



# **NUEVO CARNIC S.A.**

*Tu matadero amigo*

January 3<sup>rd</sup>, 2011.

## HACCP LETTER OF ASSURANCE

### **HACCP Plan Assessment (Compliance to FSIS Notice 65-07)**

Nuevo Carnic, S.A. undertakes re- assessments of the HACCP system on a continuing basis in accordance with the terms that includes an annual re- assessment in compliance with the requirements set down by FSIS within US federal Register Notice 9 CFR Part 417 and Law N° 291 of Animal Health of MAG-FOR, which states as mandatory the application of a HACCP Plan in all Meat Exporting Establishments.

The effectiveness of critical control points and other control measures within the HACCP reassessment are addressed to assure:

- The Meat Inspection Services personnel of the Plant conduct an Ante-mortem check on all cattle prior to slaughter.
- A separate pen is provide to isolate suspect and sick or injured animals.
- The prevention of primary and secondary contamination on carcasses through best practice procedures in the presentation of cattle for slaughter and in the dressing of beef carcasses;
- The inspection of all carcasses to detect and remove any zero tolerance defect on carcasses prior to leaving the slaughter floor;
- The elimination of potential pathogen growth on carcasses through validated refrigeration practices.
- Our Plant Nuevo Carnic, S.A is operating with a validated HACCP Plan (see photocopy of The Official Certificate- MAG-FOR). In our plant we have three Critical Control Points (CCP) in three separate steps in the process:
  - PCC 1 : During step of evisceration.
  - PCC 2: During step of spraying to all carcasses with acetic acid (2.5 %).
  - PCC 3: During step of chilling the carcasses within chillers.

The current microbiological controls and verification activities are described below:

- Washing animals pre slaughter with potable and high pressure water, to remove soiled fecal material.
- Occlusion of the oesophagus with a plastic plug prior to hoisting into the dressing position and further sealing by rodding and attaching a plastic clip.
- A dual knife system is used on all tasks prior to hide removal.
- The bung is sealed with a plastic bag and elastrator ring to prevent spillage.

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- The use of a ball tipped blade on the brisket saw to eliminated puncturing of the paunch.
- The continuous sterilization of the evisceration track with 180 ° F water.
- Trimming of any contamination.
- Individual inspection of each of the carcass discarding visible fecal.
- Meat Hygiene Assessment is made of dressed carcasses with zero tolerance criteria for feces, ingesta and milk with attendant corrective and preventive actions as required to reduce, eliminate or control *Generic E.coli* and *E. coli O157:H7*. The efficacy of these interventions is verified by microbiological testing.
- The establishment has in place a microbial intervention which consist of an organic acid spray system, which sprays 100 % of the carcasses in the slaughter floor. The organic acid used is Acetic acid 2.5 %, as recommended in the FSIS Directive 7120.1 Amendment 1- Safe and Suitable Ingredients Used in the Production of Meat and Poultry Products.
- Official testing by the MAG-FOR, Ministry of Agriculture and Forest includes testing of carcasses for *Generic E. coli*, *E. coli O157:H7*, *Salmonella spp.*

## **E. COLI O157:H7 ROUTING SAMPLING PROTOCOL**

- **Production Lot: For this procedure:** a production lot is a sub-lot derived from beef processed on a single day.
- The sub-lot is defined as 10,500 pounds of bovine products that are considered to be raw ground beef components as defined in FSIS Notice 68-07- of October 26, 2007. The sub-lots are equivalent to no more than 175 boxes of 60 pounds each, produced on a specific production date. The production sub-lots are identified with letters of the alphabet as follows; sub-lot A, sub-lot B, sub-lot C etc. depending on the number of sub-lots produced on that date.
- The Meat Inspection Services of the Nicaragua Ministry of Agricultural and Forestry (Ministerio Agropecuario y Forestal- MAGFOR) will perform tests to verify the presence of *E. coli O157:H7* on each production sub-lot destined to be ground in the USA.

## **ROUTINARY SAMPLING**

- The establishment's officials will run test for the detection of the *E. coli O157:H7* using N 60 procedures and supervised by MAG-FOR inspectors who verify the daily results reported.
- The samples are analyzed in an approved laboratory assigned by the Nicaraguan Ministry of Agriculture and Forestry (MAG-FOR), and all the results will be reported directly to the Meat Inspection Services of MAG-FOR.

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- The sub-lots that are being sampled will be retained and released until the results are obtained and are negative for the presence of E. coli O157:H7.
- **Presumptive Positive Sample:** A sample is a presumptive positive when the analytical steps for microbial analysis indicate the strong possibility of E. coli O157:H7 presence, but additional analysis are need to confirm the presence or absence of the organism.
- Confirmation test (MLG 5.04) should immediately be performed at the official MAG-FOR Laboratory. The production sub-lot would be kept under the government (MAG-FOR) control until the results of the confirmation test are received.
- In case of a positive E. coli O157:H7 sample, the official inspectors from the Meat Inspection Services (MAG-FOR) would perform an intensified sampling for the following consecutive 16 production days following the procedure describe in the FSIS Notice 66-07. The frequency of the sampling would be double that described for routine sampling.
- In the remote case of another lot with a confirmed positive, the Meat Inspection Services (MAG-FOR) will issue a report of non compliance to the affected establishment. If the confirmation test is negative then the production sub-lot would be released to the market.
- The production sub-lots with confirmed positives for E. coli O157:H7 will be under the supervision of the Nicaraguan Meat Inspection Services and will be eliminated by condemnation or rendering.
- The E. coli sample size is (325 ± 10 g) that is representative of the entire sample. The test used is the NEOGEN Reveal E. coli O157:H7, N° 2000.14, 20 hours enrichment (AOAC Official Method ) for a quick result and the confirmatory test is the MLG 5.04 for detection, isolation and identification method for E. coli O157:H7. Both methods are approved by the FSIS/ USDA.

As well as the above items mentioned the following procedures are observed:

- Establishment Standard Operating Procedures and Work Instruction for control of sanitation and hygiene.
- Microbiological control programs for personal hygiene, equipment and contact surfaces and pre-shipment review procedures.

#### **Control of SRM's (Compliance to FSIS Notice 56-07)**

- Since 2004, Nuevo Carnic, S.A., included in the process the procedures to remove, segregate and dispose the SRM's, to assure that all the products exported to the United States are free of SRM's and safe for human consumption.

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- Non- ambulatory animals are not permitted to enter the slaughter floor. These animals are humanely slaughtered on site and brain samples are collected by the official veterinary to analyze for BSE.
- All the ambulatory animals are slaughtered with a non- penetrative pneumatic stunner which leaves the brain intact to prevent a contamination of brain SRM's to the rest of the carcass.
- Carcasses that are processed as older than 30 months of age, the Spinal cord and tonsils are completely removed. The rest of SRM's are dispose and sent to the incinerator. The tonsils and the distal part of the ileum of all animals are removed and sent to the incinerator.
- The products exported to the United States are either boneless or with bones that are NOT from the vertebral column or from animals less than 30 months old.
- Nuevo Carnic, S.A., has taken all the measure to assure that there is NO cross contamination of SRM's with the carcasses.
- Any animal tested for BSE is excluded for slaughter and is condemned and incinerated.
- Nicaragua standard prohibit the feeding of meat bone meal (MBM) to any ruminant animal.
- All "downer" cattle are excluded for slaughter and are condemned and incinerated.
- Air injected stunning is not to use in our slaughter process.
- No specified risk material is allowed in our raw material.
- Animals are handled and slaughtered in accordance with Nicaragua Standard Welfare standards which include ante and post mortem inspection.

## **Recall**

We states that our Plant (Nuevo Carnic, S.A) has effective recall/ withdrawal capabilities which is included in our HACCP Plan.

## **Conclusion:**

In light of outcomes from the HACCP re- assessment process and from an analysis of microbiological testing data our Plant Nuevo Carnic, S.A. has concluded that Generic E. coli, E. coli O157:H7, Salmonella and others contaminants are below detectable levels in boneless manufacturing beef produced at the establishment.

Yours sincerely,

Dr. Augusto Meléndez

HACCP Director



Ing. José Daniel Núñez

General Manager



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