



15<sup>th</sup> January 2018

**Teys Australia Naracoorte  
Establishment 423  
Letter of Guarantee**

**Establishment Registration**

Australian export operations are conducted under the regulatory controls of the Department Of Agriculture and Water Resources (DAWR). DAWR is the Federal Government authority responsible for Food Safety, Overseas Country Requirements and Australian Export Standards, ensuring the exported /supplied product is fully compliant with Foreign and Australian government requirements.

**Health Controls**

DAWR veterinary officers have in addition to disease / health control, a full time on plant role, monitoring / auditing company performance in the discharge of their obligations under DAWR Approved Programs.

**Overseas Listing**

Establishment 423 is USA listed and operates under a DAWR Approved Arrangement program to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

**HACCP Plan**

The Approved Arrangement program incorporates HACCP. The HACCP plan contains CCP's which directly address the hazard of Shiga toxin-producing *Escherichia coli*.

**HACCP Reassessment**

The HACCP plan has been reassessed in accordance with Federal Register Notice 9 CFR part 417 Docket Number 00-022 N dated 7 October 2002 – *E. coli* O157:H7 Contamination of beef products and DAWR MAA 1231 - United States of America - Management of Shiga Toxin-Producing *Escherichia coli* in Beef intended for Grinding.

This included the hazard consideration within the HACCP plan of the additional non O157 STEC's O26, O111, O45, O103, O121 and O145.

The HACCP reassessment has determined that while STECS may be a potential hazard on incoming cattle it has been concluded that due to the effective implementation of the HACCP plan and Sanitary Standard Operating Procedures the hazard has been effectively controlled resulting in it not being reasonably likely to occur on product and the current HACCP plan is adequate to address these hazards.

**Food Fraud/Adulteration Vulnerability Assessment (VACCP)**

Raw materials and services are categorised based on the potential risk they may pose to Teys business. Suppliers and their products/services undergo a formal risk assessment considering food safety, quality and legality prior to being approved.

Supplier performance and product compliance is reviewed annually or sooner if information becomes available which may trigger an immediate review.



The reassessed HACCP Plan reviewed all steps in the process including the following interventions:

1. DAWR ante mortem on all livestock pre-slaughter
2. Identification and management of ill or injured livestock Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export
3. Cattle are assessed for cleanliness prior to slaughter
4. Use of highly trained operators
5. After stunning - sealing of weasand by application of a clip/plug to prevent spillage
6. Sealing of the bung via bagging to control cross contamination
7. Line speeds appropriate to providing adequate time for hygiene inspections and dressing of the carcase
8. Sanitising hands and equipment between carcases for high risk activities
9. Knife sterilisation between carcases
10. All carcases are subjected to a final inspection and hygiene trim
11. Zero tolerance controls are in place for managing contamination from faeces, ingesta and milk spillage
12. Carcase hot water wash pre chilling
13. Chilling and freezing regimes to control microbial growth
14. Product hygiene is monitored daily following the DAWR meat hygiene assessment guidelines
15. Documented Corrective and Preventative actions are in place and followed
16. Microbial testing of contact surfaces and product

#### **Verification *E. coli* O157:H7**

##### **Sampling**

To verify the ongoing effectiveness of these interventions Establishment 423 conducts sampling and testing of Beef Trimmings for *E. coli* O157:H7 in accordance with DA Meat Notice 2012/04 *Escherichia coli* O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N=60 Method). In 2017 Establishment 423 had 530 samples tested with 2 confirmed positives for *E. coli* O157:H7.

##### **Hold and Release**

All product is subject to a 'Test, Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and returned negative test results for *E. coli* O157:H7 are released for shipment.

##### **Laboratory**

Samples are tested by an ISO17025 accredited laboratory approved to conduct testing of meat products for *E. coli* O157:H7.

##### **Testing**

Screening tests are performed using AOAC 031002 Bax Real Time PCR for *E. coli* O157:H7 and AOAC 091301 Bax Real Time PCR for detection of selected STEC in beef trim or AOAC 2005.04 Assurance GDS for *E. coli* O157:H7 in selected foods and AOAC 071301 Assurance GDS MPX Top 7 STEC for detection of Top 7 Pathogenic STEC in beef trim.

Potential positive results are confirmed using IMS ISOLATION MLG 5.08 and MLG 5B.05.

#### **BSE**

Australian legislation prohibits the feeding of all Restricted Animal Materials to all ruminants, including cattle.

All beef products destined for the USA are free from Specified Risk Materials (SRM).

SRM is removed in accordance with Federal Register Notice 03-025IF.

Product from non ambulatory, disabled or downer cattle is excluded from export.

Yours sincerely

Katherine Hill B.App.Sc. (Food Technology), A.A.I.F.S.T  
General Manager Food Safety & Compliance