



GIBBON PACKING COMPANY, LLC. Est. #5511, Gibbon, NE
LONG PRAIRIE PACKING COMPANY, LLC Est. #253, Long Prairie, MN
DAKOTA PREMIUM FOODS, LLC. Est. #357, South St. Paul, MN
CIMPL'S MEAT COMPANY, LLC. Est. #2460, Yankton, SD
GREEN BAY DRESSED BEEF, Est. #410, Green Bay, WI

August 7, 2012

Mr. Jim Davis
Gurrentz International
1501 Ardmore Blvd.
Suite 400
Pittsburgh, PA 15221

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 PR/HACCP program

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. In addition, we also use several other validated pathogen interventions including steam vacuums and 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 "NOTICE OF REASSESSMENT FOR ESCHERICHIA COLI O157:H7 CONTROL AND COMPLETION OF A CHECKLIST FOR ALL BEEF OPERATIONS". 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 robust N60 sampling, 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-primal. 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.

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.

Residue testing - This is a USDA/FSIS testing program. All cattle selected for residue testing by the USDA/FSIS veterinarian is placed on hold and the disposition of the carcass is pending until the Laboratory results are available.

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 recover (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 (using robust N60 sampling method) for E. coli O157:H7 testing 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.

To obtain a copy of Letter of Guarantee, please contact Katie Larson {klarson@americanfoodsgroup.com} {920-436-4218}.

Very truly yours,



Ali Mohseni
EVP/Chief Food Safety Officer



CONTINUING GUARANTEE

The undersigned, American Foods Group, LLC establishment numbers 5511, 253, 357, 2460 and 410 (Seller) hereby states that each and every article contained in and comprising each shipment or other delivery hereafter made by Seller to or on the order of Gurrentz International (Buyer), is hereby guaranteed, as of the date of each shipment of delivery, to be:

1. Not intentionally altered or misbranded within the meaning of the Federal Meat Inspection Act and/or Federal Food, Drug and Cosmetic Act, as amended (if applicable), and not an article which may not, under the provisions of Section 404, 505, 512 of such act be introduced into interstate commerce;
2. Registered, if required, and not intentionally altered or misbranded within the meaning of the terms of the Federal Insecticide, Fungicide and Rodenticide Act, or any other applicable Federal, State or local law and Sells has placed Buyer's name on record with the Environmental Protection Agency or similar agency as a registered distributor as such action is required;
3. Not banned or misbranded within the meaning of the terms of the Federal Hazardous Substances Act;
4. Not an article which cannot be legally transported or sold under the provisions of any Federal, State or Local law; and
5. If an article which is or which contains a color additive, such color additive is or will be from a batch certified by the Seller, its subsidiaries, if an, or its suppliers, in accordance with the Federal Food, Drug and Cosmetic Act, as amended, and all regulations issued under said Act;
6. Each and every article contained in each shipment or other delivery hereafter made by Seller to the Buyer or to the order of the Buyer is guaranteed to be produced in compliance with the Fair Labor Standards Act of 1938, as amended, and of the regulations and orders of the administrator of the Age and Hour Division issued under Section 14 thereof.

This guarantee shall not render Seller liable for any incidental or consequential damages of whatsoever nature nor shall it extend to the benefit of persons or corporations other than Gurrentz International or its affiliates.

This is a Continuing Guarantee, subject to revocation by Seller upon ten (10) days written notice to Buyer.

American Foods Group, LLC
Alexandria, MN 56308

By:


EVP/Chief Food Safety Officer

Date: 8/7/12