

**AUSTRALIA MEAT HOLDINGS PTY LIMITED**  
Incorporated in Queensland

A.B.N. 14 011 062 338



Head Office:

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**LETTER OF GUARANTEE**  
**AMH Establishment 235 Assessment of HACCP Plans**

**Introduction:** AMH Establishment 235 is the largest beef slaughter establishment in Australia and is responsible for in excess of 50% of AMH's total production. Est 235 processes a greater diversity of cattle types than other AMH establishments.

In year 2002 Establishment 235 conducted a reassessment of its HACCP plan in accordance with 9 CFR Part 417 [Docket no.00.022] E.coli 0157:H7 Contamination of Beef

The reassessment determined that E.coli 0157:H7 is a hazard reasonably likely to occur. Testing history prior to year 2002 was the basis for this decision. (See below test results and validation).

This conclusion resulted in a change to the HACCP plan. A new CCP was introduced for the specific purpose of controlling the E.coli 0157:H7 hazard so that it is reasonably unlikely to occur in product after treatment.

The hot water carcass decontamination wash on the slaughter floor was designated a CCP and identified in the HACCP plan as CCP1a, increasing the number of CCP's from (4) to (5). The others being, CCP1 Carcass hygiene trimming (slaughter), CCP 2 Chilling hot carcass sides, CCP3 Chilling cartoned Boneless and Bone in Beef, CCP 4 Freezing Boneless and Bone in Beef.

Establishment 235 has had an E.coli 0157:H7 testing protocol in place since June 1998. During this time which is up to and inclusive of December 2003, a total of 18,470 tests have been conducted at a confirmed positive rate of 0.037%.

**Validation of the Hot Water Wash Intervention**

History of the intervention. Installed late 1999, operational since year 2000. Initially was not mechanically reliable necessitating a prolonged workup period which continued up to the year 2002. However, since it became fully functional, there is sufficient data available to support the intervention as being a CCP. For the years 2002 and 2003 there have been 7,960 tests conducted for zero detections.

In addition to these results, in year 2003, Food Science Australia was contracted as an independent expert scientific authority to conduct in process validation trials. Validation of the hot water intervention step as a CCP was successfully completed.

**End Product Testing For E.coli 0157:H7**

Testing is conducted at twice the rate specified in the AMC testing protocol. Product is sampled following boning but before freezing, all manufacturing grinding packs are tested. Product is sampled over the course of the entire production period. The day's production testing negative, is cleared for storage as a "lot" from which single shipments are drawn. No product is released for shipment until test results are known, avoiding any possibility of a recall.

If one manufacturing grinding pack tests positive then, all other products from that production line are also rejected, even though they have tested negative, no distinctions are made. Confirmed positive product is not exported, it is consigned to heat sterilisation in Australia under the control of the Australian Quarantine and Inspection Service.

The screening tests are performed on site in the plants own laboratory, using a screening test meeting the USDA's specifications for such tests. The laboratory has NATA certification for certain tests so, laboratory technicians are professionally competent in conducting these tests.

Confirmatory testing of presumptive positives is conducted off site by an independent NATA accredited laboratory.

Only product that is compliant with the HACCP requirements and tested negative for E.coli 0157:H7 are shipped.



Ray Lucas

Group Food Safety and Quality Assurance Manager