

January 2, 2020

RE: HACCP Food Safety and Letter of Guarantee

To our valued customers:

Byron Center Meats, Inc. is a processor of Meats and Poultry as a USDA inspected facility, Establishment No. 02592 M, 02592 P. We are also certified “USDA Organic” through “ECOCERT ICO”. As such, the rules and regulations of the USDA govern all operations to include FDA regulatory requirements and the National Organic Program “NOP”. Also State and local municipality requirements for good business practices and or water requirements are applicable and incorporated into our practices.

Byron Center Meats, Inc. implemented the USDA Pathogen Reduction Hazard Analysis Critical Control Point (PR/HACCP) regulation in January 1998 and the USDA Standard Sanitation Operating Procedures (“SSOP’s”) in 1997. Strict supplier approval adherence, validated critical control points to prevent the outgrowth of pathogens of concern and the implementation of validated interventions that are designed to eliminate or reduce pathogens of concern below detectable levels have all been implemented and verified.

In recognition of the Non-O157 Shiga Toxin Producing Escherichia coli (STEC) known as the Big Six and the identification of them as pathogens of concern by USDA FSIS, we have taken steps to incorporate them into our validation process at Byron Center Meats. These pathogens are already being addressed through our current validated process that has been recognized by USDA FSIA and the industry as being effective on these pathogens as they are on EColi 0157:H7.

Based on USDA FSIS guidance and several public comments by FSIS, our position is that we will not be implementing testing for the top 6 STEC’s until more can be learned of the prevalence of STEC’s are shown to be a food safety concern in fed beef.

We utilize an external Sanitation contractor that ensures complete cleaning daily from top to bottom and by continual testing of the facility’s sanitation. We also monitor our SSOP program by on-going verification and effectiveness of the SSOP program by a Pre-Operational inspection prior to production and through Third Party indicator organism testing with on-going Target limits and action levels for continual improvement and evaluation of our system.

Our facility utilizes through procedure for on-going monitoring as a Critical Control Point / periodic calibration of Facility temperature and product monitoring as a Control Point to ensure compliance with FDA 21 CFR and control of Pathogen growth.

Though not a Critical Control Point through our hazard analysis, BCM has elected to incorporate additional safeguards for the detection of Metal containments as a GMP in packaged products to ensure customer safety.

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Prior Revision: 1/2/20

5 U.S.C. Sec. 552 (b) (4)

Approved by: Aaron Veldheer

We use two key validated Interventions to reduce Ecoli 0157 and Non-0157 STEC (Big Six) loads for our Beef Carcass receiving and for Primal's intended for further processing. One is our "ASC" (Acidified Sodium Chlorite) and the other is Citric Acid. Either of which are approved for our "Organic" certified processing program. Both are part of our On-going validation program to ensure targets are met and exceeded to provide wholesome products to our customers.

As stated above we only utilize two key validated intervention Ecoli loading processes and have not used Ammonium hydroxide though it is a recognized process under USDA regulations, we at Byron Center Meats have not utilized it in our processing practices.

Part of this On-going validation is our periodic Microbial Monitoring of suppliers of USDA Inspected Beef Carcass, which we swab the Brisket, Flank and inside round for a total surface area of 4000 cm² demonstrating that Escherichia coli 0157:H7 is not detectable and or key indicators for Ecoli (generic), and other indicator organisms such as APC and Coli form show reductions or are below acceptable target limits. We also recognize the high shedding months of May through September and adjust our program as needed. We also request the same from our suppliers with test results to be provided demonstrating it at harvest.

Through our system of Food Safety and part of our Pre-requisite programs and procedures, we receive and process only Ground Beef products, Primals, Sub-Primals and trim that have a "LOG" (Letter of Guarantee) through accepted supply sources and/or have a "COA" (Certificate of Analysis) accompanied as being Ecoli 0157:H7 free by AOAC Method No. 2005.04 from Certified ISO 17025 Labs or as stated on their LOG that have gone through the "Test and Hold" program for the analysis process. Any trims or ground products produced internally will be processed under our "Test and Hold" program by batch Lot for its primal / trim manufacture's date(s) using an N-60 Sample method (Trim or Composite as appropriate) with a sample size of 375 grams. Additional testing for Salmonella has been elected to be included periodically or on each batch as an additional Sanitary Condition / Food Safety check of our process.

Microbials, Yeast, Molds, bacteria's and other indicator organism detections as appropriate are part of our on-going Environmental monitoring on a monthly / quarterly basis for evaluation of raw primal suppliers, storage, processes, processed and finished goods at BCM. This helps us to ensure SSOP procedures are functioning as intended and as a commitment to providing safe wholesome products to our customers.

Products produced at Byron Center Meats, Inc. comply with all USDA requirements for the production, sale and distribution of meat products. As such we also require compliance from our suppliers for "Letter of Guarantee / HACCP Food Safety" from Raw inspected product to Packaging for Food safe contact. Suppliers of Raw inspected product sources are also verified for Country of Origin and documented by shipment. In the case of Ground Beef, Byron Center meats only accepts product with a "COA" and/or "LOG" from our

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suppliers as going through the “Test and Hold” process to have been determined to be negative for EColi.

As a processor of Meat Products, we participate in SRM and BSE programs. We require all supplied products to comply and have compliance letters on file and current with each.

We utilize a licensed external Pest Control facility and also take ownership internally to protect our customers. We also use an Event Day Program and perform Mock Recalls a minimum of semi-annually to ensure the integrity of our systems.

In addition, our company complies with all Current Good Manufacturing Practices, Continuing Employee training Food safety programs, Pre-requisite and Standard Operating Procedures, Allergen / Restricted ingredient controls, Chemical separation / controls, Food defense procedures and overall Quality Programs to ensure compliance and continual improvement.

Our systems are also verified and validated through on-going Food Safety audits by USDA, Third Party audits by Silliker and Ecocert organic, voluntary program audits for our Certified Angus Beef (CAB) and Imperial Wagyu Beef (American Kobe) programs. These audits and Process change-overs / separations help us to continually work with and improve our operations by their valued feedback and our customer’s.

Byron Center Meats, Inc. believes our food safety program is proactive to help set the standard for the industry, but at the same time, neither we, nor for that matter, anyone is able to guarantee pathogen free raw materials. Accordingly, we want to reiterate the importance of proper handling and cooking of raw meat products by you and your customers.

Best regards,

Aaron Veldheer Quality Manager (Food Safety Team member / Sanitarian / HACCP Coordinator)

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