



August 7, 2020

Chef Rubber COVID-19 Response and Information Notice*

The FDA Food Safety Modernization Act (FSMA) is the most extensive reform of our food safety laws in more than 70 years, passed by Congress in 2010, and Presidentially endorsed into law on January 4, 2011. FSMA changes the approach of how food is regulated by aiming to ensure the safety of the U.S. food supply through a focus on prevention, rather than responding after a food safety event has occurred. Before FSMA was signed into law, Chef Rubber had already taken an aggressive stance on transitioning our business model towards FSMA compliance.

On March 14, 2020, The FDA issued a Temporary Policy for FSMA Onsite Audit Requirements. Though largely directed at preventing disruptions in the food supply-chain, there were three regulations created to implement FSMA.

1. Preventive Controls for Human Food (PC Human Food) rule
2. Preventive Controls for Animal Food (PC Animal Food) rule
3. Foreign Supplier Verification Programs (FSVP) rule

These rules require receiving facilities and importers to conduct supplier verification activities based on the hazard analysis conducted as part of their written Food Safety Plan or FSVP. When receiving facilities and importers develop their Food Safety Plans or FSVP, it is often determined that onsite audits are the most appropriate supplier verification activity. Chef Rubber has always been conscientiously attentive with the audits and inspections of our own suppliers. This includes our obligation to the security criteria for C-TPAT and foreign manufacturers. We are steadfast in our commitment to the role we play in food supply chain integrity to ensure that pertinent security measures are in place and adhered to throughout our business partners' supply chain.

Since the advent of COVID-19 and the severe impacts to our industry, we have taken methodical approaches to fortify the preventative measures of FSMA to food safety, through an intensive evaluation of human safety within the operation. Our quality control process (QC) has always encompassed the regulations provided by the FDA, Health Department, FSMA and the other agencies that regulate and supply guidance on the prevention of pathogens. However, we have added an additional layer of prevention that focuses on Safety Assurance (SA) that falls under our QC umbrella. Beginning with the evaluation of human interaction within our operation, we assess contact points of possible transmission and cross contamination. We then systematically mitigate these effects through preventative measures such as distancing, sanitation, isolation, and

duplication of resources that may have been previously shared. Standard items that were already in place have been enhanced. For example, employer-approved faces masks, reengineering solutions to social distancing, available facilities and materials allow workers to practice safe hygiene such as that recommended by the CDC for handwashing. Workplaces and stations are disinfected in frequent intervals by using ultraviolet practices to minimize the overuse and risk posed by chemical sanitizers. Employees are checked at least twice daily for temperatures that may exceed 100.4F and other COVID-19 related symptoms. Employees are also encouraged to self-monitor for any onset of symptoms during their shift.

In addition to following CDC recommendations, we have taken a forceful approach to minimize human contact with our products. Such measures include safe handling practices by eliminating human contact all together or by fully automating entire phases of our production. We consistently review all information available to us to determine if there are any possibilities of COVID-19 transmission through any of our products. The World Health Organization (WHO) directs the concerns by saying “Studies suggest that coronaviruses (including preliminary information on the COVID-19 virus) may persist on surfaces for a few hours or up to several days. This may vary under different conditions (e.g. type of surface, temperature or humidity of the environment).” Despite these studies, the FDA has determined that there is no evidence that food or other product/materials can transmit the virus. FDA guidance reinforces that COVID-19 is a respiratory virus, not foodborne disease, and that ill workers do not necessitate a food recall. Chef Rubber is closely attending to the everchanging rules and guidelines for safety. Should any rules or regulations change, and an unlikely COVID-19 related recall be implemented, we are already documenting paths of contact tracing. This will allow us to quickly and efficiently notify our clients so they may begin their own processes of evaluation and or recall if necessary.

Chef Rubber is focused on the safety of our employees and our products. We are taking measures to safeguard the protection of our clients and their customers. With your safety in mind, we want you to be aware of the extensive care we take to deliver the products you have depended and trusted in for over 20 years. In these unprecedented times, the Chef Rubber family appreciates your confidence and the support you provide by using the highest quality products we provide to our industry. As you move forward in excellence, we wish all of you an abundance of health, security, and prosperity.

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