENT SHALL SELLER BE LIABLE TO BUYER OR ANY THIRD PARTY FOR ANY LOST PROFITS OR REVENUES, DIMINUTION IN VALUE, OR ANY OTHER CONSEQUENTIAL, INDIRECT, INCIDENTAL OR SPECIAL DAMAGES.

This guaranty shall remain in effect until terminated by Seller on written notice to Buyer, provided, however, that termination shall not be effective as to any orders accepted by Seller prior to termination. This guaranty supersedes and replaces any prior guaranties given by Seller.

American Foods Group, LLC

A handwritten signature in cursive script that reads "Ali Mohseni".

Ali Mohseni
EVP and Chief Food Safety Officer

Date: 1/14/2020