



**SAM KANE BEEF PROCESSORS, INC**  
**POLICY STATEMENT ON NON-O157 SHIGA TOXIN PRODUCING E. COLI (STEC'S)**  
**June 30, 2017**

This letter is to clarify Sam Kane Beef Processors' position and readiness to address non-O157 Shiga Toxin Producing *E. coli* in raw ground beef components and raw ground beef.

Within the Industry, there have been numerous discussions about the role of non-O157 Shiga Toxin Producing *E. coli*, (STEC's), their prevalence, and threat to public health. As with all Food Safety issues, Sam Kane has been involved in these discussions and has worked with national experts and food safety leaders to determine our role and stance in regard to STEC's.

Sam Kane Beef Processors, Inc. is committed to food safety and public health. Sam Kane continues to be at the forefront of Food Safety practices by participating in ongoing research and implementing new strategies and technologies. We do this not only because it is required by law, but because it is the right thing to do.

In partnership with our customers, Sam Kane strives to supply beef products that are wholesome, of high quality, and most importantly, safe. We do this for our customers and our families as well. Recently we have expanded this commitment by achieving certification in the Safe Quality Foods (SQF) program as determined by the Global Food Safety Initiative (GFSI).

Sam Kane Beef continues to update and monitor our HACCP program, investigate new food safety technology, advance animal welfare, and use one of the most intensified sampling programs in the industry. Sam Kane continues to work with our partners, scientists, trade groups, industry experts, and the USDA to further educate our employees and remain at the forefront of new technology and industry best practices

On September 13, 2011, the Food Safety and Inspection Service (FSIS) released an advance copy of a *Federal Register* Notice entitled: "Shiga-Toxin Producing *Escherichia coli*" in Certain Raw Beef Products". In this Notice, FSIS states that in addition to *E. coli* O157:H7, six other *E. coli* serogroups (O26, O45, O103, O111, O121, and O145) will be classified as adulterants within the meaning of the Federal Meat Inspection Act (FMIA). FSIS will initiate a sampling plan for these STEC's on raw, non-intact beef products or components on March 5, 2012. An additional comment period was added changing the implementation date of this testing to June 4, 2012. Additionally, FSIS plans to begin testing ground beef at a future date for STEC's.

It is important to note that multiple scientific studies show that current intervention strategies used for the reduction and prevention of *E. coli* O157:H7 appear to be as effective against these six additional STEC strains<sup>1</sup>. We will continue to update and review our Hazard Analysis and Critical Control Point program (HACCP), as new information becomes available from FSIS.

---

<sup>1</sup> EVALUATION OF CHEMICAL DECONTAMINATION TREATMENTS FOR BEEF TRIMMINGS AGAINST *ESCHERICHIA COLI* O157:H7, NON-O157 SHIGA TOXIN-PRODUCING *E. COLI* AND ANTIBIOTIC RESISTANT AND SUSCEPTIBLE *SALMONELLA* TYPHIMURIUM AND *SALMONELLA* NEWPORT. AUGUST, 2011. <http://www.amif.org/wp-content/uploads/10-119.pdf>

This year, members of our Food Safety Team met with Dr. Mohammed Koohmaraie, Chief Operating Officer (COO) of the meat division of IEH laboratories, and a well-known expert regarding non-O157 Shiga Toxin Producing *E. coli*. Our discussions focused on three main subjects:

1. The state of the testing methodology, its cost, and USDA Validation
2. The state of our current intervention strategies as they related to the six additional STEC's
3. Performance of early testing to determine our baseline and gather internal data

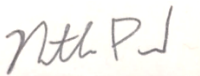
After consultation with our Food Safety team, the following are the actions Sam Kane Beef is taking regarding non-O157 Shiga Toxin Producing *E. coli*:

1. Sam Kane has sufficient validated scientific and in-plant data to show the effectiveness of our food safety system in relation to *E. coli* O157:H7 and therefore (based on the current science available<sup>2</sup>) these interventions are effective against the six additional strains of STEC's.<sup>3</sup> During the next 90 days, Sam Kane will continue to gather data to verify the effectiveness of these interventions relating to all classified *E. coli* adulterants. FSIS Notice 29-12 details specifics associated with the testing and at the current time we are not required to reassess our Hazard Analysis (HACCP).
2. If and when in-plant testing commences, we will be using the IEH testing methodology for the non-O157 Shiga Toxin Producing *E. coli*. These methods are currently available and have been referenced by the USDA in their literature. We are in receipt of a "Letter of no Objection" from USDA regarding our validated testing methodology<sup>4</sup>.

We are continuing to work on the reporting and format of our Certificate of Analysis (COA) in addressing these six STEC's, and will provide our customers with a draft COA for approval if and when in-plant testing will commence. Additionally, we are currently reviewing the laboratories testing and validation methods and can provide those documents at your request.

Sam Kane is committed to Food Safety and will continue to take actions as required by our customers, scientific based evidence, industry best practices, and the USDA. As more information becomes available or as FSIS provides further clarification, we will evaluate our decisions to determine if changes are required in our program or our policies. Sam Kane Beef will keep you informed on all changes.

Sincerely,



Nathan Pond  
Director of Food Safety  
Sam Kane Beef Processors, LLC

---

<sup>2</sup> Bosilevac, Mic, Post-harvest Control Measures for non-O157 STEC in Beef  
USDA-Agricultural Research Service, U.S. Meat Animal Research Center

<sup>3</sup> Cutter, Catherine, Rivera-Betancourt, Mildred

Interventions for the reduction of *Salmonella Typhimurium* DT 104 and Non-O157:H7 Enterohemorrhagic *Escherichia coli* on Beef Surfaces. *Journal of Food Protection*, Vol. 63, No. 10, 2000, Pages 1326-1332

<sup>4</sup> [http://www.fsis.usda.gov/Regulations\\_&\\_Policies/NTT\\_STEC\\_NOL/index.asp](http://www.fsis.usda.gov/Regulations_&_Policies/NTT_STEC_NOL/index.asp)