



**Monday, 14 February 2011**

**HACCP LETTER OF GUARANTEE  
JBS Australia Pty Limited – Brooklyn Establishment Number 688**

**Export Operations**

Australian export operations are conducted under the regulatory control of the Australian Quarantine and Inspection Service (AQIS). AQIS 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 Control**

AQIS veterinary officers and meat inspectors have in addition to disease and health control, a fulltime on plant role, monitoring / auditing company performance in the discharge of their obligations under AQIS Approved Programs.

**Overseas Listing**

Establishment 688 is USA listed and operates under an AQIS Approved Arrangement (AA) program to produce

- Intact individually wrapped (IW), multi wrapped (MW) and layer packed (LP) Primals, Sub-Primals not intended for grinding.
- Bulk 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 E.coli 0157:H7.

**HACCP Reassessment**

HACCP plans have been reassessed in accordance with AQIS 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.

**Reassessment Outcome**

E.coli 0157:H7 is a hazard 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 carcase and boxed product testing conducted over a period of years.

**Microbiological Testing**

Testing is conducted by an independent external laboratory which is subject to AQIS auditing and verification testing. 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 0157:H7

Utilising the Biocontrol VIP EHEC AOAC Official Method 996.09 E.coli 0157:H7 screening test, testing is performed on a test and hold basis allowing full control over the product should a positive detection be made.

### 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 presumptive positive, all of the grinding products involved are retained and AQIS is notified. Confirmatory testing is carried out off site by an approved independent laboratory; Microbiological Diagnostic Unit (MDU) public health laboratory is the nominated laboratory.

### Confirmation of Positive Test

In the event of a confirmed positive result, product remains retained under AQIS and Company control. Disposition of such product is that it is processed by heat sterilisation in Australia. Records relating to the incident are maintained.

### Current Detection Rate for E coli 0157:H7.

Establishment 688 has had an E.coli O157:H7 testing program in place since 2004 since testing began 10,364 tests have been performed with (9) positive detections, giving a detection rate of 0.086% Testing by year breaks down as follows.

Year	# of Test Performed	Positives	Detection Rate %
2010	1198	6	0.50%
2009	668	1	0.14%
2008	586	1	0.17%
2007	1904	0	0.00%
2006	2052	1	0.04%
2005	2923	0	0.00%
2004	1033	0	0.00%

### On Going Minimisation Controls

In support of HACCP, all production processes have a hygiene / sanitation focus through Standard Operating Procedures. Commencing with the cleanliness of livestock presented for slaughter, hygienic dressing techniques that includes (2) knife sterilisation. Operators in the hide on area wash their hands with warm water and soap between bodies. Effective carcass chilling and product handling regimes stop the proliferation and spread of microbiological contamination. An employee personal hygiene and plant sanitation procedure eliminates the risk of introducing contamination to product from other sources.

Yours sincerely,  
JBS Australia Pty Limited



Michael Johnston  
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