

GBP AUSTRALIA PTY LTD

ABN: 67 670 830 824

60 Gardner Lane, Poowong Vic 3988

(P O Box 5), Poowong Vic 3988

Ph: (03) 5659 2280 Fax: (03) 5659 2281

1st January 2020

US Supply Letter of Guarantee

GBP Australia Pty Ltd EST 224

Establishment Registration

Australian export operations are conducted under the regulatory controls of the Department Of Agriculture (DA). DA 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

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

Overseas Listing

Establishment 224 is USA listed and operates under a DA 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 DA Meat Notice 2002/13 and 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 DA 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 being, 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.

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

1. DA 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 for slaughter
4. 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 is in place for faecal, ingesta and milk spillage
12. Chilling and freezing regimes to control microbial growth
13. Product hygiene is monitored daily following the DAFF meat hygiene assessment guidelines
14. Documented Corrective and Preventative actions are in place and followed

15. Microbial testing of contact surfaces and product

Verification *E coli* O157:H7 Sampling To verify the ongoing effectiveness of these interventions Establishment 294 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 in accordance with DA Meat Notice 2012/03 Escherichia coli O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N=60 Method). In 2014 Establishment 294 had 2813 samples tested with 5 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 to conduct testing of meat products for *E coli* O157:H7. **Testing** Screening tests are performed using AOAC 031 002 Bax Real Time PCR for *E coli* O157:H7 and 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 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 5.05 and MLG 5B.02.

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 by being fully compliant with the McDonald's BSE Firewalls.

All non ambulatory, disabled or downer cattle are excluded from the United States product line.

Yours sincerely

Bill Bato
QA Manager