January 2, 2020

LETTER OF GUARANTEE 2020 – Est# 675

Caviness Beef Packers, LTD – Hereford, TX

Caviness Beef Packers, LTD Est#675, hereinafter referred to as CBP, is a Federally Inspected Establishment that is in compliance with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. All products delivered to you have been processed by approved methods and are solely derived from domestic cattle. CBP is in compliance with the latest revisions of FSIS Directives 5000.1, 6410.1, 6420.2, 10010.1, and 10800.1. We participate in 3rd Party Audits which consist of a BRC Audit, an Animal Welfare Audit, a SRM Addendum Audit, and an E. coli O157:H7 Addendum Audit. HACCP plans and pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually.

HACCP – CBP produces beef products under a Federally Approved HACCP Plan which complies with 9 CFR §416, §417, FSIS Notice 65-07 (reassessing for E. coli O157:H7), and FSIS Notice 40-12 (reassessing for non-O157:H7 STECs). We utilize four validated and verified intervention steps that provide our customers with products which meet or exceed FSIS and Industry Microbial and Quality Standards. HACCP Plans undergo a documented annual reassessment ((9 CFR §417.4(a)(3)) with last annual reassessment completed January 2, 2020.

E. Coli O157:H7 – CCP's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures. By means of this robust sampling methodology we assure control, elimination, and/or reduction of E. Coli O157:H7 and other pathogens (including Salmonella) to below detectable levels.

BIG 6 NON-O157 STECs – CBP produces product utilizing a validated multiple hurdle approach system that controls E. coli O157:H7 and also controls the "Big 6" Non-O157:H7 Shiga-Toxin producing E. coli (STEC). We have a program in place, which was implemented April 2015 that validates our interventions on a monthly basis through analysis of E. coli O157:H7 as well as the "Big 6" serogroups (STEC; O26, O45, O103, O111, O121, and O145).

SALMONELLA – We adhere to the Salmonella Performance Standards as per 9 CFR §310.25.

SAMPLING – Samples are collected by **three** methods; N=60 Excision in which 5 or less combos of beef trim comprise one lot, IEH's N60 Plus Sampler which consist of single combo lots, **and Fremonta's MicroTally MSD cloth sampling represented by single combo lots.** The minimum weight to be tested for excision is 375g. Certificate of Analysis reports accompany all tested beef trim loads. Lab method used for commercial lots is Biocontrol's GDS AOAC# 2005.04 **in which a matrix extension justifies the use for Cloth Sample analysis.** All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025:2005 *General Requirements for the Competence of Testing and Calibration Laboratories.* Packaged subprimals placed into commerce are microbiologically independent by means of being processed and packaged separately from other product without commingling. Boxed vacuum packaged beef subprimals are not intended for use in raw ground products. We perform carcass sampling for Generic E. coli as per 9 CFR §310.25.

HEP – CBP has established a rigorous statistically based High Event Period program that mimics *FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers,* August 2014. We have measures in place to prevent HEP implicated product from being released into commerce which include notification of customers.

January 2, 2020

FOOD DEFENSE – CBP has a Food Defense Plan and other pre-requisite programs in place that assures that no article of food sold to a customer will be adulterated, or misbranded within the meaning of the Federal Food, Drug and Cosmetic Act of 1938, the Federal Fair law; during procurement, production, storage or transportation. Product will be processed in accordance with 21 CFR §110.

INTERVENTIONS – CBP has five interventions that meet requirements of FSIS Directive 7120.1 and the USDA-FSIS Interim Final Rule published in the Federal Register on January 12, 2004. All interventions are validated on a Quarterly basis. We utilize Lactic Acid (LA) as an antimicrobial processing aide at the last two locations listed below.

1. Hot Water Pre-Evisceration Carcass Wash Cabinet – DOK
2. Hot Water Carcass Wash Cabinet – DOK – CCP
3. Lactic Acid Carcass Spray Cabinet – DOK – CCP
4. Hypobromous Acid Spray Chill – DOK/DOF
5. ASC Carcass Spray Cabinet – DOF
   LA Trim Spray – DOF
   LA Subprimal Spray – DOF

HUMANE HANDLING – CBP is in compliance with FSIS Directives 6900.2 and 9 CFR §313 which address Humane Handling and Slaughter of Livestock.

SRM & BSE – We produce product free from Specified Risk Materials; skull, brain, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, and vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), small intestine and tonsils from bovine animals. SRMs have been addressed in our HACCP Plan and pre-requisite programs. We do not accept or slaughter non-ambulatory disabled livestock. We are in compliance with FSIS Notice 56-07. CBP is in compliance with 9 CFR §309, §310, §311, §318, Directive 6100.1 and 6100.4. The SRM brain matter is addressed at the stunning process meeting requirements in 9 CFR §313.15(b)(2)(ii), (air injection stunning devices are not in use at our facility).

RUMINANT FEED BAN – CBP is in compliance with 21CFR589.2000 and 589.2001 which prohibit the feeding of ruminant meat and bone meal to ruminant animals. Records and affidavits are on file for all cattle purchased.

AMR – CBP does not produce AMR (advanced meat recovery) products.

ALLERGENS – CBP does not utilize allergens in any of our processes.

Sincerely,

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