



February 26 rd 2020

STATEMENT OF COMPLIANCE

I. Exporting beef products to the United States of America and Canada

The Establishment is approved by the Secretary of Livestock, Agriculture and Fisheries

(SENASA) of Argentina to produce for export bovine meat for human consumption.

It has the Register Number issued by the Official Competent Authority — the Secretary of Livestock, Agriculture and Fisheries (SENASA).

II. The Establishment Pathogen Reduction Program

1. The Establishment has an operative and documented HACCP-based food safety assurance system, approved by SENASA. It complies with the U.S. Federal Register, 9 CFR part 304, et al. and includes a documented SSOP plan. The Establishment operates under Good Manufacturing practices (GMP), mandated by the U.S. Federal Register, 21 part 110.
2. The Establishment HACCP-based food safety assurance system:
 - a) Is periodically reassessed and internally audited.
 - b) Is continuously audited by the Officers from the Official Competent Authority — SENASA.
 - c) Is periodically audited by FSIS Officers and by the Competent Authorities of other countries.
 - d) Is periodically audited by international commercial customers and certification bodies
 - e) The standard performance criteria and the testing of generic *Escherichia coli* bacteria to verify the effectiveness of the sanitation process control of cattle carcasses are operative.
3. The Establishment participates in the National program for *Salmonella* spp. cattle carcass testing and control, issued by the SENASA.



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4. The Establishment follows the SENASA Rule for the control and testing of Non O157 Shiga-toxin-producing Escherichia coli (STEC - 026, 045, 0103, 0111, 0121 and 0145), which is lined up with FSIS Regulations.
5. The Establishment has in place the current E. coli O157:H7 and Non O157 Shiga-toxin-producing Escherichia coli (STEC) N60 sampling Methods, as defined by the SENASA and the FSIS.
6. The Establishment follows the USDA-MLG 5 Series for laboratory testing.
7. The Establishment control procedure for E. coli O157:H7 and E. coli non-O157 are based on production LOTS. LOTS are defined following FSIS and SENASA guidelines. Under these requirements, no LOT will be subdivided into more than one shipping container.
8. All the current records from the above information are available at the Establishment.
9. The Establishment HACCP Reassessments done by the HACCP Team includes:
 - a) The HACCP Plan which has been initially validated on May 2003 (CFR part 804, §417.4(a) (1).
 - b) Periodically or annually the Establishment develops a Verification update (Reassessment) to assure product safety (9 CFR Part 304, §417.4 (a) (2) and (a). The last entire reassessment was March 2019.
10. The Establishment HACCP Reassessment for E. coli O157:H7 and for E. coli non O157 (STEC)
11. The justifications for not including the E. coli O157:H7 and the E. coli non-O157 (STEC) as potential hazards reasonable likely to occur in the HACCP Plan and a specific CCF, are:
 - a) The HACCP Team performance of a proper and complete Hazard analysis reassessment for E. coli O157:H7 and for E. coli non-O157 (STEC - 026, 045, 0103, 0111, 0121 and 0145) assuring they are hazards not reasonable likely to occur in the Establishment.
 - b) There were no positive results in the verification testing for E. coli O157:H7 and / or E. coli non O157 (STEC) in beef finished products, in the planned Establishment self-controls or from official (MGAP) sampling, during the last calendar year.
 - c) As a preventive measure, if a deviation not covered by a specified corrective action occurs, or if an unforeseen hazard arises, the Establishment will:
 - (a) Segregate and hold the affected product;
 - (b) Takes action to ensure that no product that is injurious to health or otherwise adulterated, as a result of the deviation, enters into commerce;





(c) Performs a reassessment of the Food Safety System, to determine whether the newly identified deviation or other unforeseen hazard should be incorporated into the HACCP plan; (d) Records all corrective actions taken, which are subject to verification by the Official Competent Authority (SENASA).

d) As a preventive measure if a deviation occurs the Establishment changes the routine sampling to follow up sampling of beef under the FSIS requirements and with the supervision of the Official Competent Authority (SENASA).

III. Bovine Spongiform Encephalopathy (BSE) preventive measures

1. The Establishment follows strict local and international rules and regulations on "Specific Risk Materials (SRM) as preventive measures to Bovine Spongiform Encephalopathy (BSE) disease.
2. Argentina continues having the "Negligible BSE risk Status" of the World Organization for Animal Health (OIE).
3. Under official regulations (SENASA), Argentina does not import live animals or their products from countries having a controlled BSE risk or from countries recognized as having an undetermined BSE risk.
4. The Official Veterinary Inspection performs a daily ante mortem inspection procedure, condemning every cattle dead, dying, disabled or diseased and determining their proper disposition.
5. As required by FSIS, the Establishment does not use penetrative captive bolt stunning devices that inject air into the cranial cavity of cattle during slaughter.
6. The Establishment has a post mortem GMP procedure for handling and disposition of the bovine SRM: brain, head, eyes, trigeminal ganglia, spinal cord, dorsal root ganglia, tonsils and the distal ileum of the small intestine.
7. The final disposition of the SRM includes an inactivation process: incineration at more than 800 °C and appropriate disposition of the ashes.
8. The proper records on SRM and the training activities to the personnel involved in SRM handling and disposition are available at the Quality Assurance Department.

IV. The Animal Welfare preventive measures

1. The Establishment follows the World Organization for Animal Health (OIE) and the U.S. AM. I. Guidelines on Animal Welfare on livestock transport and slaughter operations.





2. The Establishment has written procedures for Animal Welfare control and makes periodical internal audits on them. The records are available at the Quality Assurance Department.

V. Chemical control and antibiotic residue program

Establishment is committed to produce products of the high standards of food safety and quality and according with the National Residual Program, Plan CREHA (SENASA), about the drugs use prohibition. The Establishment do not use any kind of drugs in violation of applicable laws in country destination.



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