



## NORTHERN CO-OPERATIVE MEAT COMPANY LTD

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Export Establishment  
Number 239

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To Whom It May Concern

### **STATEMENT OF COMPLIANCE**

- 1 The Northern Co-operative Meat Company Ltd (Establishment 239) is approved by the US Food Safety and Inspection Service (FSIS) to produce for export of bovine and bubaline meat, and bovine offal.
- 2 In the Federal Register, Vol. 61, No. 144, 25 July 1996 FSIS released the PR/HACCP Rule (also referred to as the MegaRegs). The Pathogen Reduction (PR) component mandated a program of bacteriological testing of bovine carcasses for the presence of *Escherichia coli* and *Salmonella* spp bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.
- 3 The Company has in place a fully documented HACCP-based quality assurance system called **Meat Safety Quality Assurance** (MSQA) which has been established by the Australian Government's Australian Quarantine & Inspection Service (AQIS) and has been assessed and approved by AQIS. The MSQA program:
  - complies with AQIS guidelines for meeting FSIS Pathogen Reduction/HACCP requirements; and
  - is audited by on-plant AQIS supervisors;
  - audited at least each month by external AQIS officers; and
  - has been subjected to a detailed verification audit by external AQIS auditors and found to meet AQIS and FSIS requirements; and
  - was most recently audited by FSIS officers in 2001 and 2002 and accepted as satisfactory.
- 4 In the last two years, *Salmonella* has not been detected in any randomly selected carcass sample tested.
- 5 The Company also:
  - complies with AS4696:2002 titled *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption*; and
  - is licenced by **Safe Food Production NSW** for the slaughter of cattle for the production of meat for the Australian market.
- 6 In relation to *E. coli* 0157:H7, establishment 239 confirms that its HACCP Plan has been reassessed in accordance with 'Federal Register Notice 9 CFR Part 417 Docket Number

00-022N dated 7 October 2002 and titled *E. coli* 0157:H7 Contamination of Beef Products.' The HACCP Team concluded, and the Senior Management Team agrees, that *E. coli* 0157:H7 is a hazard reasonably likely to occur in its products without the implementation of a HACCP Plan. The Australian Quarantine and Inspection Service (AQIS) has recently audited and approved the establishment's HACCP Plan.

- 7 The reassessed HACCP Plan includes the following interventions and other measures:
- washing or rejection of cattle with heavy hide faecal contamination (verified by inspection of hide-on carcasses by Quality Assurance Assessors);
  - occlusion of the oesophagus after stunning and/or bleeding (verified by observation by Quality Assurance Assessors of nominated Operatives carrying out their work procedures);
  - use of 2 knives for hide removal procedures (verified by observation by Quality Assurance Assessors of hide removal Operatives carrying out their work procedures);
  - identification, using tags, of carcasses where faecal/ingesta leakage is suspected or occurs during dressing procedures which prepare for removal of the gastrointestinal tract (verified by observation by Quality Assurance Assessors of nominated Operatives carrying out their work procedures);
  - tagged carcasses subjected to intensified inspection and, where necessary, intensified trim and operational sanitation procedures prior to chilling (verified by observation by Quality Assurance Assessors of the nominated Trimmer carrying out his/her work procedures),
  - carcasses are rapidly dry chilled. Cooling (chilling or freezing) of offal and boned meat exceeds the time/temperature requirements of the Australian Government's *Export Meat Orders*.

to reduce, eliminate or control *E. coli* O157:H7.

- 8 The efficacy of those interventions are verified by microbiological testing of boned product for *E. coli* O157:H7 at the rate of 1 carton in 140 cartons of manufacturing beef nominated by the Customer for export to the USA. That is the testing rate agreed by the Australian Meat Council and Burger King Corporation.

In the last 2 years, 5,365 samples from cartons of manufacturing meat have been tested for *E. coli* O157:H7 and none has returned a "positive" detection of *E. coli* O157:H7. If a "positive" detection were made, procedures are in place to prevent shipment of product. Only product that is compliant with HACCP requirements and tested "negative" for *E. coli* O157:H7 is shipped.

- 9 Following the reassessment of Establishment 239's HACCP Plan and its continued effective operation, as detailed above, Establishment 239 has concluded that the prevalence of *E. coli* O157:H7 has been reduced to undetectable levels. The Northern Co-operative Meat Company Ltd's testing program conducted for the lot from which this consignment was taken was found to be negative.

The Northern Co-operative Meat Company Ltd is committed to producing the highest quality and safest product possible. If you require further information please feel free to contact me.

Yours sincerely



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Quality Systems Development Manager