January 27, 2023

LETTER OF GUARANTEE 2021 – Est# 630

CS Beef Packers, LLC – Kuna, ID

CS Beef Packers, LLC Est#630, hereinafter referred to as CS, is a Federally Inspected Establishment that complies with USDA requirements and related FSIS Directives and Notices. Food safety is our culture and highest priority. CS complies 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 – CS 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 yearly reassessment completed January 3, 2023.

E. Coli O157:H7 – CCP's relative to E. Coli O157:H7 are verified with daily robust microbiological sampling using statistically justified procedures. By employing 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. **All ground beef products will be derived from tested raw material that have yielded Negative E. coli O157:H7 results from a verified COA.**

BIG 6 NON-O157 STECs – CS 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 that validates our interventions on a monthly basis through analysis of E. coli O157:H7 as well as the "Big 6" serogroups (STEC; 026, 045, 0103, 0111, 0121, and 0145).

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.

INTENDED USE – Unless otherwise specified, CS Beef Packers produces intact primals/subprimal products. Meeting the definition by not needle tenderizing, grinding or otherwise enhancing any primals/subprimals produced at our facility. CS expects any customer who purchases beef primals/subprimals and then uses that product for other than intact production, to address that specific usage within their HACCP plan and have the appropriate controls in place.

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HEP – CS 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.

FOOD DEFENSE – CS has a Food Defense Plan and other pre-requisite programs in place. This program 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 – CS 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), Acidified Sodium Chlorite (ASC) Or Peracetic Acid (PAA) as antimicrobial processing aides 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, ASC Or PAA Carcass Spray Cabinet – DOK – CCP
4. Hypobromous Acid Spray Chill – DOK/DOF
5. ASC Carcass Spray Cabinet – DOF

   LA OR ASC Trim Spray – DOF

   LA OR ASC Subprimal Spray – DOF

HUMANE HANDLING – CS complies 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, as defined in 9 CFR §310.22(a). SRMs have been addressed in our HACCP Plan and pre-requisite programs. We do not accept or slaughter non-ambulatory disabled livestock. We comply with FSIS Notice 56-07. CS complies 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 – CS complies 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 – CS does not produce AMR (advanced meat recovery) products.

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

SHELF LIFE STUDIES – Shelf life studies are performed on every new product type and when a significant change occurs. Random shelf life studies are continued on a yearly basis.

GASED PRODUCTS – CS utilizes approved product gasses to promote shelf life on fresh Overwrap product and also in Fresh Vacuum sealed packaging as part of specific customer specifications. We will utilize two types of gas mixtures; Bi-gas (LowOx) mixture of 70% N_2 / 30% CO_2 and Tri-gas (LowOx) mixture of $CO/CO_2/O_2$. Gas is metered and monitored during the use into specified product.

Sincerely,

Brandy Whitehead

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