January 4, 2021

Specified Risk Material Statement

Dear Customer:

STX Beef Company has reviewed its procedures and protocols and reassessed its Hazard Analysis to ensure compliance with USDA's Food Safety Inspection Service's (FSIS) Final Rule published in the Federal Register on July 13, 2007 and effective October 1, 2007. The following documents and regulatory requirements have been reviewed prior to our reassessment:

Prohibition of the use of Specified Risk Materials in Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Animals; January 12, 2004; [Docket No. 03-025IF]; Meat Produced by Advanced Meat/Bone Separation Machinery and Meat Recovery (AMR) Systems; January 12, 2004; [Docket No. 03-038IF]; Prohibition of the Use of certain Stunning Devices Used to Immobilize Cattle During Slaughter; January 12, 2004; [Docket No. 01-033IF]; Awareness Meeting Regarding New Regulation that Prohibit Non-Ambulatory Disabled Cattle and the use of Certain Materials from Cattle for Human Food; FSIS Notice 4-04, January 9, 2004; Interim Guidance for Non-Ambulatory Disabled Cattle and Age determination; FSIS Notice 5-04, January 12, 2004; Questions and Answers for FSIS Notice 4-04 regarding FSIS's BSE Regulations; FSIS Notice 7-04, January 14, 2004; Verification Instructions For The Interim Final Rule Regarding Specified Risk Materials (SRMs) In Cattle; FSIS Notice 9-04, January 23, 2004; Questions and Answers, Regarding the Age Determination of Cattle and Sanitation; FSIS Notice 10-2004, January 29, 2004; Bovine Spongiform Encephalopathy (BSE); Issues Relating to Tonsils and Brain Collection; FSIS Notice 50-04, October 7, 2004; Verification Instructions for the SRM Amendment to 9 CFR 310.22(a)(3) Regarding Beef Small Intestines; FSIS Notice 58-05, September 14, 2005; Verification Activities at Establishments that Transport or Receive Cattle Carcasses or Parts with Vertebral Columns that Contain Specified Risk Materials (SRMs); FSIS Notice 68-05, October 6, 2005; Re-Examination of Bovine that become Non-Ambulatory after Passing Ante-Mortem Inspection; FSIS Notice 5-06, January 18, 2006; Final Regulations for Non-Ambulatory Disabled Cattle and Specified Risk Materials (SRMs); FSIS Notice 56-07, August 31, 2007; Sample Collection From Cattle Under the Bovine Spongiform Encephalopathy (BSE) Ongoing Surveillance Program FSIS Notice 13-12, February 14, 2012

Based on the information provided above and a review of our hazard analysis, we did consider BSE as a potential hazard, but determined that it is not reasonably likely to occur. This determination is supported by the fact that there have been only four positive native BSE animals as of May 2012. Additionally, based on the Harvard Risk Assessment Study[1], we determined that BSE is not a reasonably likely to occur food safety hazard in the United States. Therefore, based on this information, our internal programs and the ongoing USDA BSE Surveillance testing, we concluded that BSE is not reasonably likely to occur.

As requested, we also addressed Specified Risk Materials (SRM's) in the hazard analysis, and determined that since BSE is not likely to occur that the SRM control programs are best addressed as stand-alone plant policies, not in the HACCP program. STX Beef Company does not currently employee advanced meat recovery (AMR) in any of its processes.

1. STX Beef Company has implemented a policy to condemn and dispose of all non-ambulatory disabled cattle. We understand that all non-ambulatory disabled livestock, including cattle, are now defined in 9CFR 309.2(b) as livestock that cannot rise from a recumbent position or that

[1] http://www.fsis.usda.gov/PDF/BSE_Risk_Assess_ExecSumm_2005.pdf

cannot walk, including, but not limited to, those with broken appendages, severed tendons or ligaments, nerve paralysis, fractured vertebral columns or metabolic conditions. These non-ambulatory disabled cattle will be handled humanely and disposed of properly.

2. We have implemented a policy to ensure that cattle selected by APHIS for BSE surveillance testing that are not non-ambulatory disabled will be held until the results of the test are received and are negative or it will be completely and properly disposed of to ensure that no products from the tested cattle enter the food system. We understand that a negative test result must be received before FSIS will "inspect and pass" the carcass.
3. We will not use a captive bolt stunner that injects compressed air into the cranium at the end of the penetration cycle to stun cattle.
4. The dentition guidelines provided in FSIS Notice 5-04 will be used to determine the age of the cattle, and those cattle identified as 30 months or older will be segregated and processed appropriately to ensure that the SRM's are properly removed and disposed.
5. The tonsils, and spinal cord of all cattle, regardless of age, will be removed on the slaughter floor and properly disposed of as inedible.
6. For cattle 30 months of age and older, the head, brain, skull, eyes, and trigeminal ganglia will be removed on the slaughter floor and properly disposed of as inedible.
7. Will remove (bone-out) the vertebral column (excluding the vertebra of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum) and the dorsal root ganglia of cattle 30 months of age and older on the processing floor before reaching the main production line, and properly dispose of as inedible.
8. No bone in product is produced from animals 30 months of age and older; no carcasses or carcass parts are shipped from animals 30 months of age and older
9. We will follow the guidelines set forth in FSIS Notice 58-05 regarding the complete removal of the Distal Ileum.

Additionally, the Food and Drug Administration (FDA) banned the use of "prohibited mammalian protein" in cattle rations (i.e., ruminant meat & bone meal) for ruminant animals (CFR 589.2000). The FDA ban was implemented to prevent Bovine Spongiform Encephalopathy (BSE) into the U.S. cattle supply. All cattle suppliers to STX Beef Company are required to provide us with documentation of their compliance to the FDA ruminant feeding ban for "prohibited mammalian protein" (ruminant meat & bone meal) before these cattle will be allowed to be presented for slaughter.

As more information becomes available or as FSIS provides further clarification, we will evaluate our decisions to determine if changes are required in our program or our policies. Should you have any further questions please feel free to contact me.

Sincerely,

David Jacobs,
Quality Assurance Manager
STX BEEF COMPANY, LLC