

E C THROSBY PTY LTD

Livestock Buyers and Meat Exporters

E-Mail: ethrosby@nobbys.net.au

Phone: 61-2-65747777 Box 3050, SINGLETON DC 2330

Fax: 61-2-65747208 Old North Road, Cnr. Golden & New England Hwy.
WHITTINGHAM NSW 2330

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To Whom It May Concern,

Establishment 0486 slaughters and de-bones beef in a continues process. All meat that is exported to the US is in the form of frozen boxed meat.

Establishment 0486 confirms that its HACCP plan has been reassessed in accordance with US Register Notice 9, 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 Company's HACCP plan.

Directly following the reassessment, Establishment 0486 had the HACCP plan audited and approved by the Australian Quarantine and Inspection Service (AQIS) on the 22nd of January 2003 and is subject to independent verification at least on a monthly basis by the AQIS Area Technical Manager.

PREVENTATIVE MEASURES

Establishment 0486 has a comprehensive food safety system based on a validated HACCP Plan that is reflected in the companies Standard Operating Procedures and Zero Tolerance Management plan.

There are steps identified within the reassessed HACCP plan that are designed to prevent contamination of carcasses from E coli 0157:H7 and other pathogens, these steps include:

- Washing of livestock prior to slaughter to remove visible contamination such as mud and dung (feed lot cattle are not slaughtered at establishment 0486).
- Oesophageal occlusion during the sticking operation and prior to hoisting.
- Best practice techniques during carcass dressing including freeing and bagging of the bung.
- Standard Operating Procedures (SOP's) such as:
 - Staff Health and Hygiene.
 - Sanitation program including both post-operational and operational sanitation practices.
 - Hot Boning Program
 - Refrigeration Program
- Detailed Work Instructions for all operational tasks performed.
- During processing, the carcass are subject to a final inspection and trim, this operation has been nominated as a **critical control point** (as mandated by AQIS) for the identification and removal of zero tolerances defects.

INTERVENTIONS

Establishment 0486 applies interventions at the following points during production:

1. Final trim on the slaughter floor – to remove by knife trimming any evidence of contamination by visible fecal material and other macro contamination.
2. At freezing following packing – to achieve log CFU reduction in the population in E coli 0157:H7 through inactivation during the freezing process.

VALIDATION

As part of the HACCP reassessment, results from E.coli 0157:H7 sampling, that were uniformly collected throughout production and across all seasons, for the past two years were reviewed, there were

approximately 4600 boxes of meat sampled for E. Coli 0157 H7. Out of the 4600 samples there were no detection to E Coli 0157 H7.

Also analysed were 147 Salmonella samples that were collected as per the AQIS Salmonella testing program and there were no detections.

The efficacy of the HACCP plan for controlling E coli 0157:H7 and other pathogens is verified by ongoing microbiological sampling as described in the companies E.coli 0157:H7 Testing Program. All product lines that are destined for US grinding Establishments are subject to E coli 0157:H7 sampling:

- Sample Selection:
 - A minimum of 5 cartons per 700 cartons produced for US Grinding Establishments are sampled for E.coli 0157:H7. The 5 sample cartons are selected at random throughout each production shift.
- Sample Collection:
 - Samples are collected by trained Quality Assurance Staff prior to carton closure.
 - Samples are collected by use of Sterile Specimen Sponge in Sterile Whirlpak Sample Bags.
 - Immediately prior to collection 25ml of Butterfield phosphate diluent is added to the sponge bag.
 - Samples are taken from the surface area of the cartoned product using a 10mm x 10mm template as per Mega Reg requirements.
 - Moistened sponge is wiped over selected template area 10 times in one direction then 10 times in perpendicular direction. This is done in two separate locations.
 - Samples are sealed, packaged and couriered to a NATA Accredited Laboratory on the day of sample collection.
- Testing:
 - Testing is performed by an off site NATA accredited laboratory
 - Test method is approved by the US Association of Official Analytical Chemists (AOAC)
 - VIDAS method is used for testing for E coli 0157:H7 – VIDAS E.coli 0157:H7 (ECO) is an automated qualitative test used on the VIDAS system for the detection of Escherichia coli serotype 0157 in food products using the ELFA technique (Enzyme Linked Fluorescent Assay).
 - All testing is performed no longer than the following day from sample collection.
 - Statement 1: “Only product that is compliant with the HACCP requirements and tested negative for E.coli 0157:h7 is shipped”.

Establishment 0486 is a hot boning process, the Company’s Hot Boning Program has been developed by the CSIRO and designed with a strict protocol for time temperature requirements that is exercised together with effective freezing and have a 1 to 3 reduction in the growth of microorganisms including pathogens such as E coli 0157:H7. It has been validated by Food science Australia that the Companies Hot Boning Program can meet these time temperature requirements and has been approved by the Australian Quarantine and Inspection Service. Ongoing validation that the time temperature requirements are met is by the date collected through the placement of at least one data logger into a box of meat during the freezing process.

Establishment 0486 provides a signed declaration stating that E coli 0157:H7 sampling is being performed on all bulk packed meat destined for the US market, this declaration accompanies the export documentation for each respective shipment.

E.C Throsby Pty Ltd is fully committed to reducing micro contamination on meat and producing a safe and wholesome product of the highest quality. If you require further information please do not hesitate to contact me.

Brett Botfield
Quality Assurance Manager
E.C.Throsby Pty Ltd

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