

RAMSEY FOOD SECURITY LTD

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E.coli 0157:H7 Assurance Statement.

10/4/2003

To whom it may concern:

Establishment No.0157 Ramsey Food Processing located at Armidale Road South Grafton N.S.W. Australia confirms that its HACCP plan has been reassessed in accordance with US Register Notice CFR part 417, Docket Number 00-022N dated 7 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 HACCP plan.

Directly following the reassessment AQIS i.e Australian Quarantine and Inspection Service audited and approved the reassessed HACCP plan for Establishment 0157 on the 4th of February 2003. This reassessed plan is subject to monthly independent verification by AQIS.

Establishment 0157 slaughters, chills, bones and freezes beef and veal in an ongoing process with boning taking place the day following slaughter all packed product is frozen on the Establishment. Only boxed frozen Boneless Beef is exported to the United States of America. This establishment has a comprehensive Food Safety system comprising a HACCP plan, a zero tolerance management plan and a suite of prerequisite Standard Operating Procedures for good management practice.

PREVENTION

Process steps and procedures are identified within the HACCP plan intended to prevent the contamination of carcasses from *E.coli*0157:H7 and other pathogens during slaughter, chilling, boning and freezing. These steps include:

- Washing of cattle prior to slaughter to remove all visible contamination such as mud and faecal material from the hide and feet
 - Esophageal occlusion immediately after stunning prior to hoisting the carcass.
 - Use of best practice techniques throughout the slaughter and dressing operation with adherence to a Zero Tolerance standard for Faecal, Urine or Milk contamination of carcasses.
 - Use of best practice techniques for carcass chilling and throughout Boning, Packing and Freezing.
- Standard Operating Procedures for:
- Personal Health and Hygiene
 - Hygiene and Sanitation
 - Maintenance
 - Training
- Written Work Instructions for all operational tasks.



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CRITICAL CONTROL POINTS

The reassessed HACCP plan at Establishment 0157 identifies critical control points at three steps in the production of frozen boxed beef:

1. Carcase Hygiene Inspection station on the Beef Slaughter Floor – all evidence of faecal, urine or Milk contamination on carcase surfaces must be removed prior to this station.
2. Chilling of Beef Carcasses – Reduction of carcase surface temperature to a level that inhibits Microbial Growth including *E coli 0157:H7* i.e. 7 degrees C or less within 20 hours of Refrigeration.
3. Freezing of Boxed Boneless Beef – Reduction of the contents of cartons at the thermal centre to a level that inhibits Microbial Growth including *E coli 0157:H7* i.e. 7 degrees C or less within 20 hours of freezing commencing.

VALIDATION

Results from the testing of samples for *E coli 0157:H7* drawn from 4630 boxes of boneless beef were analyzed as part of the HACCP reassessment these samples were collected and tested from randomly selected cartons throughout the production cycle encompassing all seasons spanning the period 8th February 2001 to 15th January 2003. Collection and testing methods are detailed below. No detections of *E coli 0157:H7* were detected in the samples submitted for laboratory examination by Establishment 0157.

Test results from the AQIS microbiological testing program ESAM were also considered when reassessing the HACCP plan this testing covered the period May 1998 to January 2003.

VERIFICATION

In addition to generic *E coli* and *Salmonella* testing daily microbial testing for *E coli 0157:H7* is used in verification of the HACCP plan at Establishment 0157 in accordance with the following protocol:

Sample Selection

A minimum of 7 cartons per production shift are sampled for *E coli 0157:H7* from a production of 700 cartons of manufacturing beef per shift. Selection is random throughout the shift.

Sample Collection

Samples are collected by trained Quality Assurance personnel prior to carton closure. Two samples each approximately 37.5 grams are taken from each carton sampled and placed in a clean aseptic plastic bag. Samples are identified so that traceback provisions can be implemented if required.



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Samples are packaged and dispatched to a NATA accredited laboratory on the day of collection.

Testing

Testing is performed off site at a NATA accredited laboratory
Test method is approved by the US Association of Official Analytical Chemists
BAX for *E coli* 0157:H7 method 990701 is used for testing for *E coli* 0157:H7
All testing is performed within 24 hours of sample collection.

No detections of *E coli* 0157:H7 have been recorded under this verification testing program since AQIS approval of the reassessed HACCP plan.

With the reassessment of the HACCP plan at Establishment Number 0157 and the continuing effective operation of the overall package of measures that constitute its Food Safety Program Establishment 0157 has concluded that *E coli* 0157:H7 has been reduced to below detectable levels.

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

Ramsey Food Processing Pty. Ltd. is fully committed to the principle of pathogen reduction and production of cartoned beef to the highest standards of food safety. If you require further information please do not hesitate to contact me.

Kel Sherry
Quality Assurance Manager
Ramsey Food Processing P/L