

FRIGORIFICO LAS PIEDRAS

Sociedad Anónima



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MONTEVIDEO-URUGUAY

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To whom it may concern

STATEMENT OF COMPLIANCE

Frigorífico Las Piedras S.A. (Establishment 379) is approved by the US Food Safety and Inspection Service (FSIS) to produce for export boneless beef. The plant premises and its HACCP Plan had been audited by the FSIS reviewer in January, 2003, and both were found to be acceptable.

All pre-requisites programs (Sanitation Standard Operating Procedures and Good Manufacturing Practices) are approved by the Uruguayan Meat Inspection System and are monitored on a regular basis by the FSIS Reviewers.

The plant has a full time government veterinary team presence at all time during slaughtering and deboning. Additionally, there is a regular audit process and supervision performed by the Uruguayan Meat Inspection System reviewers.

The HACCP Plan for this plant has been reassessed to determine whether or not E. Coli O157:H7 is a hazard that is reasonably likely to occur. This is not accordance with the requirements of the United States Federal Register Notices (67 FR 62325) 9CFR, Part 417 (Docket Number 00-022N) dated October 7, 2002, titled "E. Coli O157:H7 Contamination of Beef Products". The HACCP Team concluded, and the President of the company agrees, that E. Coli O157:H7 is a hazard reasonably to occur in its products without the implementation of a HACCP Plan.

The reassessed HACCP Plan includes the following interventions and other measures to reduce, eliminate or control E. Coli O157:H7.

Rejection of cattle with heavy hide faecal contamination and spray washing of the animals for slaughter. In Uruguay all animals are raised on pasture or naturally occurring grass and are ~~not~~ contaminated with dogs, as is usually encountered with cattle from grain feed lots.

Occlusion of the esophagus with a rubber ring to prevent contamination from the gastrointestinal content.

The bung is cleared and sealed with a rubber ring and then covered with a plastic bag to prevent spillage.

Use of two knives for hide removal operations.

Hygienic dressing controls to assure compliance with zero faecal contamination on the carcass at the completion of the slaughter dressing process.

All the operators are fully trained with the training emphasis being to full follow hygienic procedures to avoid contamination. The dressing operations are regularly monitored to ensure that task descriptions are being followed. Any non-compliance is formally corrected by the supervisor and preventive measures are taken.

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All carcasses are subject to inspection for the presence of faecal contamination, prior to leaving the slaughter floor. Any found with contamination are retained for knife trimming and subjected to re-inspection prior to leaving the slaughter floor.

The carcasses are rapidly dry chilled. Freezing of deboned meat is done in an automatic continuous tunnel (carton freezer). The parameters of refrigeration have been validated by the Meat Inspection System and the records are reviewed on a daily basis.

All the quarters for boning are subjected to re inspections and the pre cut program ensures that all quarters are free of visible defects and clean prior to the commencement of cutting.

A random inspection programme checks products immediately prior its leaving the cutting room. The program monitors defects trends as well as identifying critical defects. Appropriate corrective and preventive actions are specified including product rework.

The efficacy of those interventions are verified by microbiological testing of boned product for E.Coli O157:H7. This testing programme, for plants exporting beef to the United States, began in September 1999. This programme is used with the understanding of exporters and importers, that it meets the requirements of US/FSIS Directive 10010.1.

Five cartons (24.240 kg) of beef are randomly selected each day. A composite sample of 25 gr. is collected from multiple locations within each carton, and composited (125 gr.) for analysis. All analyses are carried out in the laboratory of our plant, which is approved and audited by the Uruguayan Government. Analytical methods meet the requirement of US/FSIS Directive 10010.1, and include enrichment, screening with AOAC approved ELISA kits, and isolation using Immunomagnetic separation (IMS) procedures.

From the commencement of testing in September 1999, 2745 cartons have been tested for E.Coli O157:H7 none of which has returned a "positive" detection as May 2003. Should a positive detection be made, then procedures are in place to prevent the shipment of this product. Only product that is in compliance with the monitoring requirements of the HACCP Plan and tested "negative" for E.Coli O157:H7 is shipped.

In the last 6 years Salmonella has no been detected in any randomly selected carcass sample tested in this plant and processed in the Uruguayan Government laboratory.

Conclusion: from the information outlined above it is concluded that E.Coli O157:H7 is a hazard unlikely to occur on beef produced at Frigorífico Las Piedras (Establishment 379).

Frigorífico Las Piedras S.A. is committed to producing the highest quality and safest product possible. If you require further information please feel free to contact me.

by FRIGORIFICO LAS PIEDRAS SA



Dr. Julio Cesar Diaz Alonso (DVM)
Food Safety & Quality Assurance Manager