IDA BEEF

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Dear Valued Customer,

IDA Beef, LLC at 729 S 600 W Burley, Idaho establishment number M45948 produces edible beef products that meet all USDA requirements for the production, sale and distribution of meat products.

REGULATORY COMPLIANCE Ida-Beef listed below is a federal establishment and operate under the regulatory requirements set forth in Title 9 of the Code of Federal Regulations. Carcasses E. coli Biotype I testing (9CFR§310.25) HACCP & SSOP (9CFR§416 and 417) Salmonella Performance Standard as conducted by USDA-FSIS (9CFR§310.25) Documented Annual Reassessment (9CFR§417.4 (a) (3)) effective January of each year. This annual reassessment includes review E. coli O157:H7 [EC7] and non-O157 STEC as defined by FSIS Federal Register Notice [Docket No. FSIS -2010-0023].

HACCP CRITICAL CONTROL POINT (CCP) Critical Control Points are in place and validated for the control of enteric pathogens (specifically EC7). Validated Final Carcass intended for raw ground use intervention. Chilling, Zero Tolerance for feces, ingesta, and milk (FSIS Directive 6420.2) Disposition for EC7 positive product.

INTERVENTIONS: Ida-Beef employs multiple hurdle interventions to carcasses, primals, and trimmings after the final slaughter CCP intervention for the purpose of reducing microbial contamination that may be present on the surface of the carcass or cuts.

Treatment of carcasses with these validated interventions can result in surface discoloration of exposed lean tissues. Briskets, inside rounds and tenderloins are among the cuts that are most often exposed to these treatments and affected. Occasionally, trimming of the carcass surfaces may result in other discolored sub-primal surfaces as the intervention contacts the expose protein and in turn, results in denaturing of the protein tissues.

Ida-Beef employs a validated multiple hurdle process within the beef slaughter systems to address Enteric Pathogens, specifically E. coli O157:H7 and other non-O157 Shiga Toxin producing E. coli [STEC]. These hurdles include: Steam Vacuums and/ or Trimming – Strategically placed to address pattern opening areas. Carcass Interventions – After FSIS final inspection, carcasses are treated with one or more pathogen reduction interventions which are demonstrated effective in reducing microbial contamination, which is considered as a Critical Control Point [CCP] of the slaughter system. Carcass Spray Chill- Following carcass interventions, carcasses are treated with a processing aid during the spray chill process.

Offal Intervention – Offal products are not intended for raw ground beef; however, they are treated with one or more processing aids which are demonstrated effective in reducing surface microbial contamination, which is considered as a Critical Control Point [CCP] of the slaughter system. Primal & Trim Treatment – Primals and trimmings are treated with an approved processing aid during the carcass disassembly process and prior to packaging. Under USDA-FSIS rules, 'processing aids' are considered Generally Recognized as Safe [GRAS] by the FDA, and do not have to be included in the products ingredient statement on the label. Processing Aids fall under approvals listed in FSIS Notice 7120.1 (http://www.fsis.usda.gov/Regulations_&_Policies/7000_SeriesProcessed_Products/index.asp). Additionally, being listed in FSIS Notice 7120.1 means that there is efficacy data submitted to USDA that supports its' use for pathogen reduction when used as described in the approval.

STEC TESTING & ANALYSIS (FOR ALL PRODUCTS INTENDED FOR RAW GROUND USE) Sampling: Ida-Beef's N60 Prerequisite Program requires a minimum of 60 pieces per lot collected per the outlined methods [or equivalent] within the May 2012 FSIS Compliance Guideline for Establishing Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli [STEC] Organisms or Virulence Markers. Ida-Beef employs N60 surface excision or sampling via the IEH N60 Plus™ sampling device. Analysis: The entire sample is analyzed via PCR or equivalent laboratory method. Laboratory methods are validated to meet USDA criteria (≥98% Sensitivity and ≥90% Specificity). Verification of STEC lab methods are routinely performed at Udder Health Labs in conjunction with the American Proficiency Institute Microbiological Performance Evaluation Program. Laboratories have been audited and certified per ISO 17025 standards. Combo: Tested per customer order with an individualized COA to that specific product. Boxed Trim & Offal: All tested trim and offal items are labeled with green sticker stating "tested".

3rd PARTY AUDIT Ida-Beef is audited on an annual basis by an independent 3rd Party standard. This audit encompasses food safety, regulatory compliance, STEC best practices, SRM, N=60 Addendum, Humane Handling, and good manufacturing practices.

Non-O157 STEC System Producing the safest food possible is Ida-Beef's primary goal. Ida-Beef has reviewed our existing food safety systems, assessed our HACCP programs, and along with published scientific research, we conclude that our existing pathogen reduction technologies and beef slaughter process controls for E. coli O157 are effective in providing the same control to Other-STEC [Top6] in beef trimmings and non-intact beef intended for raw use.

Interventions currently in place for the reduction of Enteric Pathogens, including E. coli O157:H7, are effective in addressing non-O157 STECs. Research conducted by Ida-Beef demonstrates that E. coli O157:H7 is an appropriate 'indicator' organism for Other-STEC in beef trimmings, therefore, testing for E. coli O157 is an effective screening program for the Other-STEC. From the currently available data we thus conclude that "a SYSTEM in control for E. coli O157:H7 is a SYSTEM in control for Other-STEC."

Our robust and comprehensive E. coli O157:H7 trim testing program will continue 100% of our beef trim as this program continues to verify our control of E. coli O157:H7. This research data tells us that this is the best approach for monitoring and controlling Other-STEC as well. For beef trimmings this will be reflected in our COA's and LOG's as "Our robust and comprehensive E. coli O157:H7 trim testing program will continue on 100% of our beef trim as this program continues to verify our control of E. coli O157:H7. This research data is telling us that this is the best approach for monitoring and controlling nonO157 STEC as well. Product was lot tested and found Negative for E. coli O157:H7 and was produced from a System that also controls non-O157 STEC."

Research data will continue to be assessed and scrutinized to ensure that effect non-O157 controls are in place.

Customer Notification Ida-Beef have a recall plan on file that includes notification to affected customers of any product that may be adulterated or misbranded.

Our robust cattle receiving program is designed to comply with FSIS 10800.1 and it addresses residue testing and filters any suppliers who are on the USDA multiple violator list. In addition, we do random sampling on suppliers to validate our receiving program.

Processing Aids Under USDA rule, 'processing aids' are considered GRAS by the FDA, and do not have to be included in the products ingredient statement on the label. Processing Aids fall under approvals listed in FSIS Notice 7120.1 (http://www.fsis.usda.gov/Regulations_&_Policies/7000_Series-Processed_Products/index.asp). Additionally, being listed in FSIS Notice 7120.1 means that there is efficacy data submitted to USDA that supports its' use for pathogen reduction when used as described in the approval.

Q2: What is the definition of a processing aid? Answer: According to the Food and Drug Administration's (FDA) regulations (21 CFR 101.100 (a) (3) (ii)), the definition of a processing aid is: a. Substances that are added to a food during the processing of such food but are removed in some manner from the food before it is packaged in its finished form. b. Substances that are added to a food during processing, are converted into constituents normally present in the food, and do not significantly increase the amount of the constituents naturally found in food. c. Substances that are added to a food for their technical or functional effect in the processing but are present in the finished food at insignificant levels and do not have any technical or functional effect in that food.

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