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Melo, 2nd October 2016
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 Q 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, 95221 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 O157H7.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

A Minerva Foods company

STATEMENT CONCERNING BEEF PRODUCTS PRODUCED FOR USA/CANADA

All products from FRIGORIFICO PUL are produced under MGAP of Uruguay Inspection, for establishment number 7, and this is number used for USA,CANADA and all the Countries. Product is guaranteed on the date of shipment to be wholesome and not adulterated or misbranded.

PUL is committed to providing its customers and consumers with the most wholesome and highest quality beef products possible. To this effect, we have adopted policies and procedures that ensure that the highest standards are met.
Animal Handling and Identification Policy

Frigorifico PUL is committed to the safe, humane treatment of all animals that are received at this facility. Every effort will be made to maintain the identity of each animal and to insure its proper identification and disposition according to USDA Regulations.
Frigorifico PUL does not accept delivery of non-ambulatory animals. All non ambulatory animals are condemned and disposed of in accordance with USDA FSIS Regulation 9CFR Part 309.13 and Directive 6900.1

MGAP Uruguay has prohibited since 10 years ago, the feeding of mammalian protein materials in ruminant animals and proper administration of veterinary/drug in cattle Certification Policy

Frigorifico PUL maintains signed affidavits from all parties presenting animals for slaughter certifying that, to the best of his/her knowledge, none of the livestock presented for slaughter at PUL are adulterated within the meaning of the National Program of Residues., and MGAP. (i.e. none of the cattle or other ruminants have been fed any feed containing protein derived from mammalian tissues, e.g., meat and bone meal, and none of these animals presented for slaughter has illegal levels of drug residues)".

Food safety initiatives

Bovine Spongiform Encephalopathy specified risk materials
USDA FSIS 9 CFR Part 310.22(Docket N° 0251F)

On January 12, 2004 USDA published new standards for Specified Risk Materials (SRMs) in the Federal Register. All beef products produced by Frigorifico PUL after January 12, 2004, do not contain SRM s as defined by these new standards.(FSIS Notice 56-07)

In all the farms that send animals to Frigorifico PUL if it happens to appear any downers (animals too sick or injured to move) they are taken out of the farm immediately.

In accordance with the USDA FSIS Rules, Frigorifico PUL has reassessed our HACCP plan and has implemented several control measures and procedures to address the removal and disposal of Specified Risk Material (SRMs) for Bovine Spongiform Encephalophaty (BSE)

. All SRMs are segregated from human food and discarded to INEDIBLE rendering:

The spinal cords are removed from all carcasses
The small intestine is discarded from all carcasses
The Skull including brains, eyes and trigeminal ganglia are discarded from all carcasses.
The tonsils are removed from all cattle

. In order to ensure the complete removal of the dorsal root ganglia, the vertebral column of the cattle aged 30 months, and older (excluding the vertebrae of tail, the transverse processes of the thoracic and lumbar vertebrae and the wings of the sacrum) will be removed during fabrication and discarded to INEDIBLE RENDERING.

Pul

A Minerva Foods company

. Carcasses are segregated according to age based on the guidelines presented in FSIS Notice 56-07 to ensure proper disposal of SRMs from cattle 30 months or older.

In addition o our validated control point we also employ several control measures including Sanitation Standard Operating Procedures (SSOP) and Good Manufacturing Practices (GMP) to insure that we produce a safe and wholesome product.

-82°C water knife/equipment sanitizers are utilized.

-Positive airflow is utilized on the kill floor to prevent the circulation of airborne contaminants.

-Everyone in his/her point of work is taking care of any case of contamination and because of GMP he or her must clean any contaminated part of the carcass.

-There is an in-house inspector who visually examines each carcass for visible contamination (CCP1)

-Once in the cooler carcass spacing is maintained to ensure adequate air flow and expedite surface cooling.

Frigorifico PUL verifies the microbial interventions with generic E. coli testing according to USDA specifications. 5 cartons per lot are tested (N=60) according to Uruguayan program for testing E. coli O157:H7 at the end of the line of de boning.

We also perform daily random carcass swabs for the presence of Salmonella.
Frigorifico PUL has successfully completed the official sampling and testing program for Salmonella and E. coli O 157:H7 for carcasses and boneless beef cuts.

Non – O157 STEC:

From the 1st June 2012, Frigorifico PUL, Establishment Nº7, Uruguay, have taken the following actions to comply with the new Requirements from USDA/ FSIS regarding the Non O157 STEC: O26,O45,O103,O111,O121,O145:

Include in our HACCP PLAN the six relevant Non-O157 STEC serogroup as a hazard reasonably to occur, after reassessing regarding this hazard.

Apply the same preventive measures as to E.coli O157:H7, to reduce the risk of contamination with non O157 STECs.
Continue supporting the use of E. coli O157:H7 as an indicator organism for STEC, supporting that our Non-O157 STEC controls will be reliant on O157 STEC testing results.

Implement a Self Sampling program for the Non 0157 STECs, using the N=60 pieces sampling method according to MGAP new regulations from the 1st June 2012.

From 1 Jan 2015 the auto control samples for Non O157H7 analysis according to the new instructions from the MGAP, are taken from all productions that are to be subjected to grinding , as the samples for E coli O157:H7. This samples are from 5 cartons per lot are tested (N=60) according to Uruguayan program for testing E. coli O157:H7 at the end of the line of de boning.

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All the documents that supports this statement could be enclosed if it is necessary to do so.

References:

FSIS NOTICE 27th April 2012: FSIS Verification Testing NON-0157 Shiga Toxin Producing *Escherichia Coli* (NON-O157 STEC) in imported product under the MT51 Sampling Program.

MGAP Directive 3/2012, 2th April, 2012, Revisión de planes HACCP en referencia a la nuevareglamentación de USDA/FSIS sobre programas de control de Escherichia coli no-O157 productoras de toxina shiga (STEC).

Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing *Escherichia coli* (STEC) organism or Virulence Markers. May, 2012

Webinar MICA May 2012. Non-O157 STECs: Implementation Expectations DANIEL ENGELJOHN, PhD Assistant Administrator Office of Policy and Program Development Food Safety and Inspection Service U.S. Department of Agriculture.

AMI Foundation Letter, November 21, 2011: Escherichia coli O157:H7 as an indicator organism for other pathogenic shiga toxin-producing E.coli in a beef food safety management program.

AMI LETTER Re: Docket N° FSIS 2010-0023: final Determination and request for Comments; Shiga Toxin-Producing Escherichia coli in certain Raw Beef Products; 76 Fe. Reg 58157 (Sept. 20,2011) December 21, 2011.
Barkocy-Gallagher GA, Authur TM, Rivera-Betancourt M, Nou X, Shackelford SS, Wheeler TL, and Koohmaraie M. 2003. Seasonal prevalence of shiga toxin–producing Escherichia coli, including O157:H7 and non-O157 serotypes, and Salmonella in commercial beef processing plants. J. Food Prot. 66: 1978–1986.
Saini PK, Marks HK, Dreyfuss MS, Evans P, Cook Jr LV, and Dessai U. 2011. Indicator organisms in meat and poultry slaughter operations: their potential use in process control and the role of emerging technologies. J. Food Prot. 74: 1387-1394. It was enounced in a letter from the AMI that I am sending attached. **Note: This document supports the use of E. coli O157:H7 as an indicator organism for pSTEC*

PUL is committed to producing the highest quality and safest product possible, and is also certified ISO 9001:2000 since 2003 since 2006 we are certified for ISO 22000 and BRC by SGS. If you require further information please do not hesitate in contact us.

Yours sincerely,

Chem Eng. Alejandra Silveira
Quality Assurance Manager
Frigorifico PUL