



January 02, 2024

## LETTER OF GUARANTEE – Est# 630

### CS Beef Packers, LLC – Kuna, ID

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CS Beef Packers, LLC Est#630, hereinafter referred to as CS, is a Federally Inspected Establishment that complies with USDA regulatory requirements. 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 3<sup>rd</sup> Party Audits which consist of a BRC Audit, an Animal Welfare Audit, a SRM Addendum Audit, and an E. coli O157:H7 Addendum Audit. Pre-requisite programs (SOP, SSOP, Food Defense Plan, and Recall Plan) are reassessed annually. Edible beef products meet all USDA requirements for production, sale, and distribution.

**HACCP** – CS produces beef products under a 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). HACCP Plans undergo a documented annual reassessment (9 CFR §417.4(a)(3)) effective January of each year.

**STECs** – 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. CS produces products 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 monthly 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** – Combo samples are collected by Fremonta's MicroTally MSD cloth sampling (single combo lots) and box samples are collected via N=60 (≥375g for up to 10,000 lbs lot). Certificate of Analysis reports accompany all tested beef trim loads. The lab method used for commercial lots is PCR BAX RT Exact AOAC-RI 102003. All laboratories used for microbiological testing are AOAC approved and accredited by the recognized International Standard ISO/IEC 17025. Packaged subprimals placed into commerce are microbiologically independent by means of being processed and packaged separately from other products 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.

**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.

**RECALL PROGRAM** – CS has a Recall Program that adheres to FSIS Directive 8080.1 (current revision). Routine Mock Recall exercises are conducted to test the effectiveness of our program.



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**FOOD DEFENSE** – CS has a Food Defense Plan in place that is in accordance with FSIS Form 5420-5 Food Defense Plan Security Measures for Food Defense. 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 the requirements of FSIS Directive 7120.1. All interventions are validated on a Quarterly basis. We utilize Lactic Acid (LA) or Acidified Sodium Chlorite (ASC) 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<sub>2</sub> / 30% CO<sub>2</sub> and Tri-gas (LowOx) mixture of CO/CO<sub>2</sub>/O<sub>2</sub>. Gas is metered and monitored during the use into specified product.

**RECALL** – CS has a recall program that adheres to USDA Recall Plan Guidance which includes notification of affected customers.

Sincerely,

**Sandra Lopez**  
Regulatory Superintendent  
CS Beef Packers  
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