

# *Schenk Packing Co. Inc.*

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## HACCP Letter

Schenk Packing Co., Inc establishment numbers 6056 and 6056A have maintained a strong commitment to provide safe and wholesome products to our customers. We are federally inspected facilities and operate under a Hazard Analysis and Critical Control Points (HACCP) plan which meets all regulatory requirements set by the USDA/FSIS. Each of our facilities have achieved SQF Level 2 certification. This certification employs numerous company practices and policies which have allowed us to maintain a higher level of food safety.

Our HACCP plan is reassessed annually; in addition to an annual reassessment our plan was reassessed in accordance with FSIS Notice 44-02 which identifies E. coli 0157:H7 as a “hazard reasonably likely” to occur and FSIS notice 65-07 Notice of Reassessment of E. coli0157:H7 Control and Completion of Checklist for all beef operations.

Schenk Packing has identified multiple chlorinated chilled spray applications as our validated CCP to eliminate or reduce E. coli0157:H7 to below detectable levels. The validation of this CCP is based on scientific research performed by IEH laboratories on May 10<sup>th</sup>, 2010. Re-validation is conducted annually. Cold chain management is used to maintain the reduced level of E. coli 0157:H7 and STEC to below detectable levels throughout the production process. This study is also backed up with our internal testing which includes carcass swabs for APC, coliform and generic E. coli.

A requirement of the SQF code is that all critical limits, CCP's and pre-requisite programs are validated annually.

In addition to our chlorinated chilled spray application we also have implemented the following interventions to aid in the prevention of contamination:

- We employ a live cattle wash and sanitizing with hyper chlorinated chlorine
- After knocking, the cut line is sprayed with 180 degree spray followed by cold chlorinated water.
- There are chlorinated water lines throughout the plant for each worker station.
- There are 180 degree sterilizers on the kill floor at each worker station.
- Custom hide removal system.
- All carcasses are subject to a hot water wash cabinet at the final wash station.
- Carcasses are subject to multiple 35 degree chlorinated water chill applications.
- Antimicrobial processing aid is applied to each carcass half after harvest.
- Cold chain management
- Metal detection on all ground beef, patty and case ready production lines
- X-ray use for foreign material detection

E. coli 0157:H7, 026, 045, 0103, 0111, 0121 and 0145 testing is performed on all boneless beef destined for our grinding operation. We perform single combo testing, using an N60 FSIS approved testing method. All lots of boneless beef are held under our company product hold procedure until tests results are received. Verification sampling is conducted quarterly for boneless beef and ground beef.

In the event that we encounter a single or multiple positive test results, Schenk Packing Co., Inc. has procedures in place that allow us to properly dispose of all positive product accordingly and if necessary, re-test product that had previously tested negative. If it is determined that there is a correlation between lot(s) which previously tested negative and the lot(s) that tested positive, the negative product will be treated as a presumptive positive and handled accordingly.

Carcasses are sampled for generic E. coli in accordance with the requirements stated in 9 CFR 310.25(a). In addition to these tests, environmental sampling takes place at numerous locations throughout our processing facility during pre-op and during production. These tests include APC, coliforms, and generic E. coli.

Specified Risk Materials (SRM) are defined as the brain, skull, eyes, trigeminal ganglia, spinal cord, vertebral column (excluding the vertebrae 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, and the tonsils and distal ileum of the intestine of all cattle. SRMs are segregated from human food production and handled as inedible in accordance with 9 CFR 314. The use of a penetrating percussion device which injects air into the cranial cavity is not permitted for stunning.

Our definition of non-ambulatory disabled livestock is consistent with 9 CFR 309.2(b). Non-ambulatory cattle are not allowed in our establishment and are not slaughtered at our facility. If cattle do become non-ambulatory while at our establishment, procedures are in place to ensure that they are humanely handled and removed from the premise to prevent entry into the food supply.

Humane handling is a critical function of our operating system and is a process that we take very seriously. In order to provide superior humane handling we employ a robust systematic humane handling program that starts when the animals are in transport and continues until the final harvest step. Aspects of this plan include training employees who have direct handling with cattle by using the guidelines set by AMI and Dr. Temple Grandin's manuals and videos. Employees are further trained by our in-house PAACO certified auditor. In order to maintain our high level of commitment we perform a weekly handling, transportation and harvest audit to ensure that all employees are meeting our strict criteria in regards to humane handling.

Schenk Packing has recall and traceability procedures in place that allow us to track any of our products that are in commerce. These programs are tested annually to ensure a 100% recovery of product if we ever encountered a situation where potentially adulterated product had been shipped to our customers. As stated above, we perform single combo lot testing on all boneless beef products destined for use in intact product and all products that is being sampled is placed on hold at our facility until test results are received.

We also have a Food Defense Plan in place which aids us in protecting our product in all stages of processing from intentional product contamination.

Schenk Packing Co., Inc. is committed to food safety and providing our customers with a safe, wholesome, quality product.

If you have any questions regarding the contents of this letter please direct them to:

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*Karl Lenz*