



Upper Iowa Beef
EST. # 45321

4614 Highway 63
PO Box 27
Lime Springs, IA 52155
563-566-2202
www.upperiowabeef.com

Dear Valued Customer,

Upper Iowa Beef, LLC (UIB), Est. 45321 is a slaughter and fabrication facility located in Lime Springs Iowa. UIB is fully committed to food safety, is federally inspected and regulated by the United States Department of Agriculture (USDA) Food Safety Inspection Services (FSIS) under the Federal Meat Inspection Act (FMIA) and is not an FDA inspected facilities required to be registered pursuant to the Public Health and Bioterrorism Preparedness and Response Act of 2002, or the current FDA Food Safety and Modernization Act. UIB is a single facility that processes bovine species only.

Our Food Safety and Quality Programs include annual Global Food Safety Initiative (GFSI) standards certification through BRC to incorporate all codex Alimentarius HACCP principles. We operate under SSOP requirements per 9 CFR 416 Sanitation, a written Good Manufacturing Procedures (GMP) program and a Recall/Market Withdrawal Procedure. Annual Mock Recall testing ensures trace-back and track-forward capabilities for all products and packaging materials as well as cattle and cattle suppliers. Other documented Food Safety programs include Pest Control, Foreign Material Control, Food Security, a Product Hold Program, a Food Defense Program, and an Allergen Control Program.

UIB complies with FSIS HACCP per 9 CFR 417 Hazard Analysis and Critical control Point Systems. Our HACCP plans identify *E. coli* O157:H7 and Non-O157 STEC [O26, O45, O103, O111, O121 & O145] as a 'hazard reasonably likely to occur'. Three Critical Control Points (CCP's) are in place. Each CCP involves a pathogen intervention method specific to reducing *E. coli* O157:H7 below detectable levels.

- **CCP 1B** ZT Zero Tolerance inspection of Carcasses, Market Heads and Head Products -Zero Tolerance for fecal material, milk, and ingesta (USDA FSIS Directive 6420.2)
- **CCP 2B** Antimicrobial/Organic Acid Spray (>2.0% lactic acid) application prior to chill (Kalchayanand, et. al 2209, 2011).
- **CCP 3B** Carcass Surface Temperature of $\leq 45^{\circ}$ F verified prior to fabrication. (Tompkin, R.B. 1996)

All CCP critical limits are monitored at a frequency to ensure process control. Each HACCP plan is reassessed at least annually. Pre-shipment review record checks are completed daily to verify CCPs have been met and our process remains under control.

Best practices for Sanitary Dressing are followed on the slaughter floor. This includes trimming and inspection to aid in microbial reduction as well as a multiple hurdle approach using a bone dust wash cabinet, organic acids and BoviBrom application and cold chain management. These multi hurdle practices follow in accordance with FSIS Directive 6410.1 Verifying Sanitary Dressing and Process Control Procedures in Slaughter Operations. These steps have been validated to reduce or eliminate pathogens of concern including, but not limited to, *E. coli* O157:H7, non-O157 STEC's, and Salmonella. Additional methods in place include an antimicrobial agent applied immediately prior to the packaging of subprimals and trim. Each antimicrobial is recognized by USDA-FSIS (Directive 7120.1) as a Safe and Suitable Ingredients Used in the Production of Meat, Poultry, and Egg Products therefore, there is no implication to labeling or need for inclusion in the ingredient statement.



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Pathogen Testing for *E. coli* O157:H7 is done using N60 or equivalent protocol for customers requesting COA information. A validated MicroTally MSD cloth sampling method is used. Samples are sent to accredited third-party laboratories, which use AOAC approved methods. Certificates Of Analysis (COA's) accompany each lot of tested products. The absence of a COA is an indication that the product has not been tested due to customer purchase requests at time of sale. Primals and subprimals vacuum packaged into bags and boxed are not tested for pathogens and are intended solely for intact use, these are not intended for grinding. UIB expects any customers who purchase our products and utilize these products for non-intact processes will address the specific usage within their HACCP plan and have appropriate controls in place.

Non-O157 Shiga Toxin producing *E. coli* (STEC) Scientific research has shown that the same interventions that are effective for controlling, reducing, or eliminating *E. coli* O157:H7 are also effective on the non-O157 STECs (Kalchayanand, N. et al., 2012). Industry data has proven that a production system that controls the presence of *E. coli* O157:H7 also effectively controls the presence of non-O157 STECs. Our Food Safety processes outlined above are designed to eliminate or reduce *E. coli* O157:H7 to below detectable levels; hence, controlling the non-O157 STEC levels to the same degree. Once per quarter during the 1st and 4th quarters of the year and monthly during the 2nd and 3rd quarters of the year, a STEC verification check sample will be run to ensure this holds true in our process. To test for STEC, two samples shall be taken out of a lot by using an approved method with 1 sample sent to the outside laboratory for *E. coli* O157:H7 or STEC per regular procedure (cloth method). The 2nd sample will be an excision sample. This 2nd sample will be ground and sent to an outside laboratory for *E. coli* O157:H7 testing and the six other prevalent Shiga-Toxin Producing *E. coli*. If these samples do not confirm negative all corrective action procedures will be followed. An accredited 3rd party audits this program and process annually. Additional generic *E. coli* testing is completed daily on carcasses per the requirements of 9 CFR 310.25 *Contamination with microorganisms; process control verification criteria and testing; pathogen reduction standards.*

UIB follows an Animal Welfare Program in full compliance with all provisions of humane handling rules and regulations included in 9 CFR 313 *Humane Slaughter of Livestock* and with the current "*Recommended Animal Handling Guidelines and Audit Guide*" published by the North American Meat Institute (NAMI) Foundation. All cattle producers supply a Beef Quality Assurance (BQA) certificate showing training to these standards. Cattle producers also sign a producer affidavit to certify compliance with born and raised in the USA claims, animal breed claims, nutrition information, and handling and transportation training. In addition, this producer affidavit documents compliance with 21 CFR 589.2001 *Animal Proteins Prohibited in Ruminant Feed* and 21 CFR 589.2001 *Cattle materials prohibited in animal food or feed to prevent the transmission of bovine spongiform encephalopathy*, which bans the use of "prohibited mammalian protein" specifically feeding ruminant meat and bone meal to ruminant animals.

UIB complies with FSIS Guideline for Residue Prevention through animal drug residues, pesticides, environmental contaminants, and any other chemical hazards testing by following FSIS Directive 10,800.1 *Residue Sampling, Testing And Other Verification Procedures Under The National Residue Program For Meat And Poultry Products*. A Public Health Veterinarian (PHV) or designee will follow this program as directed.

Ante-mortem inspection is conducted on all cattle intended for slaughter per 9 CFR 309 *Ante-mortem Inspection*. UIB FSQA personnel in conjunction with USDA FSIS personnel, monitor all aspects of live animal handling and slaughter procedures. Other programs include Exclusion of non-



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ambulatory disabled livestock as defined by FSIS Directive 6900.2 *Humane Handling And Slaughter Of Livestock*, compliance with FSIS Directive 6100, *Ante-Mortem Livestock Inspection, and Final Regulations for Non-Ambulatory Disabled Cattle*. Cattle processed at the UIB facility have not been subjected to air injection stunning (9 CFR 313.15(b)(2)(ii)). An accredited 3rd party audits the Humane Handling program annually.

UIB is compliant with Bovine Spongiform Encephalopathy [BSE] related regulations - 9 CFR 309, 310 and 318 et. al., *Prohibition of the Use of Specified Risk Materials (SRM's) for Human Food*. All non-ambulatory disabled cattle that have been presented for anti-mortem inspection are condemned and disposed of through rendering or the landfill. UIB removes, segregates, and properly disposes of all SRMs prohibited by Federal Register 9 CFR 310.22(a). Brains and spinal cords from carcasses identified to be 30 months of age and older are denatured, disposed of in a landfill and not allowed to enter any rendering systems. An accredited 3rd party audits this SRM program and process annually.

UIB exports to other countries and produces products under the standards set forth for exporting into those countries. We maintain a Quality Systems Assessment Manual (QSA) for the Export Verification Program that is audited annually by USDA Quality Assessment Division (QAD), Agricultural Marketing Service. UIB products may be sent to an off-site 3rd party cold storage facility prior to shipping. We utilize insured carriers to transport products. All loads are initially sealed at our establishment and are maintained under seal by the carrier in the event of a multi-stop load.

We look forward to continuing to provide you with safe, quality products. If you need additional information, please contact me.

Respectfully,

Annette Kime 1-5-2026

Annette Kime
Food Safety Manager
Upper Iowa Beef



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