



Australian Agricultural Company Limited
Northern Australian Beef Limited
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18th of January, 2018

US Supply Letter of Guarantee

**AACo Northern Australian Beef Limited
Establishment 800**

1. Establishment Registration

Australian export operations are conducted under the regulatory controls of the Department of Agriculture and Water Resources (DAWR). DAWR is the Federal Government authority responsible for Food Safety, Overseas Country Requirements and Australian Export Standards, ensuring the exported / supplied product is fully compliant with Foreign and Australian government requirements.

Health Controls

DAWR veterinary officers have, in addition to disease/ health control, a full time on plant role monitoring and auditing company performance in the discharge of their obligations under DAWR Approved Programs.

Overseas Listing

Establishment 800 is USA listed and operates under a DAWR Approved Arrangement program to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

2. HACCP Plan

The Approved Arrangement program incorporates HACCP. The HACCP plan contains CCP's which directly address the hazard of Shiga toxin-producing *Escherichia coli*.

HACCP Reassessment

The HACCP plan has been reassessed in accordance with DAWR Meat Notice 2002/13 and Federal Register Notice 9 CFR part 417 Docket Number 00-022 N dated 7 October 2002 - *E.coli* O157:H7 Contamination of beef products and DAWR MM 1231 - United States of America - Management of Shiga Toxin Producing *Escherichia coli* in Beef intended for Grinding.

This included the hazard consideration within the HACCP plan of the additional non 0157 STEC's 026, 0111, 045, 0103, 0121 and 0145.

The HACCP reassessment has determined that while STECS may be a potential hazard on incoming cattle it has been concluded that due to the effective implementation of the HACCP plan and Sanitary Standard Operating Procedures the hazard has been effectively controlled resulting in it not being reasonably likely to occur on product and the current HACCP plan is adequate to address these hazards.

The-reassessed HACCP Plan reviewed all steps-in the-process including the following interventions:-

- DAWR ante mortem inspection on all livestock pre-slaughter;
- Identification and management of ill or injured livestock.
- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export;
- Cattle are assessed for cleanliness prior to slaughter;
- Use of highly trained operators;



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- After stunning - sealing of weasand by application of a clip/plug to prevent spillage;
- Sealing of the bung via bagging to control cross contamination;
- Line speeds to provide adequate time for hygiene inspections and dressing of the carcase;
- Sanitising hands and equipment between carcases for high risk activities;
- Knife sterilisation between carcases;
- All carcases are subjected to a final inspection and hygiene trim;
- Zero tolerance controls are in place for managing contamination from faeces, ingesta and milk spillage;
- Chilling and freezing regimes to control microbial growth;
- Product hygiene is monitored daily following the DAWR meat hygiene assessment guidelines;
- Documented Corrective and Preventative actions are in place and followed;
- Microbial testing of contact surfaces and product.

3. Verification *E.coli* O157:H7

Sampling

To verify the ongoing effectiveness of these interventions Establishment 800 conducts sampling and testing of Beef Trimmings for *E.coli* O157:H7 in accordance with DAWR Meat Notice 2012/04 *Escherichia coli* O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N=60 Method).

Hold and Release

All product is subject to a 'Test, Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and returned negative test results for *E.coli* O157:H7 are released for shipment.

Laboratory

Samples are tested by an ISO17025 accredited laboratory approved to conduct testing of meat products for *E.coli* O157:H7.

Testing

Screening tests for *E.coli* O157:H7 are performed using AOAC 2005.04 Assurance GOS and AOCC 031002 BAX Real time. Potential positives are confirmed using the BAX.

BSE

Australian legislation prohibits the feeding of all Restricted Animal Materials to all ruminants, including cattle. All beef products destined for the USA are free from Specified Risk Materials (SRM). Product from all non-ambulatory, disabled or downer cattle is excluded from export.

Yours Faithfully

Ashleigh Crisp

Quality Assurance Manager