



January 4, 2021

Commitment to Food Safety

Dear Customer,

STX Beef Company, LLC (Est. 337) is committed to food safety. We produce all products under a fully implemented Hazard Analysis and Critical Control Point (HACCP) plan that conforms to all requirements set forth in Title 9CFR Ch. III Part 417, as well as the Sanitation Standard Operating Procedures set forth in Title 9CFR Ch. III Part 416. Our food safety systems are monitored and verified by trained Quality Assurance personnel.

HACCP:

Our HACCP plan was reassessed on September 19, 2007 in response to FSIS notice 56-07 and October 26, 2007 in response to FSIS Notice 65-07 as per Title 9CFR CH III part 417. Our most current reassessment took place on March 20, 2019. Our HACCP plan is reassessed and documented at least annually as required by the regulations and anytime there are changes that effect the Hazard Analysis or through USDA findings and/or requests.

STX Beef Company uses a multiple pathogen reduction strategy that includes:

- Hide on wash
- Organic acid pre-evisceration wash
- Thermal Pasteurization (Hot water wash)-validated critical control point
- Organic Acid wash-validated critical control point.
- Pre-Fabrication Organic Acid Wash
- Subprimal Organic Acid Spray
- Raw, Ground Beef Component Organic Acid Application (Trim)

The validated critical control points: (Hot Water Pasteurization System ($\geq 190^{\circ}\text{F}$) and Lactic Acid Rinse ($\geq 2.0\%$)) are designed to reduce *E. coli O157:H7* to below detectable levels on carcass beef and have been validated by both in house data and scientific data. Verification is an ongoing process using our trim and final ground beef sampling results and by monitoring the parameters of the CCP by the use of indicator organisms.

All carcasses and products produced during the slaughter operation and during fabrication are addressed in our HACCP plans. STX Beef Company meets the requirements of 9CFR 310 in testing of carcasses for generic *e. coli*. In response to the October 7, 2002 USDA/FSIS information on *E. coli* prevalence, we reassessed the beef slaughter and fabrication HACCP plans. *E. coli O157:H7* was previously identified as a “reasonably likely to occur” food safety hazard in the beef slaughter plan and we incorporated the new supporting data supplied by FSIS. Additionally, we have reassessed all of our HACCP plans in response to FSIS Notice 65-07 citing recent developments in the increased prevalence in *E. coli O157:H7*. Due to the ongoing high temperatures in South Texas, our internal and external data shows no increased prevalence of *E. coli* during the FSIS definition from April to September. Additionally, our ground beef is only produced from our own tested trim therefore we have ongoing daily verification of our process.

Sampling:

We have and will continue to test all raw materials intended for grinding for *E. coli O157:H7* using the N=60



testing protocol or USDA recognized equivalent method. The N=60 sampling protocol is the same one that is used by FSIS personnel for sampling. It is designed to detect hazards at very low levels. All trim combos and boxed product that are intended for grinding will use 5 combo lots – or less - for combo trim; and 166 boxes (10,000 lbs) – or less- for box trim and hearts. No tested product will be released to our customers until a negative test result has been received.

Event Management:

Utilizing the guidance document issued by FSIS in May 2012, STX Beef Company has a written “high event period” program in place outlining practices and procedures for investigating and taking appropriate actions when there is a significant increase in the frequency of positive test results. STX Beef Company has a recall plan on file that includes notification to affected customers of any product that may be adulterated or misbranded.

Audits:

STX Beef Company will be audited on an annual basis by an independent 3rd party auditor. That audit encompasses Animal Welfare, Specified Risk materials, *E. coli* O157:H7, general good manufacturing practices and SOP's. A summary of the various audit scores are available upon request. STX Beef Company is SQF (Safe Quality Food) certified and utilizes Global Food Safety Initiative audit criteria. The initial audit was completed in May of 2011 and the recertification under STX Beef Company was completed In May of 2019. Annual recertification will occur April 2021

Non-O157 Shiga Toxin *E. coli*:

On September 13, 2011, the Food Safety and Inspection Service (FSIS) released an advance copy of a *Federal Register* Notice entitled: “Shiga-Toxin Producing *Escherichia coli*” in Certain Raw Beef Products”. In this Notice, FSIS states that in addition to *E. coli* O157:H7, six other *E. coli* serogroups (O26, O45, O103, O111, O121, and O145) will be classified as adulterants within the meaning of the Federal Meat Inspection Act (FMIA). FSIS Notice 29-12 articulates the regulatory guidelines regarding these six additional STEC's and a plant's current responsibility regarding testing and verification. During our quarterly verification testing, we will sample for both *E. coli* O157:H7 and the six (6) additional STEC's.

As requested by FSIS (Notice 63-12), all of the HACCP plans (Slaughter; Raw, not ground; Raw, ground and Raw, ground chub) were reassessed. Each hazard analysis identifies *E. coli* O157:H7 and the six additional non-O157 STEC's (O26, O45, O103, O111, O121, and O145) as a food safety hazard reasonably likely to occur.

The slaughter HACCP plan had previously identified *E. coli* O157:H7 as a reasonably likely to occur hazard and now addresses the six additional STEC's as a reasonably likely to occur hazard. The Critical Control Points (CCP's) in place are designed to reduce the presence and to minimize the potential for growth. There were no changes made to the CCP's or Critical Limits for the slaughter plan based on this reassessment.

The Raw, not ground and Raw, ground HACCP plan had previously identified *E. coli* O157:H7 as a reasonably likely to occur hazard and now addresses the six additional STEC's as a reasonably likely to occur hazard. The Critical Control Points (CCP's) in place are designed to minimize the potential for growth. There were no changes made to the CCP's or Critical Limits based on this reassessment.



The Federal Register Notice, Docket No. FSIS-2010-0023 states:

“Many establishments that produce raw non-intact beef products, such as ground beef, incorporate such antimicrobial interventions as organic acid sprays in their processing. These methods should be as effective in controlling non-O157 STEC as they are in controlling E. coli O157:H7.”

Additionally, Notice 63-12 references additional scientific information that indicates that interventions that control *E. coli* O157:H7 also control the non-O157 STEC's (Geornaras et al., 2012; Kalchayanand et al., 2012)

Intended Use:

In response to FSIS Notice 81-13 STX Beef Company produces subprimal products (chucks, ribs, loins, rounds and associated cuts) that are packaged into vacuum bags and boxed. These products are NOT tested and are not intended for non-intact use such as grinding, tenderizing or injecting. STX Beef Company expects any customers who purchase vacuum packaged subprimals and utilizes these products for non-intact processes, to address their specific usage within their HACCP plan.

STX Beef Company does produce tested trim and subprimal products that are not bagged and packaged in lined boxes or combos. These tested products are intended for non-intact use, such as grinding, needle tenderizing or injection. A Certificate of Analysis is available for all tested product to be used as non-intact.

Vacuum Packaged subprimals placed into commerce are microbiologically independent and have not been comingled due to direct product to product contact inside a container

STX Beef Company, continues to improve our existing food safety programs and to consider new technologies that will enhance product safety. STX Beef Company has a recall plan on file that includes notification to affected customers of any product that may be adulterated or misbranded. Should any changes or deficiencies be found with our interventions and/or Food Safety System, you as the customer will be notified of these changes.

Sincerely,

A handwritten signature in blue ink that reads "David Jacobs".

David Jacobs,
Quality Assurance Manager
STX BEEF COMPANY, LLC