

WALTELL PTY LTD
ESTABLISHMENT 5642
& TRADING AS



STATEMENT OF COMPLIANCE

Friday, May 30, 2003

To whom it may concern,

Waltell Pty Ltd, Establishment 5642 is approved by the USDA Food Safety Inspection Service to produce and export beef (Bovine) meat and meat products to the USA.

The company has in place a fully documented HACCP-based quality assurance system called Meat Safety Quality Assurance (MSQA).

THE MSQA SYSTEM AT ESTABLISHMENT 5642:

- Complies with FSIS guidelines for meeting FSIS Pathogen Reduction/HACCP re-assessment.
- Is audited daily by on-plant Australian Quarantine Inspection Service (AQIS) Inspectors.
- Is audited monthly by an AQIS Area Technical Manager (ATM)
- Has been subjected to and passed a detailed Verification/systems audit conducted by the external AQIS Verification Unit.
- Has most recently been audited by FSIS Officer in 2003 and accepted as satisfactory

Establishment 5642 confirms it has re-assessed its HACCP plan in accordance with the requirements of US Federal Register Notice 9 CFR Part 417 Docket number 00-022N dated 7th October 2002. This reassessment has determined that *E. coli 0157:H7* is a hazard that is reasonably likely to occur without the implementation of the establishments HACCP Plan.

The reassessment of the Establishment 5642's HACCP Plan has been audited and approved by the Australian Quarantine and Inspection Service.

Implemented Interventions/Procedures

The HACCP plan at Establishment 5642 includes the following interventions to reduce, eliminate, or control *E. coli 0157:H7* to an un-detectable level.

- Processing/Fabrication Room temperature maintained at, or below 10°C
- Effective implementation, monitoring and recording of Sanitation & Hygiene Standard operating procedures ensuring that all plant work areas and equipment used for processing & fabrication is cleaned prior to use, and cleaned during production.
- Effective Implementation, monitoring, and recording of Personal Hygiene Standard Operating Procedures.
- Adequate facilities, design and construction of the plant minimize, and prevent cross contamination from airflows.
- Critical control points are in place, monitoring and controlling the temperature of product at arrival, during chilling, freezing and storage.
- Letters of assurance from supplying/slaughtering establishments stating that their HACCP plans have been re-assessed in accordance with the requirements of US Federal Register Notice 9 CFR Part 417 Docket number 00-022N dated 7th October 2002, and that appropriate controls and interventions are in place to reduce, eliminate or control *E. coli 0157:H7*.
- Meat Hygiene Assessment monitoring procedures are in place ensuring the monitoring, and effective implementation of all Work Instructions, Standard Operating Procedures and Approved Programs in maintaining hygienic work practices and safe handling of product preventing cross contamination.
- Inspection of all incoming consignments of product for temperature compliance & macro-contamination. Pre-trimming of all products prior to boning/fabrication ensuring knife trimming of all contamination.
- Effective implementation, control, monitoring and recording of all Standard Operating Procedures pertaining to storage and product transfer temperatures. Ensuring rapid turnover of product, good process flow ensuring adequate product flow & turnover, product is held under refrigeration whenever any processing delay may be expected.
- Adequate facilities for rapid freezing of all products are provided reducing the meat temperature to -10°C or less rapidly.
- Product storage facilities are provided to maintain an ambient storage air temperature of -10°C or less.

SUPPLYING SLAUGHTERING ESTABLISHMENT *E. coli* 0157 INTERVENTIONS.

- Slaughtering Establishments supplying product to Establishment 5642 have provided letters of assurance that their establishments have many effective intervention measures in place to reduce or eliminate the presence of *E. coli* 0157 and that the product is produced in accordance with HACCP plans which have reduced to prevalence of *E. coli* 0157 to undetectable levels.

VERIFICATION OF INTERVENTION EFFICACY

The efficacy of these interventions are verified by microbiological testing for *E. coli* 0157:H7. Microbiological testing is used to also verify the effectiveness of interventions and process controls at slaughtering or supplying establishments by sampling each supplying establishments product, on each processing day.

Verification Testing of product for *E. coli* 0157:H7 is performed by an external contract laboratory (OPUS MQT) using AOAC Official Method 996.09 "VIP for EHEC" (Visual Immunoprecipitate Assay for EHEC). One sample is randomly collected from each supplier establishment's product each day from inside a packed carton of Beef Manufacturing Meat just prior to carton closure & sealing. Sample sizes are 25 grams and the following is a summary of test results.

Only product compliant with HACCP requirements and has tested negative for *E. coli* 0157:H7 is shipped to the USA.

Testing for *E. coli* 0157:H7 has been conducted for a number of years, within this time no positive results have been detected. Should a positive *E. coli* 0157:H7 be detected, **all meat from that production day will be re-directed to a thermal processing establishment and is NEVER exported to the USA.**

E. coli 0157:H7 Testing Summary:

Sample Frequency: **1 : 500 Cartons**

Total Number of Samples tested: **206**

Total Number of Negative Sample Results: **206**

Total Number of Positive Sample Results: **0 (Zero)**

Company Objectives & Management Commitment.

Waltell Pty. Ltd. is a company committed to quality.

Waltell Pty Ltd is committed, to implementing and maintaining compliance with the HACCP Plan, Quality Policies, Standard Operating Procedures and Specifications set out in the Meat Safety Quality Assurance (MSQA) System Manual and also in conformance with the requirements of AUS-MEAT accreditation standards, and to further comply with the Export Control Act & subordinate legislation, the Australian Meat & Livestock Industry Act 1997 and subordinate legislation, and all of the Australian Standards relating to production of meat for human consumption in precedence over any company procedure or proposed action.

Due to the reassessment of Establishment 5642's HACCP Plan and of its continued effective operation detailed in the information provided here, Establishment 5642 has concluded that E. coli 0157:H7 has been reduced to below detectable levels.

Sincerely,

A handwritten signature in blue ink, appearing to be 'R Ryan', written in a cursive style.

Robert Ryan
Group Quality Assurance Manager