PRIMO AUSTRALIA
SCONE ABATTOIR
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3rd September 2010

HACCP COMPLIANCE
PRIMO AUSTRALIA SCONE ABATTOIR

Primo Australia Scone Abattoir certifies that the establishment has a HACCP based Food Safety Program

The HACCP program and the reassessment of the program are approved by the Australian Quarantine Inspection Service (AQIS)

AQIS is responsible for auditing the establishments HACCP based program to ensure that it is reassessed in accordance with the Federal Register Notice 9 CFR Part 417 Docket Number 00-022N dated 07 October 2002 – *E.coli O157:H7 Contamination of Beef Products.*

Primo Australia Scone Abattoir reassesses its HACCP plan annually or whenever there has been alterations or additions to the process. The last reassessment was carried out in May 2009.

The reassessment of the HACCP plan has considered *E.coli* O157:H7, as a microbiological hazard that is not likely to occur in product produced at this establishment.

The reassessment of the HACCP plan has identified several intervention steps intended to prevent contamination of product from *E.coli* O157:H7 and other pathogens likely to occur during processing.

Intervention steps are listed on the follow attachment A. These steps have been written into work instructions and Standard Operating Procedures (SOPs).

Microbiological testing of carcases (ESAM) during processing and further testing of manufacturing meat destined for grinding forms part of the HACCP Plan verification.

Further testing of packaged manufacturing meat for *E.coli* O157:H7 is carried out according to AQIS Meat Notice 2008/05. This procedure applies to all beef bulk trim packs and other bulk packs such as primal and sub primal cuts destined for grinding in the USA and Canada.

A lot at this establishment is defined as comprising of all cartons produced within a production day and does not exceed 700 cartons. Twelve (12) cartons are sampled across the days production which constitutes as a lot. Five slices of surface meat are removed from each carton, (a total of 60 slices from the 12 cartons i.e. 12 x 5 = 60). Each slice weighs between 5 and 10 grams. The total sample weight from the 12 cartons weighs a minimum of 375 grams. The samples are taken from the carton after packing, prior to weighing and lidding. After collection, samples are stored in the refrigerator @ 4°C before being packaged and sent to an AQIS approved NATA accredited laboratory. A screen test is conducted at the laboratory and further testing is carried out if required. This is a test and hold procedure, no product is released into the market place until test results are back. If there is a positive detection of *E.coli* O157:H7 this product is then diverted to a heat treatment facility or destroyed through our on site rendering plant. Verification testing is carried out nationally by AQIS according to AQIS Meat Notice 2008/05.
From 2008 to the present date (3/9/10), 776 samples have been collected for E. coli O157:H7. Within that timeframe, 3 samples have tested positive in 2008, 2 samples tested positive in 2009 and no samples have tested positive for 2010. Product in which E. coli O157:H7 has been detected was controlled by AQIS. The disposition outcome being that this product was heat treated.

Australia meets international requirements for a Bovine Spongiform Encephalopathy (BSE) negligible risk country. This has been confirmed by national and international risk assessments, for example those conducted by the Food Standards Australia New Zealand, the New Zealand Food Safety Authority and the European Food Safety Authority. An assessment by the OIE was released in May 2007 and concluded that Australia met the requirements for a 'negligible BSE risk' country. Despite Australia's BSE status, controls are in place to ensure that Specified Risk Materials (SRM) do not end up in the food chain. These controls are covered within our SOPs and Work Instructions. Australia has a national ban on feeding ruminants any ruminant products. All animals slaughtered at this establishment have met the Australian feeding requirements and therefore no animal has been fed ruminant by products.

Animal welfare is a fundamental requirement in order to slaughter animals at this establishment. There is an overriding responsibility to ensure that animals presented for slaughter as a food source are treated humanely and that they do not experience avoidable stress due to pain or suffering. Predisposing factors prior to and during transport of animals significantly affect the subsequent handling and care of animals at the abattoir. The humane handling of animals at the abattoir from receival to slaughter must consider the state of the animals, the need for feed and water, the manner of moving animals, where they are held and the class of animals in the lot. In addition to the animal welfare responsibilities, pre-slaughter handling of livestock affects meat quality and the production of wholesome product. Downer animals are assessed by the On Plant Veterinary Officer (OPVO) and may be slaughtered as an emergency animal, the meat and meat products from these animals is not allowed into the US or Canadian food chain and control measures have been established to ensure this.

All animals slaughtered on our establishment are accompanied by a National Vendor Declaration (NVD); this document is a declaration from the producer regarding the use of veterinary chemicals and drugs and appropriate withholding periods after administration.

A pre-shipment review of records relating to HACCP and supporting programs is conducted daily by the Quality Assurance Manager to confirm that only product that has tested negative for E.coli O157:H7 and that is compliant with our HACCP program is shipped to the U.S.A.

Primo Australia Scone Abattoir is committed to producing quality; food safe product through strict adherence to all elements of its HACCP based Food Safety Program.

Regards,

Peter Taylor,
QA Manager,
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Attachment A

The following is a list of intervention steps introduced to prevent contamination of carcasses during processing from *E.coli O157:H7*

**Livestock Receival and Handling**
- Cattle undergo ante mortem inspection prior to slaughter by authorised AQIS officer
- Lairages are kept clean, pens hosed out between individual lots and race ways hosed as necessary to remove zero tolerance contamination
- Cattle are handled quietly and humanely prior to and during lairage to avoid stress
- Cattle are washed prior to slaughter to ensure hides are free from zero tolerance contamination when presented for slaughter. In addition, cattle receive a final potable body wash to dampen hair to avoid fall out from hide during processing
- Documentation is maintained to ensure tractability
- A Quality Assurance Officer and Supervisors monitor procedures from cattle Receival to stunning

**Slaughter Floor Operations**
- Control of the chain speeds, manning levels and operators training are adhered to
- All dressing procedures are preceded by operator washing hands with soap and water and sterilising knives and equipment in 82°C water
- Oesophageal occlusion plugs are inserted prior to hoisting
- Two knife sterilisation are used in all hide opening procedures
- Operators are trained using work instructions designed to eliminate contamination of carcasses
- The bung is bagged and pushed into the abdominal cavity prior to the removal of the hide
- The hide is removed avoiding contact with the dressed carcass
- A ballpoint brisket saw blade is used to avoid rupturing the paunch
- Carcasses contaminated during evisceration are tagged and trimmed on the retain rail to remove visible zero tolerance contamination
- Carcasses are inspected by an authorised AQIS officer
- All carcases are inspected and trimmed to ensure no visible zero tolerance remains on the carcase prior to leaving the slaughter floor
- A Quality Assurance Officer and Supervisor monitor all slaughter floor procedures and product from slaughter floor to carcase chilling

**Chilling Operations**
- Carcases enter the chiller within 2 hour of slaughter
- Carcases are spaced to allow for air flow during chilling
- Carcases are chilled to 7°C surface temperature within 24 hours of slaughter

**Boning Operations**
- Boning room temperature is maintained at or below 10°C
- Carcasses are inspected and trimmed prior to boning to ensure no visible zero tolerance contamination remains on the carcase
- Product is under active refrigeration within 2 hours of boning
- Chilled product is reduced to 5°C within 24 hour of boning
- Chilled product is stored between 0°C and -2°C
- Frozen product is stored at or below -18°C

<table>
<thead>
<tr>
<th>List of Critical Control Points within the HACCP Plan</th>
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<tbody>
<tr>
<td><strong>CCP 1</strong> Beef Slaughter Floor Hygiene Trim</td>
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<td>including retain rail</td>
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<tr>
<td><strong>CCP 2</strong> Initial Chilling of Beef Carcases</td>
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<tr>
<td><strong>CCP 3</strong> Refrigeration of Offal and Meat</td>
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</tbody>
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Supporting Programs

- Security Program
- Personal Hygiene
- Cleaning and Sanitation
- Control of Hazardous Substances
- Pest Control
- Waste Control
- Water Supply
- Meat Hygiene Assessment
- Internal Audit
- Product Identification – Product Recall
- Animal Welfare
- Training
- Calibration
- Corrective and Preventative Action
- Management Review
- Refrigeration Control
- Purchasing
- Control of Specified Risk Materials
- Sampling Programs
- Sourcing Animals for Slaughter
- Document Control
- HACCP Procedures
- Importing Country Requirements
- Foreign Object Control
- Slaughter and Dressing of Beef