



EMBASSY OF AUSTRALIA
WASHINGTON DC

IN REPLY QUOTE:

10 February, 2003

TO WHOM IT MAY CONCERN

Australia's *E.coli* O157:H7 HACCP Reassessment

This is to confirm that Australia has complied with the USDA FSIS Notification to reassess HACCP programs at Australian US-listed beef producing plants.

Six Australian Large plants (over 500 workers) met the US deadline of compliance by 6 December 2002.

54 Small plants (between 10-500 workers) met the US deadline of 4 February 2003.

These 60 plants comprise all of the Australia US-listed beef slaughter and beef processing plants.

As a consequence, each Australian plant has determined that it's reassessed HACCP plan results in *E.coli* O157:H7 not being likely to occur in beef product produced at that plant. The reassessments were conducted at each plant by the particular company in collaboration with the Australian Quarantine and Inspection Service (AQIS).

AQIS has officially notified the USDA FSIS of the reassessment through the accompanying letters.

A handwritten signature in black ink, appearing to read 'P. Corrigan'.

PHILIP J. CORRIGAN
Veterinary Counsellor



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Department of
 AGRICULTURE
 FISHERIES &
 FORESTRY -
 AUSTRALIA



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Ms Karen Stuck
 Acting Deputy Assistant Administrator
 Office of International Affairs
 Food Safety and Inspection Service
 United States Department of Agriculture
 WASHINGTON D.C. 20250

Dear ^{Karen}~~Ms Stuck~~

Revised rule for *E. coli* O157:H7

Further to my letter of 11 December 2002, I can confirm that as at 4 February 2003 there were 54 Australian establishments that would be classified as "small plants" having between 10 and 500 employees. All of these establishments have reassessed their HACCP plans to determine whether *E. coli* O157:H7 is a hazard reasonably likely to occur. I can confirm that the establishments have either included one or more critical control points for *E. coli* O157:H7 in their HACCP plans or have determined that no additional control measures are necessary because existing measures effectively control *E. coli* O157:H7 such that it is not a hazard reasonably likely to occur in the meat products produced. AQIS has commenced, and will complete, its review of each plant's HACCP plan reassessment in accordance with the FSIS Notice 44-02 titled "Instructions for Verifying *E. coli* O157:H7 Reassessment".

Where establishments have included one or more critical control points for *E. coli* O157:H7 in their HACCP plans the critical control points have been validated by reference to the guidance documents provided by FSIS.

As part of the requirements in your letter dated 22 October 2002, Australia will provide to FSIS a detailed technical rationale as to why no further actions were taken to cover those establishments that have re-assessed their HACCP plans and determined that *E. coli* O157:H7 is not a hazard reasonably likely to occur. The areas to be covered in the detailed technical rationale include reviews of relevant literature, statistical analyses of microbiological testing data, relevant meat production practices in Australian plants and the legislative basis for these practices, comment on relevant aspects of the Australian cattle production system and public health issues concerning *E. coli* O157:H7 in Australia. The full rationale will be submitted prior to the forthcoming review of Australian plants in April for technical discussions with the inspectors prior to, and during, the inspections.

A Government regulated verification process will also be implemented for 'on plant' end-product testing for *E. coli* O157:H7. It is intended that the verification process will formalise testing that has been conducted by establishments for some time now to meet commercial requirements.

I trust that Australia has met your requirements in relation to the revised rule for *E. coli* O157:H7.

Yours sincerely


 Greg Read
 Executive Manager, Exports

5 February 2003



Ms. Karen Stuck
Acting Deputy Assistant Administrator
Office of International Affairs
Food Safety and Inspection Service
United States Department of Agriculture
Washington, D.C.
20250

Karen
Dear Ms Stuck,

Revised Rule *E. coli* O157:H7

Thank you for your letter dated 22 October 2002 advising changes that FSIS have made in regard to the control measures that need to be implemented in regard to *E. coli* O157:H7.

I can confirm that as at 6 December 2002 the 6 establishments which are classified as "Large", according to the criteria specified in your letter, have reassessed their HACCP plans and included one or more critical control points for *E. coli* O157:H7 in their HACCP plans. At present these critical control points are validated by reference to relevant literature while we analyse further advice from your Service on matters relating to in-plant/practice validation/verification of control measures for this pathogen received on 5 December 2002.

Australia has also separately provided detailed comments on the Federal Register Notice advising of this change in rule and I enclose a copy of these for your information.

Yours sincerely,



Greg Read
Executive Manager
Exports

11 December 2002