

AUSTRALIA MEAT HOLDINGS PTY LIMITED

Incorporated in Queensland

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Head Office:

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LETTER OF GUARANTEE AMH Establishment 004 Reassessment of HACCP Plans

In the year 2002 AMH Establishment 004 conducted a reassessment of its HACCP plans in accordance with 9CFR Part 417 [Docket no.00-022] E.coli 0157:H7 Contamination of Beef Products.

The outcome of the reassessment determined that E.coli 0157:H7 is a hazard reasonably unlikely to occur, this remains the current position. The basis for this decision is the results of carcass and end product testing for E.coli 0157:H7.

Testing has been performed since June 1998. During this time up to and including December 2003, a total of 5,344 tests have been conducted with a positive detection rate of 0.018%.

On this evidence, the existing critical control points (CCP's) are considered adequate to control the hazard. The CCP's are:

- CCP1. Carcass hygiene trimming (slaughter)
- CCP2. Chilling hot carcass sides
- CCP3. Chilling cartoned Boneless and Bone in Beef
- CCP4. Freezing cartoned Boneless and Bone in Beef

The foundation for this performance is laid by the stringent controls exerted over the slaughter process. These controls include process and carcass monitoring in addition to CCP monitoring.

Process monitoring of operator performance for compliance with hygiene procedures is assessed for 100% compliance, no tolerance applies, any breach of requirements results in supervisor intervention, these are all documented.

Three vital hygiene aspects in controlling the slaughter process are:

- (i) Presenting livestock in a clean state for slaughter.
- (ii) Two knife sterilisation. During hide removal and evisceration, knives are changed between bodies and following any opening cuts including accidental ones.
- (iii) Butchers wash hands using warm water and soap between bodies.

Butchering performance is scored by the assessment of carcass hygiene prior to any hygiene trimming being performed. This inspection is not a regulatory requirement but it is the best measure of each operator's performance/job outcome, adverse trends are detected and corrected early. The intent is to focus on getting the job right in the first instance which lessens the risk of contamination and also confirms the operator's performance observed at process monitoring is maintained.

As a final step in the slaughter process to ensure the required standard of carcase hygiene is achieved,all carcase sides are subject to inspection and hygiene trim prior to exiting the slaughter floor.

Effective chilling, combined with strict product hygiene handling requirements and personal hygiene practices by employees, maintain and improve on the standards achieved on the slaughter floor.(Some die off of bacteria occurs during carcase chilling).

Inaddition to the mandatory testing of carcasses for generic E.coli and Salmonella,AMH does extensive microbiological testing as a process control, for slaughter operations,carcase chilling and boning.

End product testing for E.coli 0157:H7

Testing is conducted at twice the rate specified in the AMC protocol.Product is sampled following boning but before freezing,all manufacturing grinding packs are tested.Product is tested over the course of the entire production period.The days 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 product 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 treatment in Australia under the control of the Australian Quarantine and Inspection service.

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



Ray Lucas

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