

SAM KANE

Beef Processors, Inc.

PO. BOX 9254

CORPUS CHRISTI, TEXAS 78469

January 12, 2010

Dear Customer:

Sam Kane Beef Processors, Inc. (Est. 337) is dedicated to food safety. We produce all products under a fully implemented Hazard Analysis and Critical Control Point (HACCP) plan that conforms to all requirements set forth in Title 9CFR Ch. III Part 417, as well as the Sanitation Standard Operating Procedures set forth in Title 9CFR Ch. III Part 416. Our food safety systems are monitored and verified by QA personnel.

Our HACCP plan was reassessed on September 19, 2007 in response to FSIS notice 56-07 and October 26, 2007 in response to FSIS Notice 65-07 as per Title 9CFR CH III part 417. Our most current reassessment took place on October 21, 2009. Our HACCP plan is reassessed at least annual as required by the regulations and anytime there are changes that effect the Hazard Analysis or through USDA findings and/or requests.

Sam Kane Beef Processors uses a multiple pathogen reduction strategy that includes:

- Hide on wash
- Organic acid pre-evisceration wash
- Thermal Pasteurization (Hot water wash)-validated critical control point
- Organic Acid wash-validated critical control point.

The validated critical control points: (Hot Water Pasteurization System ($\geq 190^{\circ}\text{F}$) and Lactic Acid Rinse ($\geq 2.0\%$)) are designed to reduce *E. coli* O157:H7 to below detectable levels on carcass beef and have been validated by both in house data and scientific data. Verification is an ongoing process using our trim and final ground sampling results and by monitoring of the parameters of the CCP by the use of indicator organisms.

All carcasses and products produced during the slaughter operation and during fabrication are addressed in our HACCP plans. Sam Kane meets the requirements of 9CFR 310 in testing of carcasses for generic e. coli. In response to the October 7, 2002 USDA/FSIS information on *E. coli* prevalence, we reassessed the beef slaughter and fabrication HACCP plans. *E. coli* O157:H7 was previously identified as a "reasonably likely to occur" food safety hazard in the beef slaughter plan and we incorporated the new supporting data supplied by FSIS. Additionally, we have reassessed all of our HACCP plans in response to FSIS Notice 65-07 citing recent developments in the increased prevalence in *E. coli* O157:H7.

We have and will continue to test all raw materials intended for grinding for *E. coli* O157:H7 using the N=60 testing protocol. The N=60 sampling protocol is the same one that is used by FSIS personnel for sampling. It is designed to detect hazards at very low levels. All trim combos and boxed product that are intended for grinding will use 5 combo lots – or less - for combo trim; and 166 boxes (10,000 lbs) – or less- for box trim. No tested product will be released to our customers until a negative test result has been received. Sam Kane Beef has a written "event day" program in place outlining practices and procedures for investigating and taking appropriate actions when there is a significant increase in the frequency of positive test results. Sam Kane Beef Processors has a recall plan on file that includes notification to affected customers of any product that may be adulterated or misbranded.

Sam Kane Beef Processors is audited on an annual basis by an independent 3rd party auditor. That audit encompasses Animal Welfare, Specified Risk materials, *E. coli* O157:H7 and general good manufacturing practices. A summary of audit scores are available upon request.

Sam Kane Beef Processors, Inc. continues to improve our existing food safety programs and to consider new technologies that will enhance product safety. Should any changes or deficiencies be found with our interventions and/or CCP's, you as the customer will be notified of these changes.

Sincerely,



Brian Honigbaum
Director of Regulatory Compliance