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HACCP LETTER OF ASSURANCE

HACCP Plan Re-Assessment 2010

G & K O'Connor Pty Ltd, Est. 1265 undertakes re-assessments of the HACCP system on a continuing basis in accordance with the terms of the Approved Arrangement held with the Australian Quarantine and Inspection Service (AQIS). This includes an annual re-assessment in compliance with the requirements set down by FSIS within US Federal Register Notice 9 CFR Part 417 Docket Number 00-022N dated 7 October 2002 and by AQIS Meat Notice 2002/13

HACCP re-assessments have confirmed that *E coli O157 H7* is a significant microbiological pathogen known to occur within the Australian cattle herd. Accordingly, *E coli O157:H7* is determined a food safety hazard reasonably likely to occur and, accordingly, is subject to the control measures implemented through the HACCP system to prevent, eliminate or reduce its occurrence to below detectable levels in boneless manufacturing meat produced by this establishment.

The effectiveness of critical control points and other control measures within the HACCP system are addressed within the HACCP reassessment to assure:

- the prevention of primary and secondary contamination on carcasses through best practice procedures in the presentation of cattle for slaughter and in the dressing of beef carcasses;
- the inspection of all carcasses to detect and remove any zero tolerance defect on carcasses prior to leaving the slaughter floor;
- the elimination of potential pathogen growth on carcasses through validated refrigeration practices.

The control measures implemented within the HACCP system at Est 1265 include:

- assessment of cattle for cleanliness of cattle prior to slaughter and intervention procedures where required;
- occlusion of the oesophagus prior to hoisting carcasses after slaughter;
- a dual knife sanitising system for all de-hiding and bunning tasks;
- tying and bagging the bung of each carcass;
- line speed appropriate to providing sufficient time for operators to tasks in the hygienic dressing of carcasses and to complete hygiene inspections;

These control measures are supported by a comprehensive suite of good manufacturing programs approved and audited by AQIS;

- written work instructions for slaughter, boning and other tasks involved with the handling of meat and packaging;
- validated temperature controls in cold rooms;
- continuous data logging program tracking the temperature history of meat;
- written animal welfare procedures for the handling and slaughter of cattle;
- standard operating procedures relating to hygiene, sanitation, structure and maintenance, pest control and calibration;
- structured training program for all employees delivered through nationally accredited training organisation

Microbiological data are evaluated as part of the HACCP re-assessment process in order to verify the efficacy of the HACCP system in the control of *E. coli 0157:H7* and other pathogens:

- daily results for generic *E. coli* and *Salmonella* from the testing of carcasses under the AQIS regulated ESAM program;
- daily results for *E. coli 0157:H7* under the AQIS regulated *E. coli 0157:H7* testing program for boneless manufacturing beef;
- monthly results from independently drawn cutting room samples of boneless beef;
- results from microbiological testing by trading partners

The HACCP plan, together with reassessments and on-going operation, are subject to approval, continuous monitoring and regular audit by AQIS

E. coli 0157:H7 Sampling and Testing Program

Est 1265 tests boneless manufacturing beef in accordance with the N60 sampling plan prescribed in AQIS Meat Notice 2008/05 "*Escherichia coli 0157:H7* testing of raw ground beef components destined for export to the US and US Territories". The testing protocol prescribed within AQIS Meat Notice 2008/05 is agreed with FSIS; is reflected within the written "test and hold" program at Est. 1265 for *E. coli 0157:H7* approved by AQIS; and is subject to continuous monitoring and regular audit by AQIS

Under this protocol, five (5) separate meat pieces are drawn from each of 12 randomly selected cartons (sample minimum 375 grams in weight) from each lot of 700 cartons produced daily. The samples are tested at an independent off-site laboratory approved both by AQIS and the National Association of Testing Authorities (NATA) by an analytical method approved by AQIS (FSIS MLG 5A 01 – 15-22 hour PCR screening test using DuPont BAX MP).

In round figures, 750 tests are performed annually at Est 1265 under this protocol. There have been no confirmed detections for *E. coli* 0157:H7 in boneless manufacturing beef produced at Est 1265 from commencement of this testing protocol in January 2008.

All boneless beef destined for grinding is held under management control until laboratory clearance has been obtained. In the event of a presumptive result for *E. coli* 0157:H7, the affected lot is retained under management and AQIS retention until such time as a confirmatory result is received. If confirmed positive, the product is withdrawn from commerce and is subject to heat treatment in Australia.

Prior to CY2008, 1200 composite samples had been tested yearly for *E. coli* 0157:H7 from 6000 separate samples of boneless beef through commercial testing arrangements. The results from this earlier protocol show that there had been no positive detections made for *E. coli* 0157:H7 in boneless manufacturing beef produced by Est 1265 at any time during the ten year life of this protocol.

Conclusion

In light of outcomes from the HACCP re-assessment process and from an analysis of microbiological testing data, G & K O'Connor Est 1265 has concluded that *E. coli* 0157:H7 is below detectable levels in boneless manufacturing beef produced at the establishment.

Yours sincerely



Richard Ford
Technical and Regulatory Affairs

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