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Kilcoy Pastoral Company Limited
Establishment 640
Letter of Guarantee

Establishment Registration

Australian export operations are conducted under the regulatory controls of the Department Of Agriculture and Water Resources (DAWR). DAWR 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

DAWR veterinary officers have in addition to disease / health control, a full time on plant role, monitoring & auditing company performance in the discharge of their obligations under DAWR Approved Programs.

Overseas Listing

Establishment 640 is eligible to export to numerous overseas countries including the USA and Canada and operates under a DAWR Approved Arrangement (AA) program to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

HACCP Plan

The Approved Arrangement program incorporates HACCP. The HACCP plan contains CCP's which directly address the hazard of Shiga toxin-producing Escherichia coli.

HACCP Reassessment

The HACCP plan has been reassessed in accordance with Federal Register Notice 9 CFR part 417 Docket Number 00-022 N dated 7 October 2002 – E. coli O157:H7 Contamination of beef products and DAWR 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 O26, O111, O45, O103, O121 and O145.

The HACCP reassessment has determined that while STECS may be a potential hazard on incoming cattle it has been concluded that due to the effective implementation of the HACCP plan and Sanitary Standard Operating Procedures the hazard has been effectively controlled resulting in it not being reasonably likely to occur on product and the current HACCP plan is adequate to address these hazards.

The HACCP Plan has determined E coli 0157:H7 in boneless trim is not likely to occur.

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

- DAWR ante mortem on all livestock pre-slaughter
- Identification and management of ill or injured livestock
- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export
- Cattle are assessed for cleanliness prior to slaughter
- Use of highly trained operators

- After stunning -sealing of weasand by application of a clip/plug to prevent spillage
- Sealing of the bung via bagging to control cross contamination
- Line speeds appropriate to providing adequate time for hygiene inspections and dressing of the carcase
- Sanitising hands and equipment between carcases for high risk activities
- Knife sterilisation between carcases
- All carcases are subjected to a final inspection and hygiene trim
- Zero tolerance is in place for faecal, ingesta and milk spillage
- Carcase hot water wash pre chilling
- Chilling and freezing regimes to control microbial growth
- Product hygiene is monitored daily following the DAWR meat hygiene assessment guidelines
- Documented Corrective and Preventative actions are in place and followed
- Microbial testing of contact surfaces and product

Verification *E coli* O157:H7

Sampling

To verify the ongoing effectiveness of these interventions Establishment 640 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 in accordance with Microbiological Manual for Sampling and Testing of Export Meat and Meat Product.

In the past 12 months Establishment 640 has collected samples for 1,439 tests with 0 positives for *E coli* O157:H7.

Hold and Release

All product is subject to a 'Test, Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and returned negative test results for *E coli* O157:H7 is released for shipment.

Laboratory

Samples are tested by an ISO17025 accredited laboratory to conduct testing of meat products for *E coli* O157:H7.

Testing

Screening tests for *E coli* O157:H7 are performed using Assurance GDS® MPX Top 7 STEC for *E coli* O157. Potential positive results are confirmed using MLG 5B.02, MLG 5.05.

BSE

Australian legislation prohibits the feeding of all Restricted Animal Materials to all ruminants, including cattle. All beef products destined for the USA are free from Specified Risk Materials (SRM). SRM is removed in accordance with Federal Register Notice 03-025IF by being fully compliant with the McDonald's BSE Firewalls. All non-ambulatory, disabled or downer cattle are excluded from the United States product line.

Yours Sincerely
On Behalf of Kilcoy Pastoral Company Limited



John Thomson
Quality Systems Co-ordinator