



John Soules Foods, LLC.  
10150 FM 14  
Tyler, Texas 75706  
(903) 592-9800

January 9, 2019

Dear Valued Customer,

Thank you for requesting general information regarding the food safety programs at John Soules Foods, LLC. d/b/a John Soules Foods and/or d/b/a ProView Foods (herein after "JSF"). The following facilities are all located within the United States and are federally inspected and verified by United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS):

Facility	Facility Location	Est. #/P #	BRC Certification	FDA Registered
Aviation	Gainesville, Georgia	31784/P-31784	A	Exempt
Tyler	Tyler, Texas	2128/P-2128	AA	Exempt

**LETTER OF GUARANTEE**

John Soules Foods guarantees that, when shipped, all items manufactured are in full compliance with:

- The Federal Food, Drug and Cosmetic Act as amended, and are not adulterated or misbranded within the meaning of said Act, and may be introduced into interstate commerce without violating said Act.
- Neither adulterated nor misbranded within the meaning of the Federal Meat Inspection Act, as amended.
- Labeled in compliance (food product and its ingredients) with the Federal Meat Inspection Act and approved by the USDA Standards and Labeling Division.

All fully cooked items produced by John Soules Foods are cooked in compliance with Appendix A and chilled in accordance to Appendix B

**FOOD SAFETY PROGRAMS**

**HACCP**

JSF operates under a federally mandated Hazard Analysis and Critical Control Point (HACCP) program, which conforms to all necessary requirements set forth in 9 CFR Part 417. This program is reviewed by the multidepartment HACCP team and USDA on a regular basis, but no less than annually. In an effort to control *E. coli* O157:H7 and other pathogens, all cooked products must meet a lethality critical control point (CCP) followed immediately by a stabilization critical control point. CCP's within the facility have been internally validated to ensure proper critical limits (CL) and monitoring frequencies have been established. CL's are monitored by HACCP trained individuals specifically designated to verify JSF is meeting the limits set within the HACCP program.

## Animal Welfare

While John Soules Foods establishments do not harvest, all facilities operate under an approved supplier procedure. Within this procedure, all meat and poultry suppliers who harvest are required to have a current third-party animal welfare audit on file. This program as well as approved supplier status is reviewed on a regular basis and amended as necessary.

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## Prerequisite Programs

JSF's HACCP program is supported by prerequisite and quality programs that include but are not limited to the following:

- Good Manufacturing Practices (GMP's)
- Traceability
  - JSF operates under a recall procedure. Mock traceability exercises are performed at minimum four times annually.
  - These exercises include tracing raw materials, ingredients, packaging, finished products, and/or rework.
  - During these exercises, one hundred percent of product must be accounted for within two hours. In the event this cannot be achieved, corrective actions are required as well as an additional unannounced test of the system.
  - Each facility maintains a multidepartment recall team with 24-hour contact numbers in the unlikely but necessary event that a recall may be necessary
- Food defense
  - Facilities are fenced and access controlled by key cards
  - Visitors are accompanied by a JSF representative
  - A food defense audit is conducted annually, at minimum by food defense trained individuals as well as USDA
- Contingency Plan
  - In the event of a natural disaster or other crisis situation preventing production of product, JSF may utilize other JSF facilities and/or approved external manufacturers.
- Contracted pest control
- Contracted sanitation
- Foreign material detection
  - All products undergo foreign material detection within the process flow
  - All finished products not destined for further processing have been through foreign material detection after packaging
- Allergen control
  - Segregation and clear labeling is maintained within storage facilities of allergenic materials
  - Tools are marked appropriately in the marination area
  - Lines are scheduled appropriately so that no cross contamination of allergens occurs
- Weight verification
- Label inspection
- Testing
  - To verify efficacy of our process, extensive environmental swabbing and product sampling is conducted at JSF.

- Each day of operation, multiple swabs are taken of product contact surfaces, non-contact surfaces, and drains.
- Products are tested on a daily basis with samples being pulled from the line at least once an hour.
- Monitoring results are tracked to identify trends within the system allowing for the opportunity to try to prevent problems from arising.
- JSF operates under a test and hold policy
- COA's are available upon customer request
- Approved supplier
  - All foreign and domestic suppliers are required to comply with applicable US government regulations
  - Meat suppliers must have at minimum the following on file and up to date
    - Third party facility audit
    - Third party animal welfare audit (harvest facilities)
    - Letter of Guarantee
    - In the event an establishment's facility audit is not a GFSI scheme, an additional supplier questionnaire will be answered
    - Distributors and brokers without a GFSI scheme audit must provide a list of original manufacturers for each material supplied as well as the required supplier documentation
    - JSF reserves the right to request a supplier audit
  - Poultry suppliers must have at minimum the following on file and up to date
    - Third party facility audit
    - Third party animal welfare audit (harvest facilities)
    - Letter of Guarantee
    - In the event an establishment's facility audit is not a GFSI scheme, an additional supplier questionnaire will be answered
    - Distributors and brokers without a GFSI scheme audit must provide a list of original manufacturers for each material supplied as well as the required supplier documentation
    - JSF reserves the right to request a supplier audit
    - Kill certificates accompanying each load (as required for exports)
  - Non-meat suppliers must have at minimum the following on file and up to date
    - Third party facility audit
    - Letter of Guarantee
    - In the event an establishment's facility audit is not a GFSI scheme, an additional supplier questionnaire will be answered
    - Distributors and brokers without a GFSI scheme audit must provide a list of original manufacturers for each material supplied as well as the required supplier documentation
    - JSF reserves the right to request a supplier audit
    - COA's accompanying each load
  - Packaging suppliers must have at minimum the following on file and up to date
    - Third party facility audit
    - Letter of Guarantee

- In the event an establishment’s facility audit is not a GFSI scheme, an additional supplier questionnaire will be answered
- Distributors and brokers without a GFSI scheme audit must provide a list of original manufacturers for each material supplied as well as the required supplier documentation
- JSF reserves the right to request a supplier audit
- Training
  - Employees go through a robust training system managed through Alchemy.

These programs are reviewed on a regular basis and amended as necessary. All programs are in compliance with USDA and Global Food Safety Initiative BRC audit scheme *The Standard* requirements. These are considered company confidential programs, but can be reviewed on request at one of the aforementioned establishments.

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## AUDITS

All establishments undergo an annual BRC audit. Aviation and Tyler have consistently strived for the highest score achievable under the announced BRC scheme, as part of the Global Food Safety Initiative (GFSI). Current certificates can be found online at <https://www.johnsoulesfoods.com/food-safety/>. Corrective action summaries may be requested, and full audit reports can be reviewed on request at a John Soules Foods establishment.

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## FACILITIES

The RTE facilities are set up to minimize cross contamination risks. The raw and cook sides are divided by a full wall. Color code designations are implanted plant wide to visually identify raw and cook as well as various color designations between the lines. Furthermore, there are separate breakrooms for raw and cook employees, each with their own access points. Raw employee badges cannot access the cook areas, whereas cook employees cannot access the raw areas. Additionally, we further segregate sanitation and maintenance, and tools are to be kept in their respective area.

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## SOCIAL RESPONSIBILITY PRACTICES

John Soules Foods is committed to operating its facilities in an ethical and legal manner. JSF promotes diversity and forbids discrimination based on age, color, disability, creed, or relationship orientation. Any form of abuse or harassment included but not limited to physical, psychological, verbal, or sexual in nature is strictly forbidden, and employees are encouraged to report any violations of this nature.

John Soules Foods is actively involved in the communities in which the various facilities operate. JSF makes donations of time and/or money to charitable organizations and events and encourages employees to do the same.

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John Soules Foods continually strives towards including more sustainable practices, as possible. This includes but is not limited to recycling cardboard, treatment of waste water, and partnering with suppliers whom also strive towards greater sustainability. However, at this time, JSF does not currently hold a formal sustainability certification.

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**CLAIMS**

**Gluten Free**

The Tyler location has the capacity to produce gluten free products.

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**Certified Angus Beef® (CAB®)**

An extensive identity preserve program is in place at the Tyler facility to maintain a proper mass balance and identification of CAB® raw materials as well as finished products. CAB® products are properly labeled.

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**No Antibiotics Ever (NAE)**

An extensive identity preserve program is in place at the Tyler and Aviation facilities to maintain a proper mass balance and identification of NAE raw materials as well as finished products. NAE products are properly labeled.

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**Genetically Modified Organism (GMO)**

While JSF maintains suppliers whom source materials that are Non-GMO, due to the nature of the JSF process, no formal Non-GMO claims can be made for finished goods produced at any of the JSF facilities at this time.

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**USDA Organic**

At this time, only JSF Tyler Est. 2128 is USDA Organic certified.

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**Natural**

At this time, products that are considered “natural” are indicated as such on the labeling. If it is not stated on the packaging, some or all components used may still be considered natural; however, specifications do not dictate the product to be labeled as “natural.”

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**Child Nutrition (CN)**

Both establishments currently have the capabilities to product CN products.

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**Further Process Certification Program (FPCP)**

At this time, JSF Tyler has the capabilities to operate under the FPCP.

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**Prop 65**

At JSF we strive towards compliance with Prop 65. However, due to our ever-evolving business we request you to contact regulatory department at [SpecRequest@jsfoods.com](mailto:SpecRequest@jsfoods.com) if you have questions regarding specific products.

**Produced In**

All products produced by John Soules Foods are done so in the United States of America.

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You are cordially invited to visit our facilities and review our processes, with proper notification provided through your company contact. John Soules Foods is committed to supplying our customers with safe and quality products. If further information is needed, please feel free to contact a JSF office at any time.

Respectfully,



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