

January 15, 2016

HACCP STATEMENT OF COMPLIANCE 2016

Northern Co-operative Meat Company Ltd (NCMC) **Establishment 239**

1. 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 and Food Safety Meat Assessors have in addition to disease / health control, a fulltime on plant role, monitoring / auditing company performance in the discharge of their obligations under DAWR Approved Programs.

Overseas Listing

Establishment 239 is USA listed and operates under a DAWR Approved Arrangement program to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

2. 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 the following DAFF Meat Notice 2012/03 and Code of Federal Regulations - Notice 9 Chapter 3 Subchapter E Part 417

NCMC consider E. coli O157:H7 and specified Non O157 Shiga Toxin E. coli as a hazard reasonably likely to occur on incoming cattle. NCMC's HACCP plan identifies and implements 7 CCP's that are effective in reducing microbiological contamination of the nominated STEC's to a risk category where the hazard is not reasonably 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 for slaughter
- > 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

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People, Service, Community

- Zero tolerance is in place for faecal, ingesta and milk spillage
- 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

3. Verification E coli 0157:H7

Sampling

To verify the ongoing effectiveness of these interventions Establishment 239 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 in accordance with *Meat Notice 2012/03 Escherichia coli O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N=60 Method).*

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 are released for shipment.

Laboratory

Samples are tested by an ISO17025 accredited laboratory (NATA accreditation number 19170) to conduct testing of meat products for *E coli* O157:H7

Testing

Screening tests for *E coli* O157:H7 are performed using AOAC 031002 BAX Real Time for *E coli* O157. Potential positive results are confirmed by an approved external laboratory using MLB 5B.02.

4. 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,

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