



FRIGORIFICO PUL
COOPERATIVA AGROPECUARIA

STATEMENT OF COMPLIANCE

1. PUL (Establishment N°7) is approved by US Food Safety and Inspection Service (FSIS) to produce for export of bovine meat and bovine offal.
2. In the Federal Register, Vol. 61, N° 144, 23 July 1996 FSIS released the PR/HACCP Rule (also referred to as the Meats Regs). The Pathogen Reduction (PR) component mandated a program of bacteriological testing of bovine carcasses for presence of *Escherichia coli* and *Salmonella* spp. bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.
3. The company has in place a fully documented HACCP-based quality assurance system. This program:
 - Complies with Uruguayan Ministry MGAP guidelines for meeting FSIS Pathogen Reduction/HACCP requirements; and
 - is audited by on-plant MGAP supervisors;
 - audited at least once a month by external MGAP officers; and
 - has been subjected to a detailed verification audit by external MGAP auditors and found to meet MGAP and FSIS requirements; and
 - was most recently audited by FSIS officers in 2001 and 2002 and accepted as satisfactory.
4. In the last two years, *Salmonella* has not been detected in any randomly selected carcass sample tested.
5. In relation to *E. coli* O157:H7, establishment 7 confirms that its HACCP plan has been reassessed in accordance with Federal Register Notice 9 CFR Part 417 Docket Number 00-022N dated 7 October 2002 and titled *E. coli* O157:H7 Contamination of Beef Products. The HACCP Team concluded, and the Senior Management Team agrees, that *E. coli* O157:H7 is a hazard reasonably likely to occur in its products without the implementation of the HACCP plan. The MGAP technical inspection service has recently audited and approved the establishment HACCP plan.
6. The reassessed HACCP plan includes the following interventions and other measures:
 - Washing or rejection of cattle with heavy hide faecal contamination (verified by inspection of hide on carcasses by Quality Assurance staff)
 - Occlusion of the esophagus after stunning and/or bleeding (verified by observation by Quality Assurance Staff of nominated operatives carrying out their work procedures)
 - Use of 2 knives for hide removal procedures (verified by observation by Quality Assurance Staff of hide removal Operatives carrying out their work procedures)
 - Identification, using tags, of carcasses where faecal/ingesta leakage is suspected or occurs during dressing procedures which prepares for removal of the gastrointestinal tract (verified by observation by Quality Assurance Staff of nominated Operatives carrying out their work procedures)
 - Tugged carcasses subjected to intensified inspection and, where necessary, intensified trim and operational sanitation procedures prior to chilling (verified by observation by Quality Assurance Staff of nominated Trimmer carrying out his/her work procedures)
 - Carcasses are rapidly dry chilled. Cooling (chilling or freezing) of offals and boned meat exceeds the time/temperature requirements of the Uruguayan Government's Export Meat Orders.



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to reduce, eliminate or control E. coli O157:H7.

- 7 The efficacy of these interventions are verified by microbiological testing of boned product for E.coli O157:H7 at the rate of 1 carton in 120 cartons of manufacturing beef nominated by Customers for export to USA. That is the testing rate agreed by Uruguayan Meat Council, Burger King Corporation.

In the last two years, (Uruguay has not been able to export to USA) 117 samples from cartons of manufacturing meat have been tested for E. coli =157:H7 and none has returned a positive detection of E. coli O157:H7. If a positive detection were made, procedures are in place to prevent shipment of product. Only product that is compliant with HACCP requirements and tested negative for E. coli O157:H7 is shipped.

- 8 Following the reassessment of Establishment 7's HACCP plan its continued effective operation, as detailed above, Establishment 7 has concluded that the prevalence of E. coli O157:H7 has been reduced to undetectable levels. PUL testing program conducted for the lot from which this consignment was taken was found to be negative.

PUL is committed to producing the highest quality and safest product possible. If you require further information please do not hesitate in contact me.

Yours sincerely,

Alejandra Silveira
Technical and Quality Assurance Manager
Frigorifico PUL



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