

03 January 2020

**Subject: Reassessment of HACCP Plan**

Stanbroke Beef Pty Ltd, registered establishment Number 203, operates under an Australian Government Dept. of Agriculture approved HACCP-based quality assurance program.

Stanbroke Beef has reassessed the HACCP Plan, completed on 23 August 2019, in line with "Federal Register Notice 9 CFR Part 417 Docket Number 00-022N dated 7 October 2002 – *E.coli 0157:H7 Contamination of Beef Products*" and Docket No. FSIS-2010-0023 – Shiga Toxin-Producing *Escherichia coli* in Certain Raw Beef Products.

Review of this HACCP Plan was undertaken from 05/08/2019 and was concluded on 23/08/2019.

This reassessment has determined that STECs may be a hazard likely to occur on incoming cattle.

On completion of this review and in consideration of changes made to process controls, and in conjunction with existing controls as listed below, combined with the assessment of verification and validation data, Stanbroke Beef affirm the following Critical Control Points (CCP 1 Carcase Trimming, CCP Offal Trimming, CCP 3A-E Chilling) and consider that their HACCP Plan and Sanitary Standard Operating Procedures are adequate to control STECs (*E.coli 0157:H7, O103, O111, O121, O145, O26, O45*) and that they are not reasonably likely to occur on carcasses or in the meat produced at this establishment:

Established and Revised Standard Operating Procedures and Work Instructions for control of sanitation and hygiene, sanitary dressing and subsequent processing of carcasses and offals, refrigeration-storage-dispatch of product, combined with corrective and preventive actions

- Changes to procedures combined with enhanced supervision
- Monitoring of designated Critical Control Points
- Meat Hygiene Assessments of processes and products with attendant corrective and preventive actions
- Microbiological control programs including product, personal hygiene, equipment and contact surfaces
- The ESAM (*E.coli-Salmonella*) program as an indicator of sanitary dressing
- Inclusion of STEC Testing as part of the HACCP Plan Validation
- Microbiological (*E.coli 0157:H7*) monitoring as part of our HACCP verification
- Evaluation of Refrigeration Index Criteria for Refrigeration Process CCP for the past 12 months against compliance standards
- Pre-shipment Reviews to confirm that Critical Limits at each Critical Control Point have been met and, where critical limits were not met, appropriate corrective and preventive action has been taken with proper disposition applied to affected product.

Controls and systems that provide sustained performance include:

- A cattle producer base operating with strong emphasis on quality assurance systems on farms and livestock transport
- Pre-Slaughter washing of cattle
- Daily assessments of cattle cleanliness preceding acceptability for slaughter
- Non-ambulatory livestock are segregated and humanely slaughtered as retained lots
- Oesophageal plugging and clipping to control ingesta spillage and contamination
- Bagging and sealing of bungs to prevent spillage contamination from intestinal and urogenital tracts
- Defined sanitary dressing procedures by slaughterfloor staff
- Effective hand washing, knife and equipment sterilization practices between high risk tasks and between carcasses
- All carcase sides are subjected to a final inspection and hygiene trim following hide removal and preceding chilling.

- Defined personal hygiene practices throughout production departments
- Carcase hygiene inspections by QA Officers preceding chilling
- Specified Chilling and Freezing programs to control microbial growth
- Documented Corrective and Preventative actions are in place
- Microbial testing of contact surfaces and product

**E.coli 0157:H7 Sampling**

Stanbroke Beef conducts microbiological monitoring of carcasses for generic E.coli and Salmonella and subsequent testing of boneless beef for E.coli 0157:H7 based on an N-60 sampling plan. A minimum of 12 carton equivalents per 700 of product destined for grinding are sampled, comprised of a minimum of 31.25g sampled from at least 5 pieces drawn from different areas within each carton (i.e. 12 x 5 pieces = N-60).

A minimum of 375g is tested for E.coli 0157:H7 in an Australian Government Dept. of Agriculture approved laboratory by an Australian Government Dept. of Agriculture approved test method (Assurance GDS and Bax RT)

Only product from which an STEC has not been detected is released to the market.

**Quarterly Test Results – E. coli O157:H7 - Progressive Reporting for 2019**

Calendar Year 2019	No. of Tests	Number Confirmed Positive
1 January - 31 March	242	0
1 April – 30 June	330	1
1 July - 30 September	448	0
1 October - 31 December	370	1

**Bovine Spongiform Encephalopathy Controls**

Est. 203 has BSE control measures in place for products supplied to the US human food chain:

- Australian legislation prohibits the feeding of all Restricted Animal Materials to ruminants, including cattle
- Any animal tested for BSE is excluded from our raw material until animal is cleared
- Australian standards prohibit the feeding of meat and bone meal products to any ruminant animals
- Non-ambulatory, disabled cattle are excluded from the US food chain
- Prohibition on the use of captive bolt stunning devices that actively inject air into the brain cavity.

Stanbroke Beef recognizes the importance of consumer insistence on food safety and is committed to the operation of a quality system that contributes to product food safety, integrity and customer acceptance.

Paul Gillespie B.V.Sc

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Stanbroke Beef Pty Ltd