



Thursday, 24 April 2003

To Whom It May Concern

Establishment 1620 confirms that its HACCP plan has been re-assessed in accordance with the US Federal Register Notice 9 CFR Part 417, Docket Number 00-022N dated 7 October 2002. This re-assessment has determined that E.coli O157-H7 is a hazard reasonably likely to occur without the implementation of the company's HACCP plan.

Directly following the reassessment, the Australian Quarantine and Inspection Service (AQIS) audited and approved the HACCP plan for Establishment 1620, and this plan has since been verified by an AQIS Systems Audit dated 26/02/03. Monthly audits by the AQIS Area Technical Manager ensure constant surveillance of the system.

Establishment 1620 slaughters, chills, bones, and packs beef for freezing as cartoned product for the US. Est 1620 has a comprehensive food safety system comprising HACCP plans, which include zero tolerance management and Standard Operating Procedures that ensure good manufacturing practice.

#### PREVENTION

Process steps and procedures are identified within the HACCP plan intended to prevent contamination of carcasses from E.coli O157-H7 and other pathogens during the slaughter and boning. These steps and procedures include:

- Assessment of cattle prior to slaughter, to determine the level of washing required to remove visible contamination, and ensuring that the cattle are washed to the level determined in the assessment
- Oesophageal inclusion during the sticking operation and prior to the hoisting of the carcass
- Weasand clip applied to prevent leakage
- Use of best practice techniques throughout the dressing process such as using the two knife sterilisation technique where knives are changed following any hide opening cuts; placing the bung inside a plastic bag and sealing it with an elastrator rubber ring; dehiding and evisceration; and throughout the chilling and boning processes.
- Standard Operating Procedures (SOP's) for:
  - Personal health and hygiene
  - Sanitation
  - Maintenance
  - Training
  - Written work instructions for all operational tasks

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## CRITICAL CONTROL POINTS

The reassessed HACCP plan at establishment 1620 identifies critical control points during the slaughter process:

- The trim rails on the slaughter floor (AQIS mandated CCP 1 & 2) to remove contamination by visible faecal material on the surface of beef carcasses by knife trimming.
- CCP 3 Chilling of hot carcass and CCP 4 Freezing of boneless and bone-in carton meat
- Est 1620 verifies the freezing process of its product through constant monitoring by data loggers, and through the auditing of freezer records.
- These records reveal that product produced by Establishment 1620 is rapidly cooled to 7°C or below to inhibit growth of E.coli O157: H7 and further reduced to < -10°C within 48 hrs of boning. This is to achieve log CFU reductions quantified in the scientific literature for E.coli O157: H7 from inactivation during the freezing process.

## VALIDATION

Results from the testing of samples for E.coli O157: H7 for the past four years reveal that Establishment 1620 has carried out 4020 tests and there has been no detection of E.coli O157: H7. These samples have been collected and sampled according to our Standard Operating Procedure, throughout the production cycle and across all seasons during the past four years.

## VERIFICATION

In addition to generic E.coli and salmonella testing, daily microbiological testing for E.coli O157:H7 is used as verification of the HACCP plan at establishment 1620, in accordance with the following protocol.

### Sample Selection

A minimum of three (3) cartons per run (approx 2hrs) per chain are tested each day. This is 30 cartons per day.

### Sample Collection

Samples are collected by trained Quality Assurance staff prior to carton closure.

Using a sterile stomacher bag and sterile knife, remove approximately 100 grams of trimmings from each trim line (60,75, 85c) and place these into a stomacher bag. A minimum of 300 grams for each time zone must be collected. Two composite samples are collected and placed into separate sterile stomacher bags. These samples are sent to a National Analytical Testing Authority (NATA) Accredited Laboratory for analysis

### Testing

A NATA accredited laboratory carries out testing.

Test method used is the VIP method; The US Association of Official Analytical Chemists (AOAC) approves this method. All testing is performed no longer than the following day after collection. No detections of E.coli O157:H7 have been recorded under this verification-testing program since testing commenced at Est 1620 in October 1998.

In light of the reassessment of the HACCP plan at establishment 1620, and the continuing effective operation of the Total Management System, Establishment 1620 has concluded that E.coli O157:H7 has been reduced to below detectable levels.

Australian Country Choice (ACC) is committed to producing the highest quality safe food. ACC warrants to its customers, that only product that is compliant with the Company's HACCP and testing regime for E.coli O157:H7 (as outlined previously in this document) is shipped.

Signed



David Foote  
Chief Executive Officer - ACC Group

Date: 7/5/03