



Promissão December 27<sup>th</sup> 2016

## Letter of Compliance

### STATEMENT OF COMPLIANCE (HACCP-PREERQUISITES LETTER)

#### 1 APPROVALS AND CERTIFICATIONS

Frigorífico Marfrig Global Foods S.A., Establishment N°2543 is approved by the European Commission (Food and Veterinary Office) and the US Food Safety and Inspection Service (FSIS –USDA) to produce for export bovine meat fresh, frozen, to United States. We certify that our programs and operations comply with all applicable USDA-FSIS regulations and that incoming cattle comply with all applicable FDA and USDA regulations.

Establishment N° 2543 in the handling of the Specific Risk Material (SRM) in the Plant is conformed with the Official Brazilian Rules effective at the moment, in accordance with the Federal Register Rules and Regulations (CFR) N° 310.22 OF January 12<sup>th</sup>, 2004. Brazil is listed at the World Organization of animal health (OIE) current Resolution as having negligible Bovine Spongiform Encephalopathy (BSE) risk in accordance with Chapter 2.3.13 of the Terrestrial Code. Therefore, the HACCP plan is in compliance with FSIS NOTICE 31st, 2007, of SRM final rule.

Since 14 of September of 2016, we complied with the Federal Register, Volume 61, N°144 25 July 1996 FSIS released the PR/HACCP Rule (also referred to as the MegaRegs). The Pathogen Reduction component mandated a program of bacteriological testing of bovine carcasses for the presence of Escherichia coli generic and Salmonella spp. bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.

Establishment N° 2543 is GSFS (BRC) Issue 7 (January 2015) certified, achieving Grade AA, for the following activities: chilled boned and boneless meat, chilled and frozen cuts and trimmings, frozen offals and stomachs, frozen cooked beef, beef extract and portioned cuts.

Establishment N° 2543 is ISO 22000:2005 (Food safety management systems-requirements for any organization in the food chain) certified, for the following activities: frozen and chilled bone-in and boneless beef cuts, frozen and chilled portioned beef, frozen portion controlled beef, frozen ground meat frozen offal, frozen stomach, blanched stomach, frozen cooked beef and beef extract. Enclosing process: receiving of livestock, slaughtering, boning, freezing, processing, packing, storage and loading. Certified valid from 10 September 2011 until 10 September 2017.

#### 2 HACCP AND PREREQUISITES PROGRAM

HACCP plan and the prerequisite programs (SSOP, SPS and GMP) has been audited by the Ministry of Livestock of Brazil on September 08 a 09/2016, and accepted as satisfactory and was audited by European Union and the inform very satisfactory and by the most of the external Official sanitary authorities: Chile, E.U., and others.

The Company has in place a fully documented Good Manufacturing Practice- SPS (Sanitation performance standards), Sanitation Standard Operating Procedures (SSOP) and Hazard Analysis Critical Control Point (HACCP) integrated of our quality assurance system:

Complies with Brazil Ministry MGAP guidelines for meeting FSIS Pathogen Reduction / HACCP requirements.

The prerequisites includes:

- Documented pest control program designed to prevent pest activity within the plant and its surrounding area, by Licensed Pest Control Operators.
- Implemented written training programs sufficient to ensure that HACCP plans, pre requisites are properly executed.
- There is documented employee hygiene practices program.
- Traceability system.
- We comply with Animal welfare protocol and we have documented program outlining animal handling in compliance with MGAP guidelines, USDA – FSIS Directives 6900.2, 16-08 and 17- 08 and CE Directive EU 1099/2009.



*Qualidade em Carne*

MARFRIG GLOBAL FOODS S.A.

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The HACCP plan is audited by Ministry of Agriculture supervisors on plant.  
It has internal audits (GMP, SSOP, HACCP every year)  
The company is audited by most of the customers and external Official sanitary Authorities including:  
The good Manufacturing Practices (GMP's), SPS, Sanitation Standard Operating Procedures (SSOP's) and Hazard Analysis Critical Control Point (HACCP) integrated system of quality assurance.  
The Company compliance with USDA –FSIS prohibitions on SRM.  
SSOP's implementation, monitoring, corrective action and documentation.  
Critical limit justification and validation against official a scientific documentation.  
Critical control monitoring, verification and validation procedures.  
The company verifies the HACCP System by:  
Analytical test and or audit the monitoring procedures.  
Calibration of the equipment.  
Sampling of the products.  
Review the monitoring records.  
Review the deviations and product dispositions.  
Sample the environment and other concerns.  
Its internal audit (GMP, SSOP, HACCP, Quality system) minimum once a year.

### 3 PATHOGEN REDUCTION PROGRAM

In the last 06 years, Salmonella has not been detected in any randomly selected carcass sample tested.  
In relation to E. coli O157:H7, establishment 2543 confirms that its HACCP Plan has been reassessed in accordance with Federal Register Notice 9 CFR Part 417( Docket N° 00-022N) 7 October 2002 Titled E. coli O157:H7 and according with Notice 65-07 October 2007 for raw ground beef manufacturing trimming: USDA.  
The HACCP Team of the Company consider E. coli O157: H7 is a hazard reasonably likely to occur in its products without the implementation of a HACCP Plan.

In relation to Shiga toxin-producing Escherichia coli (STEC) (O26,O45 ,O103,O111,O121 and o145) Establishment 2543 confirms that its HACCP plan has been reassessed in accordance with Federal Register according with the Federal Register Vol.76 N°226, del 23 of November of I 2011.

The STEC are send to internal laboratory and the methodology used is BAX PCR –real time bases in USDA MLG for the detection of Shiga toxin- producing Escherichia coli (non O157).

We have an environmental sampling for Listeria sp. Implemented.

The plan includes the following measures (according with FSIS Directive 6410.1 Verifying Sanitary Dressing and process control procedures in slaughter operations of cattle of any age).

Animals should arrive with minimum mud and faecal contamination and avoid overcrowding to reduce the possibility of injury or unsanitary conditions.

- Livestock pens capacity is sufficient to hold a single day 'kill.
- Washing of cattle to eliminate contamination on their hides, monitoring, verification, take corrective action if there is deviation (Good manufacturing Practice and SSOP).
- Minimize contamination of the carcass (monitoring and verified by quality Assurance operator).
- Good manufacturing practice and SSOP operations for hide removal (with 2 knives of different colours) (Monitored and verified by quality assurance personal).
- Prior to evisceration, the rectum is secured with a ring and plastic protection to prevent contamination.
- All visible contamination is removed as soon as possible after it occurs to prevent microbial attachment with knife trimming (monitoring, verified, corrective measure and corrective if it is necessary) (Monitored, verified, corrective measure and corrective if it is necessary).
- 180°F (82°C) water knife / equipment sanitizers are utilized.
- As a part of the HACCP reassessment, the slaughter plan is in compliance with USDA-FSIS Notice 5607 of the "SRM final rule, about the proper removal, segregation, and disposal of Specified Risk Materials.

The efficacies of these interventions are verified by microbiological testing for E. coli O157:H7 using methodologies Official method AOAC 2000.14.

Microbiological testing is used to also verify the effectiveness of interventions and process controls at slaughtering:

Since Aug 2016, considering the new sampling method (n=60 for each lot), tests have been made for E. coli O157:H7 according with it.



*Qualidade em Carne*



MONTH	SAMPLES	TOTAL NEGATIVE TESTS	TOTAL POSITIVE TESTS
June	182	182	0
July	167	167	0
August	550	550	0
September	319	319	0
October	676	676	0
November	708	708	0

Only product that complies with HACCP requirements and tested "negative" for E. coli O157:H7 is shipped. Marfrig Group Promissão 2543 confirms that its HACCP Plans have been reassessed in reference to the new regulation of USDA / FSIS Control Programs for Non- O157 shiga toxin-producing Escherichia coli (Non O157 STEC)

#### Company Objectives and management:

Frigorífico Marfrig Global Foods, Promissão 2543 is committed to implement and maintain compliance with the HACCP Plan, Good manufacturing Practices, Standard Operating procedures, quality policies (Quality control assurance) in order to improve the safety and quality of the product.

Sincerely yours,



Adriano Biles de Carvalho  
Gerente Garantia da Qualidade

HACCP Team leader - Quality Assurance Manager  
Promissão/ SP/ Brazil  
SIF 2543



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