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DURAZNO, January of 2017.

-STATEMENT OF COMPLIANCE-

1- Approvals and certifications

FRIGOYI BILACOR S.A., export establishment N° 26 is approved by the US Food Safety and Inspection Service (FSIS) and by the European Commission to produce for export chilled and frozen beef, to Europe and USA. We certify that we comply with all USDA-FSIS regulations and European Union requirements.

FRIGOYI is certified on GSFS – BRC issue 6-july 2011 Certification grade A. Scope: production of chilled and frozen bovine meat, packed in vacuum bag, IWP or block, bone in and boneless beef. Livestock reception, slaughter, maturation, quartering, deboning, packing, cooling, freezing, storage and loading.

FRIGOYI is certified on ISO 22000:2005, Food safety management standard from april 2013. Scope: production of chilled and frozen bovine meat, packed in vacuum bag, IWP or block, bone in and boneless beef. Livestock reception, slaughter, maturation, quartering, deboning, packing, cooling, freezing, storage and loading.

FRIGOYI is certified on ISO 9001:2008, quality management standard from april 2013. Scope: production of chilled and frozen bovine meat, packed in vacuum bag, IWP or block, bone in and boneless beef. Livestock reception, slaughter, maturation, quartering, deboning, packing, cooling, freezing, storage and loading.

Our HACCP plan complies with FSIS Pathogen Reduction (PR) requirements. The P.R. component mandated a program of bacteriological testing of bovine carcasses for the presence of *Generic Escherichia coli* and *Salmonella spp.* bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.

2- HACCP and pathogen reduction program

HACCP plan is audited by on-plant Official Veterinary Inspectors (M.G.A.P. - Ministry of Livestock, Agriculture and Fishery of Uruguay) and other external official sanitary authorities. The Official Veterinary Inspectors also audit all the production process on plant.

HACCP plan is audited by LSQA (IQnet) through ISO 22000 implemented on our plant. HACCP plan ensure that our products are safety for the consumers.

The plant has other microbiological control programs than the Generic E.Coli and Salmonella spp in carcasses. To verify the effectiveness of the HACCP Plan, these programs are microbiological control over carcasses and cuts, equipment and contact surfaces (environmental controls), testing for APC, Enterobacteriaes.

Since the testing program started in our plant (2009), *Salmonella spp.* has not been detected in any randomly selected carcass sample tested.

In relation to *E.coli O157:H7*, establishment 26 confirms that its HACCP PLAN has been written in accordance with Federal Register 9 CFR 417 Docket Number 00-022N (dated 7 October 2002 and titled "*E.coli O157:H7* Contamination of Beef Products") and FSIS Notice 65-07 (dated 12 October 2007 and titled "Notice of Reassessment for *E. coli O157:H7* Control and Completion of a Checklist for All Beef Operations").

In relation to the six *non- O157* STEC, establishment 26 confirms that its HACCP was reassess according the FSIS notices May 31, 2012 (Shiga toxin- producing Escherichia coli in certain Raw Beef Products) and FSIS notices 63-12 9/27/12.

Sanitation procedures and intervention methods used during slaughter and all process are made to prevent faecal/ingest contamination, cross contamination and to reduce microbial load. All this procedures are fully itemized and explained in our GMP, SSOP, and HACCP plan.

The reassessed HACCP Plan includes the following interventions and other measures:

- ✓ Washing of cattle prior to the slaughter;
- ✓ Use of 2 knives for hide removal procedures;
- ✓ Occlusion of the rectum as a part of the hide removal procedures, occlusion of the esophagus after the hide removal procedures;
- ✓ Carcasses are inspected as a part of the monitoring of the CCP1. The critical limit is ZERO visible contamination regarding faecal/ingest material and milk on carcasses.
- ✓ Carcasses where faecal/ingest or milk leakage is observed, are segregated from the line and all visible faecal/ingest or milk contamination is promptly removed to prevent microbial contamination. The carcasses are thoroughly reinspected prior to return them to the slaughter line. Corrective action are taken over the slaughter process in this case.
- ✓ Carcasses are sprayed by lactic acid fog as a additional contamination control measure.
- ✓ Carcasses are rapidly dry chilled. Chilling of meat complies with the time/temperature requirements described in the CCP2. The critical limit is maximum temperature is 6 °C on chilled carcasses in a maximum 40 hours cooling.

These procedures are verified by Quality Management Department.

The efficacy of those interventions is validated by microbiological of product for *E.coli O157:H7* at the rate of 2-3 samples/production shift of manufacturing beef and *E. coli* (STEC) (O26, O45, O103, O111, O121, O145) at the rate 1 sample weekly of manufacturing beef.

If a “positive” detection were made, procedures are in place to prevent and avoid shipment of product. Only product that is compliant with HACCP requirements and tested “negative” for *E.coli* O157:H7 and six STEC *non-O157* is allowed to be shipped.

Following the reassessment of Establishment 26’s HACCP PLAN and its continued effective operation, as detailed above, the HACCP Team concluded that *E.coli* O157:H7 and the six STEC *non-O157* is a hazard reasonably likely to occur in its products without the implementation of a HACCP Plan.

3- Prerequisites program

On May 25th, 2006 the World Organization for Animal Health (OIE) has declared Uruguay free from Bovine Spongiform Encephalopathy (BSE).

To fulfill the USDA BSE SRM Regulations, since 2009 the following procedures are developed and implemented for all the cattle in Frigorífico 26:

- ✓ Separation and handling of non-ambulatory animals. The non-ambulatory animals do not enter into the slaughter, they are sacrificed in a separated facility and the meat is digested and incinerated.
- ✓ The stunning is not carried out with captive bolt with air injected equipment.
- ✓ Extraction and elimination of skull, eyes, trigeminal ganglia and tonsils.
- ✓ Extraction and elimination of brain and rachidea bulb, avoiding the contact with edible products.
- ✓ Extraction and elimination of the spinal cord in the slaughter.
- ✓ Extraction and elimination of the vertebral column and dorsal root ganglia.
- ✓ Removal of at least 80 inches of the small intestine as measured from the junction of the ileum and the cecum.
- ✓ The meat products to be exported do not contain mechanically recovered meat.
- ✓ The equipment used to cut through SRMs is for exclusive use and the routine operational sanitation procedures are applied on them.
- ✓ All the procedures for removal, segregation, and disposition of SRMs, are carried out avoiding the contact with edible products. If there are contact between SRMs and edible products, the contaminated areas are considered as SRMs.

In relation to BSE and SRM, establishment 26 confirms that its HACCP PLAN has been written in accordance with Federal Register 9 CFR Parts 309, 310 - 318, dated 13 July 2007 and titled “Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle; Prohibition of the Use of Certain Stunning Devices Used To Immobilize Cattle During Slaughter” (FSIS Notice 56-07).



4- Microbiological test

The Quality Assurance Department samples and tests raw non-intact beef products according to official regulations (1 test per lot $n=60$ $c=0$) for E. coli O157:H7 and STECs.

The FRIGOYI's laboratory has a genetic detection equipment by PCR (Assurance GDS Gene) for detection E coli O157:H7 and STECs.

The laboratory complies to ISO 17025 and is audited by DILAVE – MGAP official organism.

Frigoyi BILACOR SA Establishment N° 26, is committed to implement and maintain, compliance with the HACCP, GMP, SSOP in order to improve the safety and quality of the product.

If you require further information, feel free to contact me.

Yours sincerely,

Chemical Ing. Mayra Valle
Quality Assurance Department
FRIGOYI BILACOR SA