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**National Beef Packing (NBP) Customer Statement on Non-O157 Shiga Toxin Producing  
*Escherichia coli* (STEC)**

National Beef Packing (NBP) Establishment #'s 208A, 262, and 8 (Iowa Premium) consider food safety our top goal in meeting our customers' needs and doing our part in ensuring that we are supplying the highest quality product. NBP continues to assess our overall food safety plan, including our aggressive HACCP plan. In these assessments, we use internal data, along with available published scientific research and current USDA FSIS guidance and public comments to determine that our current food safety system controls that we use to address *E. Coli O157:H7* is effective in addressing the top 6 STEC's that have been identified by USDA FSIS as pathogens of concern.

Based on USDA FSIS guidance and several public comments by FSIS, and our internal test data, it is our position that National Beef will not implement robust testing for the top 6 STEC's until STEC's are shown to be a food safety concern in fed beef. **USDA FSIS has been clear that at this time industry testing is not required and that the current thinking is that existing technologies are as effective on STEC's as they are on *E. Coli O157:H7*.** National Beef internal data supports that our current interventions are sufficient to address incidental STEC contamination.

NBP will use our effective robust trim sampling methodology for all trimmings that are destined for grinding to help ensure that we are not only adequately monitoring for and controlling *E. Coli O157:H7*, but also effectively addressing the 6 STEC's.

In addition, NBP will continue to conduct on-going STEC testing. This will be done to further validate our processes on the control of STEC's. We have added STEC testing in as part of our routine Quarterly Validation of taking negatively tested trim, grinding and retesting for both *E. Coli O157:H7* and the 6 STEC's (this is done monthly in the summer months). We will continue to work with industry trade associations and USDA on changes or new information as it becomes available.

We believe that this action is consistent with USDA FSIS expectations. As we learn more from USDA FSIS testing and our on-going assessments, we will better understand the course of action that will best serve our on-going food safety commitment to our customers.

Sincerely,

Brenden McCullough  
V.P. Technical Services  
National Beef Packing Co. LLC