



H. W. Greenham & Sons Pty Ltd

ACN 054 461 415

ABN 26054461415

Meat Exporters

Friday 4th January 2019

LETTER OF GUARANTEE

H W Greenham & Sons – Tongala Establishment Number 234

HACCP REASSESSMENT

Establishment No 234 H W Greenham & Sons is committed to producing meat that is of the highest standard of food safety and quality and confirms that its HACCP plan has been reassessed on the 23rd April 2018 in accordance with US Federal Register Notice No 9 CFR Part 417 Docket Number 00-022N dated 7 October 2002 and AQIS Meat Notice 2002/13 and will continue to complete annual reassessments in accordance with DAFF Meat Notice 2002/13 and DAFF Meat Notice 2012/3 (dated 20th Dec 2012)

This reassessment has determined that while E.coli O157: H7 may be a hazard that is reasonably likely to occur 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.

The following control measures and interventions are implemented at H W Greenham and Sons Tongala Est. 234

- Livestock washing prior to slaughter and ante-mortem inspection by an DAWR Veterinary Officer prior to slaughter
- Application of Chlorine Dioxide (Twin Oxide) to hide at opening lines prior to dressing (no contact with product)
- Occlusion of the oesophagus during the slaughtering process
- The use of a plastic bag and elastrator ring for tying and sealing the bung
- The use of a ball point blade to prevent possible contamination when sawing the brisket
- Sanitising hands and equipment between carcasses for high risk activities
- Trimming of all external selvage areas of carcasses
- CCP on the slaughter floor for hygiene trimming operations
- Meat Hygiene Assessment of product and process monitoring against written work instructions
- CCP for Chilling and Freezing of product to control microbial growth

The reassessment of the HACCP plan is approved and audited by the Department of Agriculture and Water Resources (DAWR) who conduct on site monitoring and verification.

As part of the company Quality Assurance System requirements the HACCP plan is reassessed at least annually or when there is a significant product or process change, new product development or new hazards are identified. In the event there is an unexplained system failure a HACCP reassessment will take place immediately2

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SRM's (as defined by USDA- FSIS Notice 56-07) and Non-Ambulatory (as defined by FSIS Directive 6900.1, Rev 1) do not enter the US food chain due to the strict control measures within the company's Approved Arrangement. Detailed within our Approved Arrangement are:

- SOP 11.2.2 Slaughter and Dressing
- PQC 11.1.10.1 TSE Sampling Program
- PQC 11.1.10.3 Non-Ambulatory / Disabled Production and Product Control

These programs detail USA BSE & TSE Rules, Segregation and identification procedures and SRM

E.coli O157:H7 Non O157 Sampling and Testing Program

Beef destined for grinding in the USA are sampled in lots under N60 testing program where sample size of 375gm per container using method Biocontrol Assurance GDS Top 7 STEC or BAX Real Time PCR for STEC in accordance with DAWR Microbiological Manual for Sampling and Testing of Export Meat and Meat Products version 1.02. From 4th June 2012 all beef destined for grinding has been sampled in lots under an N60 program where a sample size of 375gm per lot using method Biocontrol Assurance GDS Top 7 STEC or BAX Real Time PCR for STEC in accordance with DAWR Microbiological Manual. This testing is for the Top 7

All staff conducting sampling and testing have been trained and assessed as fully competent. H W Greenham has a NATA accredited laboratory (NATA Accreditation No 14272) that participates in both internal and external proficiency Testing programs to verify competencies

All product destined for grinding is held under a test and hold program until clearance of tests are confirmed. Should a presumptive positive E.coli O157 H7 and Non O157 result be obtained all affected product is retained under both Company and DAWR control until a confirmatory result is received. If the confirmation is positive the product is withheld from the market and heat treated in Australia

Independent N60 verification sample testing is carried out on a monthly basis. This testing is conducted by DAWR using independent 3rd Party NATA accredited laboratories

H W Greenham and Sons Est 234 has had an E.coli O157 H7 testing program in place since 2002 and to the end of 2017 a total of 33,022 samples have been tested with 39 positives, giving a prevalence rate of 0.12%. In the calendar year 2018 a total of 1150 samples have been tested with 1 positive, giving a prevalence rate of 0.08%

Only product that is compliant with HACCP requirements and where E. coli O157 H7, O26, O45, O103, O111, O121 O145 has not been detected is released to the market

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Salmonella Prevalence

Calendar year 2017

Number of Tests	Number of Positives	Total Number of Positives
69	0	0

Calendar year 2018

Number of Tests	Number of Positives	Total Number of Positives
127	0	0

Supplier Facility Program / Audit Requirements

H W Greenham & Sons Est 0234 operates and maintains a Global Food Safety Initiative (GFSI) approved for Food Safety and Good Manufacturing Practice, BRC Version 7 is the standard and is audited annually by an approved 3rd party namely AUS-QUAL Pty Ltd. The most recent audit was conducted on 5th, 6th and 7th June 2018 where the overall plant score was “A+” Next audit due by June 2019

Animal Welfare is also audited in line with AMI Guidelines the 3rd party auditing body is AUS-QUAL Limited. Audits are undertaken annually the most recent audit was conducted on 5th and 6th June 2018 with the plant rated compliant

The H W Greenham laboratory only uses recognised methodology and participates in proficiency testing. As a NATA and DAWR approved laboratory annual audits are conducted by the certifying authorities namely NATA / DAWR. The last scheduled audit was conducted on 24th October 2017 with the laboratory maintaining its accreditation.

Species Testing

H W Greenham & Sons Est 234 is a bovine only operation and participate in a regulatory DAWR species testing program



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Group Quality Assurance Manager
H W Greenham and Sons