

Wingham Beef Exports
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February 17, 2009

To whom it may concern

Wingham Abattoir Establishment 154 *E.coli* O157:H7 STATEMENT OF COMPLIANCE
This statement should be read in conjunction with the Australian Quarantine Service (AQIS) Meat Notice 2007/17 (dated December 10, 2007) *Escherichia coli* O157:H7 testing of raw ground beef components destined for grinding in the USA.

In response to your request concerning food safety, Wingham Abattoir Establishment 154 confirms it has process controls, including its HACCP that are designed to control microbiological hazards (for example O157:H7).

Establishment 154, Wingham Abattoir confirms that its HACCP Plan has been reassessed in line with 9 CFR Part 417 *E.coli* O157:H7 Contamination of beef products, and FSIS Directive 10.010.1 and in accordance with Federal Register Notice 9 CFR Part 417 Docket Number 00-0022N Dated 7 October 2002. This reassessment has determined that *E.coli* O157:H7 is a hazard that is reasonably likely to occur without the implementation of the HACCP plan.

The reassessment of Establishment 154 Wingham Abattoir's HACCP plan in accordance with AQIS Meat Notice 2002/13 has been audited and verified by the Australian Quarantine Service (AQIS).

The reassessed HACCP plan found that due to the continuous and effective operation of the Sanitary Standard Operating Procedures, Work instructions, Meat Hygiene Assessment, *Escherichia*, *Salmonella* and Total Viable Count Monitoring (ESAM), current CCP's, Corrective action SOP and Pre-shipment review and the process controls in place at Establishment 154.

The reassessed HACCP plan includes the following interventions:

- Ante mortem inspection by AQIS personnel
- Detailed livestock washing prior to slaughter
- Occlusion of the oesophagus with a plastic plug prior to hoisting and sealing the oesophagus with a weasand clip
- Dual knife system to ensure effective sterilisation after each cut through the hide
- Extensive use of polythene protection of the hind legs to prevent cross contamination prior to hide removal
- Sealing of the bung with a plastic bag and elastrator ring
- Use of a ball point blade on the brisket saw
- Trimming of any contamination
- Meat Hygiene Assessment of dressed carcass with zero tolerance procedures and monitoring program against written work instructions
- All operators are trained in their written work instructions on a regular basis. All new employees are trained off the job in personal hygiene and sanitation and assessed on the job as part of an industry traineeship

this reduces, eliminate or control *E.coli* O157:H7. The efficacy of these interventions are verified by microbiological testing for *E.coli* O157:H7.

As well as the above interventions the following procedures are applied:

- Established Standard Operating Procedures and Work Instructions for control of sanitation and hygiene.
- Microbiological control programs for personal hygiene, equipment and contact surfaces and pre-shipment review procedures.

***E.coli* 0157:H7 Sampling Protocol**

Wingham Abattoir Pty Limited samples and test in accordance with Australian Quarantine Inspection Service (AQIS) Meat Notice 2007/17 "*Escherichia coli* O157:H7 testing of raw ground beef components destined for grinding in the USA".

The on site laboratory has AQIS approval and the procedure is documented in the Laboratory General Procedures Manual (Section 8: *E.coli* O157:H7 Test) and the procedure is overseen by the on plant AQIS OPV on a regular basis.

The company uses AQIS approved test method being Bio Control – VIP for EHEC – AOAC Official Method 996.09.

Product is placed under isolation until test results are received. Results are recorded as negative or presumptive positive.

Presumptive positive samples are forward to Symbio Alliance an AQIS approved laboratory for conformation by Oxoid BAX (AOAC R1 010401 immunomagnetic separation) culture method, and Polymerase chain reaction methods using the BAX system.

Over the last 12 months from February 1, 2008 to February 1, 2009 of continuous operation, 2448 cartons have been sampled to conduct 204 tests with a detection rate of less than 0.5% of *E.coli* O157:H7.

No tested product is released for sale unless the test results show that *E.coli* O157:H7 has been reduced to below detectable levels.

SRMs and Non-Ambulatory

Establishment 154 ensures controls are in place to prevent meat and meat products which contain Specified Risk Material, carcasses of BSE subclinical cases entering export markets in accordance with Quarantine Inspection Service Meat Notice (AQIS MN) 2004/04 "Cattle Affected By 'Staggers' Conditions", AQIS MN 2004/09 "Notification Of Sampling for BSE-Exclusion Testing", AQIS MN 2007/18 "Amended National Transmissible Spongiform Encephalopathy Surveillance Program – Cattle and Sheep" and Overseas Country Requirement "Interim Final Rules Regarding US BSE Control Measures"

- Any animals tested for BSE are excluded from our raw material until animal is cleared.
- Australian standards prohibit the feed of meat and bone meal products to any ruminant animals.
- All "downer" cattle are excluded from our export raw material.
- Air injected stunning is not used in our slaughter process.
- No specified risk material (SRM) is allowed in our raw material.

Prerequisites

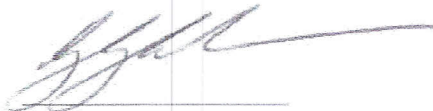
Establishment 154 has mandatory documented procedure for

- Pest control,
- Employee Training,
- Personal Hygiene,
- Product Integrity / Security,
- Product traceability and recall.
- Animal Welfare - Animals are handled and slaughtered in accordance with Australian welfare standards, which include ante and post mortem inspection

Due to the reassessment of Est. 154 Wingham Abattoir's HACCP plan and of its continued effective operation, detailed in the information provided here, Establishment 154 Wingham Abattoir has concluded that,

E.coli 0157:H7 is a hazard reasonably unlikely to occur in its products.

Establishment 154 Wingham Abattoir is committed to producing product of the highest safety and quality.



G. Coleman
General Manager