



**Tuesday, 29 January 2013**

## **HACCP LETTER OF GUARANTEE**

### **JBS Australia Pty Limited – Dinmore Establishment Number 235**

#### **Export Operations**

Australian export operations are conducted under the regulatory controls of the Department Of Agriculture Fisheries and Forestry (DAFF). DAFF 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**

DAFF Veterinary officers, Food Safety Meat Assessors and Authorised Officers have in addition to disease / health control, a fulltime on Plant role , monitoring / auditing company performance in the discharge of their obligations under DAFF Approved Programs.

#### **Overseas Listing**

Establishment 235 is USA listed and operates under an DAFF Approved Arrangement (AA) program to produce,

- Intact individually wrapped (IW), multi wrapped (MW) and layer packed (LP) Primals, Sub-Primals not intended for grinding
- Bulked packed boneless manufacturing beef, Primals and Sub-Primals that are intended for grinding.

#### **HACCP Plan**

The AA program incorporates HACCP. The HACCP plan contains CCP's which directly address the hazard of Zero Tolerance contamination and the proliferation of Shiga toxin-producing *Escherichia coli*. These are Hygiene trim on the slaughter floor, carcass refrigeration and carton meat refrigeration.

#### **HACCP Reassessment**

HACCP plans have been reassessed in accordance with DAFF Meat Notice 2002/13 and Federal Register Notice 9 CFR part 417 Docket Number 00-022 N dated 7 October 2002 – E.coli 0157:H7 contamination of beef products. DAFF 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 reassessed HACCP Plan reviewed all steps in the process including the following interventions:

- DAFF ante mortem on all livestock pre-slaughter
- Segregation of all sick/ill or injured livestock into separate pens
- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export.
- Cattle identified as heavily soiled are withheld from slaughter until such time that they have been washed and are suitable for slaughter.
- Pre-wash of all cattle prior to slaughter.
- Sealing of weasand by application of a clip to prevent spillage
- Sealing of the bung via bagging to control cross contamination
- The use of a ball tip brisket saw to prevent rupturing of the paunch
- The continuous sterilisation of the evisceration table
- A separate side rail to trim retained carcasses
- All carcasses sides are subjected to a final inspection and hygiene trim
- All carcasse sides are subjected to a hot water decontamination wash (77.5°C – 81.5°C) for duration of 15 seconds prior to exiting the slaughter floor.
- Zero tolerance monitoring criteria, is in place for faecal, ingesta and milk spillage.
- Product hygiene is monitored daily following the DAFF meat hygiene assessment guidelines
- Documented Corrective and Preventative actions are in place and followed
- Microbial testing of contact surfaces, employees equipment, carcasse and carton product hygiene
- Ongoing training of new and old employees.

To reduce, eliminate or control Shiga Toxin-Producing *Escherichia coli*. The efficacy of these interventions is verified by microbiological testing.

### Reassessment Outcome

Shiga Toxin-Producing *Escherichia coli* were hazards reasonably likely to occur if it was not for the effectiveness of the establishments HACCP plan. The conclusion that the CCP's are effective in controlling the hazard is substantiated by an extensive data base of test results from carcasse and boxed product testing conducted over a period of years for *E.coli* O157 H7, including a verification study performed in 2012 incorporating additional STEC's O26, O111, O45, O103, O121 and O145.

### Microbiological Testing

Testing is conducted by an independent external NATA / DAFF approved laboratory which is subject to DAFF auditing and verification testing. The Laboratory maintains ISO/IEC 17025 for ongoing NATA accreditation. Laboratory technicians are qualified to conduct the testing required.

### Process Control Monitoring

Generic E.coli and TVC monitoring is conducted on a daily basis as a process control measure. Results consistently range between Excellent and Good inline with industry recognised standards for:

	Excellent	Good	Acceptable
Generic E.coli	Not detected	1 - 10	10 - 100
Total Viable Count	<1,000	1,000 – 10,000	10,000 – 100,000

**End Product Testing is performed for E.coli O157:H7**

Utilising the AOAC Official method 2005.4 Assurance GDS for E.coli O157 H7 screening test, testing is performed on a test and hold basis allowing full control over the product should a potential positive detection be determined.

**Sampling Plan**

An N=60 sampling plan is carried out on frozen cartons for each consignment. 12 cartons are randomly selected and sampled to make a composite test sample of 375grams.

In the event of a potential positive, all carton products involved are retained under JBS Australia control and DAFF is notified. Confirmatory testing is carried out off site by an approved independent laboratory; Symbio Alliance is the nominated laboratory. Only once confirmatory testing results are known and have determined a negative result will the product be released for shipment.

**Confirmation of Positive Test**

In the event of a confirmed positive result, product remains retained under JBS Australia and DAFF. Disposition of such product is that it is processed by an Approved heat sterilisation Establishment. Records relating to the incident are maintained.

**Current Detection Rates**

Since the HACCP reassessment conducted in November 2002 there has been **40,166** composite samples analysed for Shiga Toxin-Producing *Escherichia coli* which have returned **(18)** confirmed positive tests, giving a year on year detection rate of **0.04%**

Year	# of Test Performed	Positives	Detection Rate %
2012	7,019	8	0.11%
2011	2,039	0	0.00%
2010	2,132	0	0.00%
2009	3,487	2	0.06%
2008	3,345	5	0.15%
1998-2007	22,144*	3	0.01%

\* Unable to breakdown into annual details (files have been archived)

**On Going Minimisation Controls**

In support of HACCP, all production processes have a hygiene / sanitation focus through Standard Operating Procedures, which include the following

- Cleaning and sanitation
- Operational sanitation
- Personal hygiene

*An employee personal hygiene and plant sanitation procedures eliminates the risk of introducing contamination to product from other sources.*

- Temperature Control

*Effective carcass chilling and product handling regimes stop the proliferation and spread of microbiological contamination.*

- Preventative maintenance
- Training
- Internal audits, external audits and third party audits
- Written work instructions on all procedures

Employees adhering to Good Manufacturing Practices such as;

- Hygienic dressing techniques that include (2) knife sterilisation procedures
- Operators in the hide on area wash their hands and arms with warm water and soap between bodies
- Wearing of rubber disposable gloves over mesh and non cut resistant gloves
- The use of spear cuts, for all hides opening cuts
- Hide removal procedures designed to prevent hide rollback.
- Immediate trimming of contamination
- Retain tagging of any carcasses that need further trimming

For any further enquires please contact JBS Australia Pty Limited through your normal commercial channels.

Yours sincerely,  
JBS Australia Pty Limited



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