

Minerva Foods

PULSA S.A. Est. N°7

Melo, 8th January 2018

USA and CANADA STATEMENT OF COMPLIANCE

1. PUL (Establishment N°7) is approved by US Food Safety and Inspection Service (FSIS) to produce for export of bovine meat and bovine offal .We certify that our programs and operations comply with all applicable USDA-FSIS regulations and that incoming cattle comply with all applicable FDA and USDA regulations . At the same time requirements for export to Canada have been met.i.e. The meat derived from bovine, considered as precursor material for the preparation of finished raw ground meat, is tested for the presence of *E. coli* O157:H7/NM according to procedures described in CFIA Annex O of Chapter 4 of the Meat Hygiene Manual of Procedures.
2. In the Federal Register, Vol. 61, N° 144, 25 July 1996 FSIS released the PR/HACCP Rule (also referred to as the MegaRegs). The Pathogen reduction (PR) component mandated a program of bacteriological testing of bovine carcasses for presence of *Escherichia coli* and *Salmonella* spp bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.
3. The company has in place a fully documented HACCP-based quality assurance system
This program:
 - Complies with uruguayan Ministry MGAP guidelines for meeting FSIS Pathogen Reduction /HACCP requirements; and
 - is audited by on-plant MGAP supervisors;
 - audited at least each month by external MGAP officers; and
 - has been subjected to a detailed verification audit by external MGAP auditors and found to meet MGAP and FSIS requirements; and
 - was most recently audited by FSIS officers and accepted as satisfactory.
4. In the last two years , *Salmonella* has not been detected in any randomly selected carcass sample tested.
- 5 In relation to *E. coli* O 157: H7, establishment 7 confirms that its HACCP plan has been reassessed In accordance with Federal Register Notice 9 CFR Part 417 Docket Number 00-022N dated 7 October 2002 and titled *E.coli* O157:H7 Contamination of Beef Products. The HACCP Team concluded , and the Senior Management Team agrees, that *E. coli* O157:H7 may be a hazard reasonably likely to occur in its products without the implementation of the HACCP plan .The effective implementation of the HACCP plan and the SSOP the hazard has been effectively controlled. The MGAP technical inspection service, and FSIS inspector have recently audited and approved the establishment HACCP plan.
- 6 The reassessed HACCP plan includes the following interventions and other measures:
 - Pre-slaughter practices include as principal remove mud and other contaminants from hides and hooves of the cattle.
 - Livestock pens capacity are enough to hold a single days' kill.
 - Holding pens, are in good repair , properly curbed, and well rained with liquid wastes delivered to the plant waste water system
 - Holding pens are located effectively separated from the slaughtering department, by full-height partitions of impervious material to avoid dust , odour and contamination of the slaughtering area
 - Washing or rejection of cattle with heavy hide faecal contamination(verified by inspection of hide-on carcasses by Quality Assurance Staff)
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- Occlusion of the oesophagus after stunning and/or bleeding (verified by observation by Quality Assurance Staff of nominated operatives carrying out their work procedures)
- Use of 2 knives for hide removal procedures(verified by observation by Quality Assurance Staff of hide removal Operatives carrying out their work procedures)
- Identification, using tags, of carcasses where faecal /ingesta leakage is suspected or occurs before dressing procedures which prepare for removal of the gastrointestinal tract(verified by observation by Quality Assurance Staff of nominated Operatives carrying out their work procedures)THIS IS THE CRITICAL CONTROL POINT 1
- Tagged carcasses subjected to intensified inspection and, where necessary, intensified trim and operational sanitation procedures prior to chilling (verified by observation by Quality Assurance Staff of nominated Trimmer carrying out his/her work procedures)
- Carcasses are chilled. Cooling (chilling or freezing) of offals and boned meat is according to the time/temperature requirements of the Uruguayan Government's Export Meat Orders .

- 7 The efficacy of those interventions are validated by microbiological testing of de boned product for E.coli O157:H7 at the rate of 5 cartons randomly sampled per lot each production day, of beef for grinding nominated by Customers for export to USA, and test is done according to the MLG 5.00, and MLG 5.05 from USDA, N=60 sampling program. The methodology is also according to the Uruguay approved system. The lots are defined from one production date, sampling according to the product (each lot is from the same production date, and may include only one product and one shift, according to their common production line and way of preparing).
Each lot may not exceed 1000 cartons from the same production date.
For example : LOT 08040701: includes trimming 85 CL from the first shift.

From 1999, 103386 samples , taking as test each lot of composite of 60 pieces from 5 different cartons (samples) of meat for grinding, sampled have been tested for E. coli O157:H7 in PUL and none has returned a positive detection of E. coli O157:H7.If a positive detection were made, procedures are in place to prevent shipment of product. Only product that is compliant with HACCP requirements and tested negative for E. coli O157:H7 is shipped. Reassessment has been done according to FSIS Notice 65/07.

The intervention in slaughter is done, by the operators at the production line, who are trained to mechanically remove from the meat any kind of contamination and this is validated:

- a-by the PCC1's monitoring and registering, and the verification of the monitoring and registers.
- b-By the number of analysis already done since 1999, and have been found 100% negative.
- c-By the official sampling and testing for E coli O157:H7, that has also been 100% negative

- 8 According to USDA BSE SRM Regulations, we are working since January 2004, as Reg. At 9CFR 310.22. We do not export bone in meat to USA, and all products listed as SRM (brain, skull, eyes trigeminal ganglia, spinal cord), are treated in a separated boiler, and does not go with the rendering ordinary production

