



Midfield Meat International Pty. Ltd.
Midfield Meat Processing Pty. Ltd.
Midfield Meat Transport Pty. Ltd.
Midfield Co-products Pty. Ltd.
Midfield Pastoral Pty. Ltd.

MIDFIELD MEAT INTERNATIONAL P/L

ABN 78 065 864 904

P.O. Box 412 Warrnambool, Victoria 3280
Corner Scott Street & McMeekin Road, Warrnambool, Victoria 3280
Telephone (03) 5562 1644 Facsimile (03) 5561 5519
email: midfield@midfield.com.au

03 January 2012

Letter of Guarantee

Without Prejudice

To whom it may concern.

Midfield Meat International Pty Ltd, Est. 180 confirms that its HACCP plan has been reassessed in accordance with Federal Register Notice 9 CFR Part 417 Docket Number 00-0022N dated 7 October 2002.

FSIS Notice 05-09 (1/7/09) "*Measures to address E.coli 0157:H7 at establishments that receive, grind, or otherwise process raw beef products*" and FSIS Directive 10,010.1 (Revision 3) 3/31/10 are also considered in the construction of this document particularly where both documents observe the relationship between a "supplier" and a "receiver".

This reassessment has determined that *E.coli* 0157:H7 is **reasonably likely to occur** on meat products **without** the effective implementation of the Company HACCP plan.

The reassessment of the HACCP plan has recently been audited and approved (December, 2011) by Veterinary Officers of the Australian Quarantine and Inspection Service. (AQIS).

The reassessed HACCP plan includes the following interventions which are designed to reduce, eliminate or control *E.coli* 0157:H7. The efficacies of these interventions are verified by the microbiological testing for the presence of *E.coli* 0157:H7 on boneless meat products to wit:-

- The extensive use of AQIS approved Standard Operating Procedures (SOP) and specific-to-task work instructions to ensure reliability and consistency of operator performance.
- Extensive training of all operators using the nationally accredited MINTRAC training process, including a focus on the key elements namely, personal hygiene and sanitation and quality assurance.
- Microbiological control programs for personal hygiene, equipment and contact surfaces.
- Ante Mortem inspection of animals by AQIS Officers.
- Provision of suspect pens to isolate and maintain separation of suspect animals.
- Intensive and detailed washing of all bovine animals prior to slaughter.
- The occlusion of the oesophagus by using an oesophageal plug and a secondary "Adept" oesophageal clip prior to the hoisting of the carcass to the main rail on adult cattle. Application of "Adept" oesophageal clip within veal processing.
- The use of sterilised knives in the hide flaying process.
- Effectively sealing of the bung of the carcass by encapsulating in a plastic bag and sealing with an elastrator ring to eliminate bung leak on adult cattle.
- The use of a ball tipped brisket saw blade to prevent paunch break during the brisket sawing process on adult cattle.
- Other interventions on Veal include evacuation of the bung contents prior to hide removal with a bung vacuum, a steam vacuum of the fore quartering cutting lines, a shoulder and hide puller that peels the hide outwards and away from the carcass, and a thoracic wash.
- The effective trimming of any inadvertent contamination on carcasses on the slaughter floor to achieve a zero tolerance of fecal, ingesta or milk contamination of carcasses and verified by the deployment of a **CCP 1** (Zero tolerance of faeces, milk and ingesta) to achieve this outcome.
- The additional application of the validated refrigeration step **CCP 2** to ensure the effective refrigeration of product in accordance with *Australian Standard for the Hygienic Production of Meat and Meat Products for Human Consumption. AS 4696:2007*
- Exhaustive pre-shipment review procedures are conducted to ensure that only product compliant with HACCP requirements and **tested negative for E.coli 0157:H7** are shipped from the Establishment.



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Est. 180 operates an *E.coli* 0157:H7-testing program prior to loading for export. The testing program is conducted in accordance with the instruction within AMN 2010/03 and is designed to test at **N=60**, a randomly sampled "LOT" of cartons, not to exceed 700, of product destined for grinding in the US (or territories), generating a sample of 375g per production period.

The results of the testing regime is notified in accordance with the provisions of **FSIS Directive 10,010.1 (Revision 3) 3/31/10**, where a **Certificate of Analysis** (COA) is provided for each Container of product shipped.

Only product that is compliant with the HACCP requirements and tested negative for *E.coli* 0157:H7 is shipped to the United States of America or territories thereof.

It is therefore considered that due to the reassessment of the HACCP plan in operation at Est. 180 and of the continued effective operation of the said plan detailed in the information provided herein, Midfield Meat International Pty Ltd Est. 180 has concluded that *E.coli* 0157:H7 is a hazard **not reasonably likely to occur** in its meat products.

Midfield Meat International Pty Ltd has in place Standard Operating Procedures to ensure the removal from all carcasses of SRM's (Specified Risk Material) prior to leaving the processing floor and the effective containment and disposal of the said SRM's. These programs are monitored daily for effective compliance and are robustly 3rd party audited for several North American Brands.

In addition to the foregoing, **Midfield Meat International Pty Ltd** is committed to the principles and practices of the company Animal Welfare program that includes, within a number of references, compliance of the "Recommended Animal Handling Guidelines and Audit Guide 2007" published by the American Meat Institute Foundation.

Midfield Meat International Pty Ltd is committed to producing product of the highest safety and quality.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Noel M. Kelson", followed by a horizontal line and a checkmark.

Noel M Kelson
Quality Manager
Midfield Meat International. Pty. Ltd.

This document is produced as commercial-in-confidence by MIDFIELD MEAT INTERNATIONAL PTY LTD as a requirement to comply with FSIS Directive 05-09 and Directive 10,010.1 Revision 3 (3/31/10).

Accordingly this letter of guarantee can only apply to the uniquely identified "LOT" of cartoned product bearing a discreet shipping mark number that are maintained in that grouping and consigned in total to a registered facility for grinding.

It is intended to be provided exclusively to establishments defined as "receiving" MIDFIELD MEAT INTERNATIONAL PTY LTD non-intact beef product intended for grinding where the "receiving" establishment has a "direct relationship" a "more casual relationship" or an "indirect relationship" with MIDFIELD MEAT INTERNATIONAL PTY LTD.

Dissemination of this commercial-in-confidence document by any other means than directly from MIDFIELD MEAT INTERNATIONAL PTY LTD or under authorization by MIDFIELD MEAT INTERNATIONAL PTY LTD and includes publishing or broadcasting electronically will represent a breach of the said commercial-in-confidence status and will be prosecutable within the jurisdiction within which the breach is alleged.