

Barretos - SP, 31th October, 2016.

To whom it may concern

Subject: Compliance Statement for USA

- Establishment Registration

- The establishment, under SIF 421, located in Barretos/SP is registered in the Ministry of Agriculture, Livestock and Food Supply of Brazil (MAPA) as a slaughterhouse of bovine.
- Brazil is recognized as an eligible country to export raw and processed beef to USA.
- Brazil's food safety system is equivalent to the United States, including Control Programs and testing for Shiga toxin-producing *E. coli* (STEC - serogroups: O157: H7, O26, 45, O103, O111, O121 and O145) and *Salmonella spp.*,
- The establishment, according to the Memorando Circular 473/2016/DHC/CGI/DIPOA/SDA/GM/MAPA is eligible to export raw and processed beef to USA.

- HACCP Plan

- The establishment has an operative food safety system.
- The HACCP plan implemented complies with the U.S. Federal Register, 9 CFR Part 417, and is at least annually reassessed.
- This plan is frequently audited by MAPA and is BRC certified, a GFSI recognized standard.
- HACCP plan contains 2 CCP as follow:

CCP	Significant Hazard	Critical Limit
Carcass Inspection - CCP B1	Biological: Contamination by pathogenic microorganisms (<i>E. coli</i> , <i>Salmonella spp.</i> and <i>E.coli</i> STEC)	Zero (0) for fecal and/or ingesta contamination
Metal Detection CCP F2	Metal particles	Ferrous = 7 mm and larger; Nonferrous (copper) = 7 mm and larger; Stainless steel = 7 mm and larger

- In the hazard analysis reassessment, Shiga toxin-producing *E. coli* (STEC) was considered as a hazard with high severity and low probability of occurrence due to the interventions adopted (listed below).
- In the hazard analysis reassessment, *Salmonella spp* was considered as a hazard with medium severity and low probability of occurrence due to interventions adopted (listed below).

The hazard analysis reassessment includes the following interventions, but are not limited to:

- ü Ante mortem inspection by Federal Inspection Service

- ü Cleaning and disinfection of corrals; spray bath with hyperchlorinated water under pressure of animals prior the stunning;

- ü Perianal washing of the animals that defecate after stunning;

- ü Application of Good Manufacturing Procedures and Standard Operating Procedures in all slaughtering steps during the dressing and evisceration, and in the cutting steps (half-carcass division): use of different knives to cut leather and to dressing the carcass, sterilization of instruments and handwashing between carcasses, monitoring of the procedures by quality control inspectors;

- ü Sealing of the esophagus and intestines using a clip, and bagging the bung to prevent cross contamination.

- ü Zero tolerance controls are in place for managing contamination from faeces and ingesta (CCP located at the end of slaughtering process);

- ü Line speeds appropriate to providing adequate time for performing hygiene procedures of dressing.

- ü Carcass washing for removal of bone dust, blood and blood clots.

- ü Carcasses Chilling Control (maximum temperature of 4,5°C measured on the carcass surface after 24 hours in the chilling chamber)

- ü Sanitation Standard Operating Procedures (SSOP) – sanitation procedures are performed every day at the end of production, including cleaning and sanitization of all equipment, contact e non-contact surfaces. Quality inspectors evaluate these procedures before start production the following day, and samples from the equipment and contact surfaces are taken to check the cleaning effectiveness, according to an analysis plan.

- ü Employees training concerning SOP and Good Manufacturing Practices (GMP)

- ü Final product testing plan – every day beef samples (including cuts and trimmings) are tested for *E. coli*, *Salmonella* spp., *Listeria monocytogenes* and Total Count Plate. Beside these analyses there is a specific testing program of STEC and *Salmonella* for production destined to USA.
 - ü Chilling and freezing regimes to control microbial growth.
 - ü Documented Corrective and Preventative actions are in place and followed.
- Shiga toxin-producing *E.coli* (STEC - serogroups: O157: H7, O26, 45, O103, O111, O121 and O145) and *Salmonella* spp. Control Programs
 - The establishment participates of the official *Salmonella* spp testing program for chilled livestock carcass that is consistent with the FSIS *Salmonella* spp performance standards in 9 CFR 310.25(b).
 - The establishment performs generic *E. coli* testing program in chilled livestock carcasses. The testing program is outlined in Microbiological Tests on Livestock Carcasses (Circular n° 835/2006/CGPE/DIPOA), determined equivalent by FSIS.
 - For Shiga toxin-producing *E.coli* (STEC), one sample of each product code must be collected by hour. The sampling was defined in accordance with the Brazilian regulation (Memo 63/2016/CGCOA/DIPOA/SDA/GM/MAPA), which is aligned with FSIS requirements.
 - The methodology used for STEC analysis is MLG 5A and MLG 5B, according to the United States Department of Agriculture (USDA).
 - All testing results are available before the container is released for shipping.
 - MAPA conducts official audits every 3 months in the establishments approved to export to USA, and STEC controls are also verified.
 - Until now the use of antimicrobial agents in beef is not allowed by MAPA. However, MAPA is carrying out a study to validate the use of lactic acid and other methods to reduce pathogens on carcasses.
 - Bovine Spongiform Encephalopathy (BSE) preventive measures
 - Brazil has a negligible risk status for BSE, according to OIE.
 - As required by MAPA, the establishment does not use penetrative captive bolt stunning devices that inject air into the cranial cavity of cattle during slaughter.

- The following items are classified as Specified Risk Material (SRM): brain, eyes, palatine and lingual tonsils, spinal cord and dura, distal ileum, which are removed and then incinerated.
- Skull, trigeminal ganglia, spinal column (excluding the vertebrae of the tail, sacrum, the transverse processes of the thoracic and lumbar vertebrae), and dorsal root ganglia of cattle with 30 months of age or more are also classified as SRM. These material are intended to use for non-edible products, and they do not enter into human consumption chain.
- The proper SRM records and the training activities to the personnel involved in SRM handling and disposition are available at the Quality Assurance Department.
- The use of animal products and by-products as ruminants feeding is forbidding since March 2004 by MAPA.

Sincerely,



Marcia Lopes
Executive Quality Manager