Tuesday, 16th January 2018

JBS Australia Pty Limited - Rockhampton Establishment Number 384

Export Operations

Australian export operations are conducted under the regulatory controls of the Department Of Agriculture. The Department Of Agriculture 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 Controls

Department of Agriculture Veterinary officers, Food Safety Meat Assessors and Authorised Officers have in addition to disease / health control, a fulltime on Plant role , monitoring / auditing company performance in the discharge of their obligations under Department Of Agriculture Approved Programs.

Overseas Listing

Establishment 384 is eligible to export to numerous overseas countries including the USA and Canada and operates under a Department of Agriculture Approved Arrangement (AA) program to produce,

- Intact individually wrapped (IW), multi wrapped (MW) and layer packed (LP) Primals, Sub-Primals not intended for grinding
- Bulked packed boneless manufacturing beef, Primals and Sub-Primals that are intended for grinding.

For further information on EST 384 overseas market eligibility please contact JBS Australia through your normal commercial channels.

HACCP Plan

The AA program incorporates HACCP. The HACCP plan contains CCP's which directly address the hazard of Zero Tolerance contamination and the proliferation of Shiga toxin-producing *Escherichia coli.* These are Hygiene trim on the slaughter floor, carcass refrigeration and carton meat refrigeration.

HACCP Reassessment

HACCP plans have been reassessed in accordance with DAFF 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. DAFF MAA 1231 – United States of America – Management of Shiga Toxin-Producing *Escherichia coli* in Beef intended for Grinding, this included the hazard consideration within the HACCP plan of the additional non O157 STEC's being, O26, O111, O45, O103, O121 and O145.

The reassessed HACCP Plan reviewed all steps in the process including the following interventions:

- DAFF ante mortem on all livestock pre-slaughter
- Segregation of all sick/ill or injured livestock into separate pens

- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export.
- Cattle identified as heavily soiled are withheld from slaughter until such time that they have been washed and are suitable for slaughter.
- Pre-wash of all cattle prior to slaughter.
- Sealing of weasand by application of a clip to prevent spillage
- Sealing of the bung via bagging to control cross contamination
- The use of a ball tip brisket saw to prevent rupturing of the paunch
- The continuous sterilisation of the evisceration table
- A separate side rail to trim retained carcasses
- All carcases sides are subjected to a final inspection and hygiene trim
- Zero tolerance monitoring criteria, is in place for faecal, ingesta and milk spillage.
- Product hygiene is monitored daily following the DAFF meat hygiene assessment guidelines
- Documented Corrective and Preventative actions are in place and followed
- Microbial testing of contact surfaces, employees equipment, carcase and carton product hygiene
- Ongoing training of new and old employees.

To reduce, eliminate or control Shiga Toxin-Producing *Escherichia coli*. The efficacy of these interventions is verified by microbiological testing.

Reassessment Outcome

Shiga Toxin-Producing *Escherichia coli* were hazards 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 for *E.coli O157 H7*, including a verification study performed in 2012 incorporating additional STEC's O26, O111, O45, O103, O121 and O145.

Microbiological Testing

Testing is conducted by an independent external NATA / Department of Agriculture approved laboratory which is subject to Department of Agriculture auditing and verification testing. The Laboratory maintains ISO/IEC 17025 for ongoing NATA accreditation. 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 AOAC Official method 2005.4 Assurance GDS for E.coli O157 H7 screening test, testing is performed on a test and hold basis allowing full control over the production lot should a potential positive detection be determined.

Department of Agriculture Verification testing

The Department of Agriculture conducts a monthly STEC (top7) testing of raw ground beef components intended to be exported. Testing is performed on a test and hold basis allowing full control over the production lot should a potential positive detection be

determined. Sample analysis is performed in an independent third party laboratory selected and approved by the Department of Agriculture.

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 potential positive, all carton products involved are retained under JBS Australia control and the Department of Agriculture is notified. Confirmatory testing is carried out off site by an approved independent laboratory; Symbio Alliance is the nominated laboratory.

Only once confirmatory testing results are known and have determined a negative result will the product be released for shipment.

Confirmation of Positive Test
In the event of a confirmed positive result, product remains retained under JBS Australia and the Department of Agriculture. Disposition of such product is that it is processed by an approved heat sterilisation establishment located in Australia. Records relating to the incident are maintained.

Current Detection Rate's
The table below sets out the plants last 8 years of production, detection rate/s.

Year	# of Test Performed	Positives	Detection Rate %
Totals	**20,053**	**12**	**0.08%**
2017	4224	7	0.17%
2016	3237	2	0.06%
2015	5813	0	0.00%
2014	4378	4	0.08%
2013	2943	3	0.10%
2012	2212	2	0.09%
2011	446	0	0.00%
2010	876	2	0.22%
2009	993	1	0.10%
2008	734	0	0.00%

*Note: * Top 7 STEC testing has been in place since 2012.*

On Going Minimisation Controls
In support of HACCP, all production processes have a hygiene / sanitation focus through Standard Operating Procedures, which include the following

- Cleaning and sanitation
- Operational sanitation
- Personal hygiene

An employee personal hygiene and plant sanitation procedures eliminates the risk of introducing contamination to product from other sources.

- Temperature Control

Effective carcase chilling and product handling regimes stop the proliferation and spread of microbiological contamination.

- Preventative maintenance

- Training
- Internal audits, external audits and third party audits
- Written work instructions on all procedures

Employees adhering to Good Manufacturing Practices such as;

- Hygienic dressing techniques that include (2) knife sterilisation procedures
- Operators in the hide on area wash their hands and arms with warm water and soap between bodies
- Wearing of rubber disposable gloves over mesh and non cut resistant gloves
- The use of spear cuts, for all hides opening cuts
- Hide removal procedures designed to prevent hide rollback.
- Immediate trimming of contamination
- Retain tagging of any carcasses that need further trimming

For any further enquires please contact JBS Australia Pty Limited through your normal commercial channels.

Yours sincerely,
JBS Australia Pty Limited

Michael Johnston
Manager Food Safety and Quality Assurance