



NOVATERRA, S. A.

"The Best Quality in Beef"

January 06th, 2012.

To Whom It May Concern:

Novaterra S. A. Establishment No. 2 is admissible to export to the United States and in accordance to the policy on the control of E. Coli O157: H7, Novaterra S.A. reassessed its HACCP plan in accordance to Federal Register Notice 9 CFR 417 E. Coli O157: H7 Contamination of Beef Products and the FSIS Directive 10 010.1. Novaterra S.A, is reassessing its HACCP plan in accordance with the new regulations and notice 65-07. The establishment has permanent Official Inspection of the MAG-FOR, Farming and Forest Ministry.

Verification Activities

- The CCP have been developed and implemented according to the USDA guidelines.
- Verification activities include internal microbiological sampling.
 - Generic E. coli: 1 test per 300 carcasses. (Federal Register Vol. 61. No 144) and random testing in trimmings. (Internal process control) (AOAC 998.08)
 - E. coli O157: H7: random testing of trimmings every day. (No.2000.13 (20 hour enrichment) REVEAL Microbial screening test)
- Official testing by the MAG-FOR. Farming and Forest Ministry, includes testing of carcasses and trimmings for Generic E. coli, E. coli O157:H7, Salmonella spp. Antibiotics, Hormones, Chloramphenicol, Organophosphate, Sulfonamide, Metals, Benzimidazols and Ivermectine.
- Novaterra S. A. Establishment 2. Is testing for E. coli O157: H7 since 2005 and NEVER had a positive test. Novaterra S. A. Establishment 2 will notify the MAG-FOR immediately if a positive E.Coli O157; H7 is detected.
- All the shipments sent to the United States have a documents certifying that the products have been tested in accordance to the Nicaragua testing program for Escherichia coli O157:H7, and are negative for this pathogen.

Microbiological Intervention

The establishment has in place an organic acid spray system, which sprays 100% of the carcasses in the slaughter floor. The organic acid used is Acetic Acid at a concentration of 2% y el PH 3-4 as recommended in the FSIS Directive 71-20. Amendment I- Safe and suitable ingredients Used in the Production of Meat and poultry products.

Control of SRMs

Since December 2005, Novaterra S. A. included in the process the procedures to remove, segregate and dispose the SRMs, to assure that all the products exported to the United States are free of SRMs and safe for human consumption. Novaterra has implemented the appropriate programs/policies to ensure compliance with FSIS Notice 56-07 and 9 CFR Parts 310, 311, 313, 319, etc. These Notices and Rules deal with three Regulations that prohibit the slaughter of non-ambulatory disabled cattle, a description and requirement to remove specified risk material (SRM) that are considered to be inedible, and restricts the use of captive bolt stunners that deliberately inject compressed air into the cranium of an animal.

Novaterra has programs and policies in place that prohibits the use of classified non-ambulatory (downers) from our food chain. We are currently identifying all animals that are classified as 30 months of age or older using dentition identification on the slaughter floor.

All SRM's are removed from the edible food chain (from all animals - all tonsils and the distal ileum of the small intestine; and from animals 30 months or older the head - skull, eyes, brain, and trigeminal ganglia; and the vertebral column - spinal cord and dorsal root ganglia).

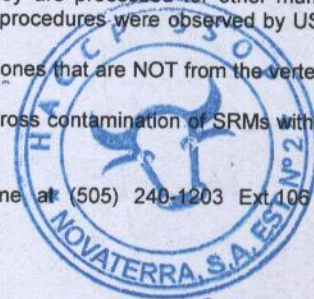
- Non- ambulatory animals are not permitted to enter the slaughter floor. These animals are humanely slaughtered on site and brain samples are collected by the official veterinary to analyze for BSE.
- All the ambulatory animals in Novaterra, S.A, are slaughtered with a non-penetrative pneumatic stunner or by ritual slaughter; both methods leave the brain intact to prevent a contamination of brain SRMs to the rest of the carcass.
- Carcasses are processed as older than 30 months of age. The spinal cord and tonsils are completely removed. The rest of SRMs are sent to other process floor where they are processed for other markets different from United States, or disposed and sent to rendering. These procedures were observed by USDA auditors and not objected.
- The products exported to the United States are either boneless or with bones that are NOT from the vertebral column.
- Novaterra S. A. has taken all the measures to assure that there is NO cross contamination of SRMs with the carcasses.

If you have further questions or concerns to this matter, please contact me at (505) 240-1203 Ext.106 or, laboratorio@novaterra.com.ni

Sincerely

Cecilia Tellez

Ing. Cecilia Tellez- Coordinador HACCP.



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