



WINGHAM BEEF EXPORTS PTY. LIMITED

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January 8, 2019

To whom it may concern

Wingham Beef Exports Pty Limited Establishment 154, E.coli O157:H7 and non O157 STEC, STATEMENT of COMPLIANCE. This statement should be read in conjunction with the Australian Government Department of Agriculture and Water Resources (DAWR) Microbiological Manual for Sampling and Testing of Export Meat and Meat Products – *Shiga Toxigenic Escherichia coli* testing of raw ground beef components intended for export to Canada, the United States of America and its territories.

In response to your request concerning food safety, Wingham Beef Exports Pty Limited Establishment 154, confirms it has process controls, including its HACCP plan that is designed to control microbiological hazards (for example O157:H7).

Wingham Beef Exports Pty Limited Establishment 154, confirms that its HACCP Plan has been reassessed in line with 9 CFR Part 417 E.coli O157:H7 Contamination of beef products, and FSIS Directive 10,010.1 and in accordance with 'Federal Register Notice 9 CFR Part 417 Docket Number 00-0022N Dated 7 October 2002. This reassessment has determined that E.coli O157:H7 and the non O157 STEC are hazards that are reasonably likely to occur without the implementation of the HACCP plan.

The reassessment of Wingham Beef Exports Pty Limited Establishment 154 HACCP plan, in accordance with (DAWR) Guidelines Approved Arrangement – Meat in which has been audited and verified by the Australian Government Department of Agriculture and Water Resources.

The reassessed HACCP plan found that continuous and effective operation of Sanitary Standard Operating Procedures, Work instructions, Meat Hygiene Assessment, Escherichia, Salmonella and Total Viable Count Monitoring (ESAM), current CCP's, Corrective action, Pre-shipment review and process controls are in place at Wingham Beef Exports Pty Limited, Establishment 154.

The reassessed HACCP plan includes the following interventions:

- Ante mortem inspection by Australian Government Department of Agriculture and Water Resources personnel
- Detailed livestock washing prior to slaughter
- Occlusion of the oesophagus with a plastic plug prior to hoisting and sealing the oesophagus with a weasand clip
- Dual knife system to ensure effective sterilisation after each cut through the hide
- Use of shrouding of the hind legs to prevent cross contamination prior to hide removal



- Sealing of the bung with a plastic bag and elastrator ring
- Use of a ball point blade on the brisket saw
- Trimming of any contamination
- Meat Hygiene Assessment of dressed carcass with zero tolerance procedures and monitoring program against written work instructions
- All operators are retrained in their procedures using written work instructions on a regular basis. All new employees are trained off the job in personal hygiene and sanitation and assessed on the job as part of an industry traineeship

These interventions reduce, eliminate or control *E.coli* O157:H7 and non O157 STEC. The efficacies of these interventions are verified by microbiological testing for *E.coli* O157:H7 and non O157 STEC.

As well as the above interventions the following procedures are applied:

- Established Standard Operating Procedures and Work Instructions for control of sanitation and hygiene.
- Microbiological control programs for personal hygiene, equipment and contact surfaces and pre-shipment review procedures.

***E.coli* O157:H7 Sampling Protocol (N:60)**

Wingham Beef Exports Pty Limited Establishment 154 samples and test in accordance with Australian Government Department of Agriculture and Water Resources (DAWR) Microbiological Manual for Sampling and Testing of Export Meat and Meat Products – Shiga Toxigenic *Escherichia coli* testing of raw ground beef components intended for export to Canada, the United States of America and its territories.

Wingham Beef Exports Pty Limited Establishment 154 commenced using the N=60 sampling protocol on April 1, 2010. The testing program of Wingham Beef Exports Pty Limited is monitored by the Australian Department of Agriculture and Water Resources on a regular basis.

Wingham Beef Exports on site laboratory has Australian Government Department of Agriculture and Water Resources approval for testing. These procedures are documented in the Laboratory General Procedures Manual (Section 28 STEC Test) procedures are overseen by the on plant Department of Agriculture and Water Resources Supervisor on a regular basis.

Wingham Beef Exports Pty Limited uses the Australian Government Department of Agriculture approved test method being the Official AOAC Certificate 071301 (Bio Control – Assurance GDS MPX Top 7 STEC). All products are placed under isolation until test results are received. Results are recorded as being negative or potential positive.

Potential positive samples are forward to the Australian Department of Agriculture approved laboratory for conformation by FSIS MLG5B or MLG5.

All raw beef components intended for grinding have tested negative for *E.coli* O157:H7 and STEC testing was in accordance with the DAFF / AQIS protocol and represent an entire sampled lot which has been subject to N=60 sampling.

Over the period of January 9, 2018 to December 20, 2017 inclusive of continuous operation using the Official AOAC Certificate 071301 (Bio Control – Assurance GDS MPX Top 7) test method, there have been 2690 cartons sampled to conduct 344 tests with no detection for E.coli O157:H7 and the additional six non-O157 serotypes.

No tested product is released for sale unless the test results show that E coli O157:H7 and non-O157 serotypes have been reduced to below the detectable levels.

SRMs and Non-Ambulatory

Wingham Beef Exports Pty Limited Establishment 154 has in place Standard Operating Procedures to ensure and prevent meat and meat products which contain Specified Risk Material, carcasses of BSE subclinical cases entering export markets.

- Australian standards prohibit the feed of meat and bone meal products to any ruminant animals.
- SRM as defined in 9CFR310.22 are not required to be removed for products regulated by FSIS, however other BSE control measures still apply to FSIS regulated products. These include,
 - Prohibition of stunning equipment that actively injects air into the brain cavity,
 - All non-ambulatory, disabled or downer cattle are excluded from the USA product line.
 - Prohibition of Mechanically Deboned Meat (MDM)
 - Any animals tested for BSE are excluded from our raw material until animal is cleared.

Prerequisites

Establishment 154 has mandatory documented procedures for

- Pest control,
- Employee Training,
- Personal Hygiene,
- Product Integrity / Security,
- Product traceability and recall.
- Animal Welfare - Animals are handled and slaughtered in accordance with Australian welfare standards, which include ante and post mortem inspection

With the reassessment of Wingham Beef Exports Pty Limited Establishment 154 HACCP plan and of its continued effective operation, detailed in the information provided here, Wingham Beef Exports Pty Limited Establishment 154 has concluded that,

E.coli 0157:H7 and non O157 STEC is a hazard reasonably unlikely to occur in its products.

Wingham Beef Exports Pty Limited Establishment 154 is committed to producing product of the highest safety and quality.



G. Coleman
General Manager
Establishment 154