



Establishment 13 Swift Argentina S.A

QUALITY FOOD SAFETY AND REGULATORY PROGRAMS

EFFECTIVE DATE: December 24, 2019

Dear Customer,

Below you will find, along with a continuing guarantee, information which concerns the Quality, Food Safety & Regulatory Affairs programs of Establishment 13 Swift Argentina S.A.

Argentina's food safety inspection system governing the production of meat products remains equivalent to that of the United States, with the ability to export products that are safe, wholesome, unadulterated, and correctly labeled and packaged. Argentina is eligible to export raw intact, raw non-intact, and fully cooked-not shelf stable beef products to the United States.

Argentina is a member of the World Organization of Animal Health (OIE) and is recognized as a country with a negligible risk regarding the prevalence of bovine spongiform encephalopathy (BSE). USDA's Animal and Plant Health Inspection Service (APHIS), which regulates the importation of animals and animal products into the United States. In addition, APHIS has recognized Argentina as having a negligible risk for BSE in Title 9 of the United States Code of Federal Regulations (9 CFR) § 92.5.

1. SCOPE

The purpose of this is to define practices and procedures to assure consistent manufacture of a product according to a defined specification by United States.

2. GENERAL REQUIREMENTS

- All meat supplied to the company have been derived from the recognized species of meat animal (bovine) and meets APHIS approved disease-free requirements.
- Suitable for use and complying with all the requirements of the United States of America outlined in the Code of Federal Regulations (9-CFR)
- Carcass meat have passed inspection and is 'Fit-for-Human Consumption' as identified by qualified Government Veterinarian.
- All animals supplied are slaughtered, dressed and /or further processed, within Establishment premises, that have been approved currently to hold an appropriate license and/or approval from USDA, FSIS
- Ensure animals receiving, slaughter, deboning, storage and dispatch of the product is per the animal welfare and food safety polices and Directorate of Veterinary services directive.
- Our establishment meets Argentina regulatory requirements that are equivalent to the sanitation requirements identified in 9 CFR §416.



- Our certified establishment meets all regulatory requirements under 9 CFR §417. This includes a flow diagram, hazard analysis, HACCP plan for hazards identified as likely to occur, monitoring and verification activities, corrective action, reassessment, validation, and recordkeeping requirements supporting the implementation of the HACCP system. The Establishment has an FSIS equivalent HACCP and food safety system and validated plan that is reflected in the companies Standard Operating Procedures and Zero Tolerance Management plan.
- Our beef slaughter establishment conducts 100 percent monitoring of beef carcasses for the zero tolerance CCP for presence of fecal matter, ingesta, and milk. The CCP is followed by a Microbial rinse (lactic acid) that is verified and validated.
- Product must be free from below microbiological contamination. As part of the HACCP Program, our in-plant lab analyzes samples and results from Salmonella, E.coli O157:H7 and non-O157:H7 STEC samples which are collected at random throughout production and across all seasons.
- Our inspection system has a chemical residue control program, organized and administered by the national government, which includes random sampling of internal organs, fat, and muscle of carcasses for chemical residues identified by the exporting country's meat inspection authorities or by FSIS as potential contaminants.
- Only product which is free of contamination is permitted to be exported to the United States. All product is verified as wholesome.

3. HACCP/ Prerequisites

Swift Argentina S.A. is committed to producing wholesome products in accordance with all food safety and regulatory guidelines set forth by the US Department of Agriculture. Also, Swift Argentina S.A. operates under a fully implemented HACCP Plan (Hazard Analysis and Critical Control Points) which meets or exceeds requirements set forth in 9 CFR 417. Swift Argentina S.A. has identified appropriate Critical Control Points (CCP) for the process. The CCP limits are monitored at a minimum of each production day. The CCPs are validated by scientific research and internal monitoring. Furthermore, Swift Argentina S.A. has in place Sanitation Standard Operating Procedures (SSOP) that meet all requirements set forth in 9 CFR 416. Additionally, Swift Argentina S.A. has in place written supporting programs for Good Manufacturing Practices (GMPs), pest control, and, where necessary, allergen control.

4. Specified Risk Material (SRM) Guarantee

Swift Argentina S.A. has been audited by USDA FSIS. The FSIS auditors visited beef slaughter establishment to verify implementation of SENASA requirements concerning removal, segregation, and disposal of specified risk material. The auditors verified the implementation of SENASA requirements through record reviews, interviews, and direct observations made during both ante-mortem and post-mortem inspection examinations. The conclusion that SENASA requirements are being implemented properly.



The auditors verified the CCA's controls over condemned materials. The definition, isolation, and disposal of slaughter or processing wastes are provided in SENASA Circular No. 3528/2003. Slaughter and processing establishments waste are categorized into slaughter waste free of SRM, slaughter waste containing SRM, and processing waste with or without SRM. For management and disposal of each type of waste, the circular provides distinct requirements with which establishments must comply, and are verified by inspectors either through observation, record review, or both.

The FSIS auditors reviewed inspection verification records concerning the disposition of the condemned products and determined Swift Argentina S.A. has an equivalent program.

5. Animal Welfare

Swift Argentina S.A is committed to meeting all applicable regulations that pertain to animal handling and the proper care of animals. Our commitment includes regular welfare checks and verification's regular third party audits by outside experts, and rigorous internal audits.

6. PROCEDURE: MICROBIOLOGICAL SAMPLING

All products supplied to US are subjected to positive release system of the company. Following standing instructions should be followed during all sampling protocols as well as product release. Sample collection for the mandatory tests will be done daily as per the standing sampling protocols.

6.1 Sample selection

Samples should be only taken from cuts and trimmings that are identified to be used as for US export. Sampling stations are in Deboning. Sampling done as per the lot identification and sampling procedure in place.

6.1a E Coli/STEC/Salmonella

SENASA has developed a Salmonella official sampling and testing program for chilled beef carcasses that is consistent with the FSIS performance standards in 9 CFR § 310.25(b). The FSIS auditors accompanied and observed in-plant inspection personnel Swift Argentina S.A sample collection methodology for Salmonella in one of the audited slaughter establishments, which was performed in accordance with SENASA requirements.

SENASA has identified E. coli O157:H7 and six additional non-O157 STECs in beef manufacturing trimmings as adulterants. SENASA Circular No. 4210B provides instructions to inspection personnel and certified establishments regarding definition of a production lot. The FSIS auditors verified each establishment's lot definitions to ensure each lot as defined by the certified establishments met SENASA requirements including; represent a defined production unit that is clearly identified from the other units, produced within a certain time interval, traceable from source of animals to end product through distribution, and have microbiological independence between each production lot.



SENASA requires Swift Argentina S.A to have in place documents including sampling methodology and testing results. Swift Argentina S.A is certified as eligible to export to the United States and required to conduct routine sampling of beef manufacturing trimmings in accordance with N60 methodology consistent with current FSIS guidelines (size of samples, number of samples taken per container in the lot, external surface of carcass, etc.). In-plant inspection personnel also conduct independent N60 official verification sampling. SENASA has provided instructions to its inspection personnel for N60 sample collection methodology and submission procedures, interpretation of results, and any enforcement strategies following an STEC positive result that include immediate corrective actions, followed by HACCP reassessment, and follow-up sampling and testing.

During the FSIS onsite audit it was observed and verified that proper N60 sample collection methodology by the establishment's quality control personnel and in-plant inspection personnel. Test and hold protocols for each lot of product destined for export to the United States. If the product tests positive for either E. coli O157:H7 or non-O157 STECs, it is not eligible for export to the United States. FSIS has identified the programs as equivalent.

7. Recall and Traceability

Recall procedures are in place such that in emergency, all products that are produced can be traced as product codes and volumes shipped by the location shipped to. Swift Argentina S.A has a Recall Team made up of personnel identified according to the necessary disciplines needed for prompt action. Members of this team include Production, Sales, Technical Services, Public Affairs, and Legal.

8. Food Defense

Swift Argentina S.A is access controlled, fenced and guarded. Swift Argentina S.A operates under a fully developed and implemented Food Defense program and these procedures are reviewed on a regular basis.

Thank you for the opportunity to provide you with this insight into our Quality, Food Safety and Regulatory programs.

Sincerely,

A handwritten signature in black ink, appearing to read "Eduardo Sanjurjo".

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Please feel free to contact me if you have any further questions