



STATEMENT OF HACCP COMPLIANCE

8/1/2018

To,whom it may concern.

Establishment **224** is approved by the USDA Food Safety Inspection Service to produce and export beef (Bovine) meat and meat products to the USA.

The company has in place a fully documented HACCP-based quality assurance system incorporated into the Department of Agriculture & Water Resources (DAWR) Approved Arrangements.

THE APPROVED ARRANGEMENT SYSTEM AT ESTABLISHMENT 224:

- Complies with FSIS guidelines for meeting FSIS Pathogen Reduction/HACCP re-assessment
- Is audited daily by on-plant Department of Agriculture & Water Resources (DAWR) Veterinary Officers and Meat Inspectors .
- Is audited monthly by an DAFF Area Technical Manager (ATM)
- Is subject to and passed many detailed Verification/systems audit conducted by DAWR
- Scheduled Aus-Meat Specific Customer Supplier Audits.

Establishment 224 confirms that on an annual basis it has re-assessed its HACCP plan in accordance with the requirements of US Federal Register Notice 9 CFR Part 417 Docket number 00-022N dated 7th October 2002. ***This re-assessment has determined that E. coli 0157:H7 & Non 0157 STECs are hazards that is unlikely to occur due to the implementation of Science Based Pathogen Reduction Intervention procedures into the process as part of the establishments HACCP Plan.***

This determination included verification due to the extensive testing history of products for E.Coli 0157:H7 & Non 0157H7 STECS by Est 224 and DAFF Verification Testing Program for E.Coli 0157:H7 & Non 0157H& STECs..

The re-assessment of the Establishment 224's HACCP Plan conducted on **14-15/12/2017** has been audited and approved by the Department of Agriculture & Water Resources (DAWR).

Implemented Interventions/Procedures:

The HACCP plan at Establishment 224 includes the following interventions to reduce, eliminate, or control pathogens such as *E. coli 0157:H7 & Non 0157H7 STECS* ., 026,045,0103,0111,0121 and 0145 to an un-detectable level.

- **CCP1** . Zero Tolerance Detection Monitoring at carcass Pre-Trim on the slaughter Floor.
- **Steam Vacuum Systems** (2) on both the Hindquarter & Forequarter.
- **Hot carcass Wash followed by Lactic Acid** Carcass Spray prior to Chilling.

E.Coli 0157:H7 & Non 0157H7 STECs Container lot testing of all products destined for grinding. (12 cartons/ 5 samples per carton comprising of 60 samples per Lot). Analytical unit comprising of minimum of 375gm per lot.

- Testing equals FSIS N60 Rule.
- Follow up Monitoring / Verification prior to boning at Boning Room Pre-Trim.

6 CCPs Determined by HACCP Re-Assessment

- CCP 1- High & Low Trim on slaughter / Steam Vacuums
- CCP 2- Carcass Surface Chilling
- CCP 3 - Metal Detection of Comminuted Beef
- CCP 4- Carton Chilling Temperature
- CCP 5 – Frozen Product Temperature
- CCP 6 – Head & Weasand Meat Monitoring – Zero Tolerance- (Faeces, Ingesta and Milk)

PROCESS CONTROL:

- Standard operating procedures for the control of dressing and hygiene standards during slaughtering and dressing to prevent contamination by faeces, ingesta, bile and urine.
- Procedures and SOP's are in place to ensure appropriate corrective action is implemented when contamination occurs to product, ensuring the product is re-assessed and re-worked to an acceptable standard or removed from the human consumption food chain. In depth Zero Tolerance contamination detection procedures have been developed and implemented to ensure that product affected &/or potentially affected by zero tolerance contamination is subject to 100% inspection & testing to ensure the contaminated product is isolated and re-worked where required.
- Boning/Processing/Fabrication Room temperature maintained at, or below 10oC
- Effective implementation, monitoring and recording of Sanitation & Hygiene Standard operating procedures ensuring that all plant work areas and equipment used for processing & fabrication is cleaned prior to use, and cleaned during production
- Effective Implementation, monitoring, and recording of Personal Hygiene Standard Operating Procedures
- Adequate facilities, design and construction of the plant minimize, and prevent cross contamination from airflows.
- Critical control points have been determined, control measures, monitoring and verification and validation procedures are in place and have proven effective control over the temperature of product during chilling, freezing and storage. CCP's are specifically aimed at controlling or reducing food safety hazards such as pathogens, including Ecoli. Docket number 00-022N dated 7th October 2002, and that appropriate controls and interventions are in place to reduce, eliminate or control *E. coli 0157:H7*.
- Meat Hygiene Assessment monitoring procedures are in place ensuring the monitoring, and effective implementation of all Work Instructions, Standard Operating Procedures and Approved Programs in maintaining hygienic work practices and safe handling of product preventing cross contamination.

- All product leading to boning is subjected to a detailed inspection for macro-contamination, in particular Zero Tolerance (Faecal) contamination.
 - All instances of zero tolerance detection are handled in accordance with the detection procedures outlined in the Meat Safety Quality Assurance Manual
- Pre-trimming of all products prior to boning/fabrication ensuring knife trimming of all contamination.
 - Effective implementation, control, monitoring and recording of all Standard Operating Procedures pertaining to storage and product transfer temperatures. Ensuring rapid turnover of product, good process flow ensuring adequate product flow & turnover, product is held under refrigeration whenever any processing delay may be expected.
 - Adequate facilities for rapid freezing of all products are provided reducing the meat temperature to -7°C or less rapidly.
 - Product storage facilities are provided to maintain an ambient storage air temperature of -20°C or less.
 - Pre-shipment review is performed for all product and associated monitoring records prior to shipment, to verify that all product intended for export has met all of the control measures, critical control points and is eligible to enter commerce.
 - Critical limits as set out in the HACCP Approved Arrangement Manual

VERIFICATION OF INTERVENTION EFFICIENCY:

The efficiency of these interventions are verified by microbiological testing for *E. coli* 0157:H7 & Non 0157H7 STECs, Generic *E. Coli* & *Salmonella* (ESAM), Microbiological testing is used to verify the effectiveness of interventions and process controls of both the slaughtering and Boning Operations.

Verification Testing of product for *E. coli* 0157:H7 & Non 0157H7 STECs is performed by an external contract laboratory (ALS Laboratories) using AOAC Official Method 996.09 "VIP for EHEC".

Sampling rate is 12 cartons per 700 container lot. (375g) minimum weight processed intended for grinding in the US.

Each carton has 5 cores removed randomly from each computer generated carton and pallet selection table.

12 cartons, each contain 5 cores (Approx 5-10gm each) making a total of 60 core samples.

This sampling size complies with the FSIS **N60** Sampling Protocol for *E. Coli*:0157 H7 & Non 0157H7 STECs..

Only product compliant with HACCP requirements and has tested negative for *E. coli* 0157:H7 & Non 0157H7 STECs is shipped to the USA.

Due to the reassessment of Establishment 224's HACCP Plan and of its continued effective operation detailed in the information provided here, Establishment 224 has concluded **that *E. coli* 0157:H7 & Non 0157H7 STECs have been reduced to below detectable levels**

MICRO ANALYSIS

For the year **2017**, all samples tested for E.Coli 0157:H7 & Non 0157H& STECs, all were reported as **Negative**. this include s all DAFF Verification Sampling Program test results which have all returned a **Negative Result**.

Should a confirmed positive for **Ecoli 0157:H7 & Non 0157H& STECs** be detected, **All meat from that production lot will under DAFF Retention and be re-directed to a thermal processing establishment and is NEVER exported to the USA or other destinations.**

SPECIFIED RISK MATERIALS (SRM).

Removal of Specified Risk Materials procedures are in place to satisfy and meet the requirements of Food Safety Requirements set down by the USA FSIS in response to the detection of BSE in the US. GBP Australia has installed a Bettcher sytem for the extraction of Spinal Cord and Dura on the slaughter floor.

Even though SRMs such as brain and Dura are now not considered as SRM to the US. Customer requirements still maintain that Rule as being Prohibited.

Prohibited items from entering the US Food chain Include, Tonsils, Entire Small Intestine, Brain, Skull, Eyes, Trigeminal Ganglia, Dorsal root Ganglia, & Vertebral Column.

It has been determined by the HACCP team that *"BSE is a hazard not likely to occur"* at this Plant.

COMPANY OBJECTIVES & MANAGEMENT COMMITMENT:

GBP Australia Pty. Ltd. is a company committed to quality, Conforming to the requirements of Various Foreign Customer Requirements, AUS-MEAT Language , A+ Accreditation Standards and Australian Standards (AS 2007)

Establishment 224 is committed, to implementing and maintaining compliance with the HACCP Plan, Quality Policies, Standard Operating Procedures and Specifications set out in the DAFF Approved Arrangements System Manual.

CONCLUSION.

In determining all of the above, it has been concluded by the HACCP Team that all of the CCPs determined using the Decision Tree selection process, 6 CCPs are maintained in the Quality HACCP system.

During the past 12 months all DAFF Audits have generally found the product hygiene to be of a high standard.

Proper Temperature control has maintained the standard set during processing.

Microbial Testing of Product has further confirmed that the Approved Arrangement has maintained integrity of all products, both during and throughout all elements of Processing.

GBP Australia Pty Ltd believes that its food safety program is set at a high standard, but at the same time, neither we, nor for that matter, anyone is able to guarantee pathogen free raw materials. Accordingly, we want to reiterate the importance of proper handling and cooking of all our raw meat products by our customers.

Yours Sincerely
BILL BATO

A handwritten signature in blue ink, appearing to read 'Bill Bato', is written over a circular stamp or watermark.

Quality Assurance Manager.