January 8th, 2024

Dear Valued Customer:

You have requested certain food safety information regarding Sysco's Specialty Meat Group (SSMG). All SSMG meat and poultry products are produced in United States Department of Agriculture – Food Safety Inspection Service (FSIS) or Canadian Food Inspection Agency (CFIA) inspected facilities that follow their respective governmental laws and regulations. This includes but is not limited to the U.S. Federal Meat Inspection Act (21 U.S.C. 601 et seq.), the U.S. Federal Poultry Products Inspection Act (21 U.S.C. 451 et seq.) and any other related federal regulations. The Canadian Operations are produced in establishments subject to the Canadian Food Inspection Agency (CFIA) oversight and follow their governmental laws and regulations. All Canadian meat facilities are licensed under the SFCR (Safe Food for Canadian Regulations – SOR-2018-108) as meat processors and distributors and have a comprehensive PCP (Preventive Control Program) in place, which includes a HACCP program. Additionally, certain SSMG facilities process and ship food items (e.g. seafood, dairy products, etc.) covered in the U.S. by Food and Drug Administration (FDA) laws and regulations and in Canada by CFIA laws and regulations other than meat and poultry regulations. In such instances, SSMG facilities comply with the pertinent laws and regulations covering these particular food items. This includes registration of all SSMG facilities in the U.S. under the FDA Bioterrorism Act and Canada under the SCFA registration requirements, and meeting all applicable CFIA, FDA or USDA Food Defense regulatory requirements through implementation of a comprehensive Food Defense plan at each establishment.

All U.S. SSMG facilities comply with the Hazard Analysis and Critical Control Point (HACCP) system regulations promulgated by the Food Safety and Inspection Service (FSIS) of the Department of Agriculture (9 C.F.R. Part 417). More specifically, the HACCP system at each SSMG facility takes into account all FSIS policies and directives on preventive measures against *E. coli* O157:H7 and non O157 Shiga Toxin Producing E. coli (STEC) contamination, including the FSIS notice concerning "Application of the HACCP System Regulations to Contamination With *E. coli* O157:H7" (67 F.R. 62325, Oct. 7, 2002); the FSIS notice on "HACCP Plan Reassessment for Mechanically Tenderized Beef Products" (70 F.R. 30331, May 26, 2005); the FSIS Notice 65-07 on "Reassessment for *Escherichia Coli O157:H7* Control And Completion of a Checklist for All Beef Operations" (Oct. 12, 2007, detailed later in the March 31st, 2010 FSIS Directive 10010.1 Rev. 3 " Verification Activities for *Escherichia coli* O157:H7 in Raw Beef Products"); the FSIS Notice on "Shiga Toxin-Producing Escherichia coli in Certain Raw Beef Products" (77 F.R. 31975, May 31, 2012); and the FSIS affirmation of the interim final rules in 9 C.F.R. Parts 309, 310, and 318 prohibiting the "Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle and the Use of Certain Stunning Devices Used to Immobilize Cattle During Slaughter" (72 F.R. 38700, July 13, 2007). All SSMG facilities in Canada remain in compliance with the requirements of the former CFIA Meat Hygiene Manual of Procedures, including the "Policy on the Control of *E. coli* O157:H7 Contamination in Raw Beef Products" (Chapter 4, Annex O) and "Removal of Specified Risk Materials" (Chapter 17, Annex D). Furthermore, all Canadian SSMGs continue to operate under a CFIA approved Food Safety Enhancement Program (FSEP) HACCP and pre-requisite programs, though that program has be usurped by SCFA, which SSMGs also comply with.

Included in the SSMG Food Safety and Quality Assurance programs, designed to incorporate appropriate U.S. or Canadian regulatory requirements, are the following:

All US SSMG facilities operate under functioning HACCP Plans with Critical Control Points (CCPs) developed upon scientifically documented Hazard Analyses. SSMG HACCP Plan CCPs are validated with scientific documentation and verified on an ongoing basis. Furthermore, SSMG HACCP Plan functionality is reviewed prior to product shipments and all SSMG HACCP Plans are reassessed via a scientific review of potential hazards on at least an annual basis, in the event of relevant new regulations or upon a system change. Most recently, US SSMG facilities reassessed their HACCP Plans for non O157:H7 Shiga Toxin Producing *E. coli* in response to the recent FSIS Notice on "Shiga Toxin-Producing Escherichia coli in Certain Raw Beef Products" (77 F.R. 31975, May 31, 2012). The determination from that reassessment was that a system in control for *E. coli* O157:H7 is also in control for other Shiga Toxin Producing *E. coli*.

All SSMG facilities operate under detailed corporate defined product Recall and Traceability Programs for raw materials, packaging materials, ingredients, finished products and box in and out products shipped and/or received from our facilities. Each facility has a detailed Recall Program, Recall Action Plan, a multi disciplined Recall Action Team and performs semiannual Mock Recalls to test program effectiveness. Furthermore, all US SSMG facilities comply with 9 CFR 418 (*Recalls*) and Canadian SSMG facilities comply with appropriate expectations or requirements of Division 5 of the SFCA (*Investigation, Notification, Complaints and Recall*).

All SSMG facilities operate under a strict Supplier Approval Program for all meat and poultry products which includes obtaining ongoing and verified letters of guarantee from meat and poultry raw material suppliers who provide product for further processing. This letter must assert that each supplier facility has functional HACCP Plans that are in compliance with applicable governmental laws and regulations and have scientifically validated CCPs that are verified on an ongoing basis. Additionally, all beef and/or veal suppliers used for raw non-intact production must assert in their letter of guarantee that all supplier facilities have at least two validated pathogen interventions designed to reduce *E. coli* O157:H7 to an undetectable level with ongoing verification. Also, all beef and/or veal suppliers used for raw non-intact production must assert that they have a process whereby anomalies in patterns from beef trim pathogen tests are used to investigate potential process control issues and to take action on potentially affected products. In response to FSIS Notice 81-13 all suppliers approved for mechanically tenderized beef production must stipulate subprimals are not comingled between the last validated *E. coli* O157:H7 intervention and packaging. All supplier facilities of beef and veal products used for non-intact further processing must pass an annual second party food safety audit or provide an annual passing third party food safety audit summary (with the exception of those suppliers who have attained current Global Food Safety Initiative (GFSI) certification, who supply current certificates of GFSI approval). Audits must include a review of establishment HACCP Program and Plan(s) and their Food Safety Programs. All audits or certifications must include a process for assessment of *E. coli* O157:H7 programs as verification of their letters of guarantee. All beef and veal suppliers who provide product for raw ground beef processing must also provide quarterly verification of beef and veal trim testing programs for *E. coli* O157:H7. Furthermore, beef and veal suppliers, who provide product for raw non-intact production, must (if posting documentation on line) provide updated HACCP Program letters of guarantee upon changes in their core system or invalidation of control points designed to address *E. coli* O157:H7 in beef trim, primal or subprimal products, as appropriate. If not providing on line documents, beef and veal suppliers, providing product for raw non-intact production, must provide HACCP Program letters of guarantee quarterly.

All SSMG facilities ship all beef and veal "bench trim" for further processing to processors who utilize the trim product in a "Lethality" processes as defined and detailed in 9 C.F.R. Part 430 and clarified for a "Full Lethality Treatment" in Chapter VII Part A(2) on page 61 in FSIS Directive 10,010.1 Rev. 3 (March 31st, 2010) "Verification Activities for Escherichia coli O157:H7 in Raw Beef Products", or for further processing to processors who utilize the trim product in fully cooked production in accordance with FSIS Docket No. 95-033F "Performance Standards for the Production of Certain Meat and Poultry Products" - Appendix A "Compliance Guidelines For Meeting Lethality Performance Standards For Certain Meat And Poultry Products", which amended 9 C.F.R. Parts 301, 317, 318, 320, and 381 (64 F.R. 732, Jan.6, 1999). Customer letters of guarantee attesting to this fact are obtained for all customers of SSMG beef trim.

U.S. beef suppliers to SSMG facilities also must maintain, in a letter of guarantee, compliance with the Hazard Analysis and Critical Control Point (HACCP) system regulations in 9 C.F.R. Part 417. This includes the HACCP system at each supplier's facility taking into account all FSIS policies and directives on preventive measures against *E. coli* O157:H7 contamination, including the FSIS notice concerning "Application of the HACCP System Regulations to Contamination With *E. coli* O157:H7" (67 F.R. 62325, Oct. 7, 2002); the FSIS notice on "HACCP Plan Reassessment for Mechanically Tenderized Beef Products" (70 F.R. 30331, May 26, 2005); the FSIS Notice 65-07 on "Reassessment for *Escherichia Coli O157:H7* Control And Completion of a Checklist for All Beef Operations" (Oct. 12, 2007); the FSIS Notice on "Shiga Toxin-Producing Escherichia coli in Certain Raw Beef Products" (77 F.R. 31975, May 31, 2012); and the FSIS affirmation of the interim final rules in 9 C.F.R. Parts 309, 310, and 318 prohibiting the "Use of

Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle and the Use of Certain Stunning Devices Used to Immobilize Cattle During Slaughter" (72 F.R. 38700, July 13, 2007). Canadian beef suppliers to SSMG facilities must maintain in their letter of guarantee compliance with the SFCA. Additionally, all FSIS inspected suppliers of beef and/or veal with slaughter establishments must assert that their livestock comes from suppliers abiding by the appropriate FDA or CFIA Ruminant Feed Ban provisions.

All SSMG facilities must maintain constant compliance with 9 C.F.R. Part 416 "Sanitation" and in Canada under SFCR (SOR 2018-108, Division 4 (*Maintenance and Operation of Establishment*) Subdivision B (*Sanitation, Pest Control and Non-food Agents*)). This includes operating under written Sanitary Standard Operating Procedures, performing and documenting daily Pre-Operative Sanitation Inspections, performing and documenting daily Operational Sanitation Inspections and verifying and documenting utensil and equipment sanitizer applications and strengths. Additionally, these sanitation activities are verified through environmental sampling for sanitary conditions. Also, US SSMG facilities operate under compliance with 21 C.F.R. Part 110 "Current Good Manufacturing Practices In Manufacturing, Packing, Or Holding Human Food.", and in Canada under SFCR (SOR 2018-108, Division 4 (*Maintenance and Operation of Establishment*) Subdivision D (*Conditions Respecting Establishments*)). This includes operating under written plant Good Manufacturing Practices that include sanitary operating and hygiene practices for all plant personnel with verification activities that exceed governmental minimums.

SSMG specifications mandate use of pre-tested boneless beef and/or veal raw materials for all in-plant processed raw ground beef and/or veal products. All raw materials are lot tested for *E. coli* O157:H7 prior to use in our ground beef and/or veal and must have certified or documented lot sample results of "negative" prior to receiving into any SSMG facility. All testing must be performed at the raw material supplier's direction, prior to delivery to the SSMG and must be performed at an accredited laboratory using an FSIS approved Polymerase Chain Reaction (PCR) testing methodology. Additionally, all raw ground beef raw material testing must be performed on a lot basis with lots not allowed to exceed five 2,000 lb. combos and Certificates of Analysis (COA's) of the test results or equivalent documentation must be available for every lot of raw material. All testing must also meet USDA's definition of "Robust Testing" as defined in FSIS Directive 10010.1 Rev 3 (March 31st, 2010). Raw materials for raw ground beef production are not allowed into SSMG facilities otherwise. To that end, we do not require *E. coli* O157:H7 testing of finished products and cannot comply with requests for COA's on finished products.

This letter applies to the following SSMG establishments:

Buckhead Atlanta, USDA Est. # 2697
Buckhead Boston, USDA Est. # 664
Buckhead Central Florida, USDA Est. # 27468
Buckhead Chicago, USDA Est. # 22076
Buckhead Dallas, USDA Est. # 2213D
Buckhead Denver, USDA Est. #31757
Buckhead Edmonton, CFIA Est. # 952
Buckhead Houston, USDA Est. # 10/P7212
Buckhead Mid - Atlantic, USDA Est. # 20815
Buckhead Minnesota, USDA Est. # 8983
Buckhead New York, USDA Est. # 20926
Buckhead North Carolina, USDA Est. # 2697C
Buckhead Ohio, USDA Est. # 2106
Buckhead San Antonio, USDA Est. # 2213A
Buckhead South Florida, USDA Est. # 597
Buckhead Toronto, CFIA Est. # 731
Buckhead Vancouver, CFIA Est. # 664
Crown1 Enterprises – Bay Shore, NY, USDA Est. # 20889
Newport Las Vegas, USDA Est. # 17081
Newport Northern CA, USDA Est. # 2872
Newport Southern CA, USDA Est. # 4195
Newport Portland, USDA Est. # 1164
Newport Palisades, USDA Est. # 4104

Sincerely,

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