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16/01/2017  
Montevideo, Uruguay

To Whom It May Concern:

#### STATEMENT OF COMPLIANCE

- 1- **Frigorífico Suc. Carlos Schneck S.A. (Establishment N° 52)** is approved by Ministry of Livestock, Agriculture & Fisheries (MGAP – Uruguay) to produce for export bovine meat. The Establishment is approved by US Food Safety and Inspection Service (FSIS).
- 2- The Company has implemented HACCP since Jan 25, 1999. It has been evaluated and approved by National Authorities and audited by USDA inspections.  
The Pathogen Reduction (PR) component mandated a program of bacteriological testing of bovine carcasses for the 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- Our company has in place a fully documented HACCP program, which:
  - Complies with MGAP guidelines for meeting FSIS Pathogen Reduction /HACCP requirements
  - Is audited by on-plant MGAP Inspectors
  - Is audited at least each month by external MGAP Supervisors
  - Was audited by FSIS officers on August 05<sup>th</sup>, 2009 and accepted as satisfactory (HACCP plan and prerequisite programs).
- 4- In the last two years, *Salmonella* spp. has not been detected in any randomly selected carcass sample tested.
- 5- The Company also:
  - complies with MGAP regulations (Official Regulation of Veterinary Inspection N° 369/83)
  - Is licensed by National Meat Institute (INAC) and MGAP for the slaughter of cattle for the production of meat for the Uruguayan market.
- 6- In relation to *E. coli* 0157:H7, establishment 52 confirms that its HACCP Plan has been reassessed in accordance with 'Federal Register Notice 9 CFR Part 417 Docket Number 00-022 N (dated 7 October 2002 and titled: "*E. coli* 0157:H7 Contamination of Beef Product") and FSIS





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Notice 65-07 (dated 12 October 2007 and titled "Notice of Reassessment for E. coli O157:H7 Control and Completion of a Checklist for All Beef Operation").

In 2012 the HACCP Plan has been reassessed in accordance with FSIS regulations to consider non-O157 Shiga toxin-producing Escherichia coli (STEC) (six relevant non-O157 STEC serogroups - O26, O45, O103, O111, O121, and O145) in its hazard analysis.

- 7- Sanitation procedures and intervention methods used during slaughter and all process are made to prevent fecal/ingest or milk contamination, cross contamination and to reduce microbial load. All these procedures are fully itemized and explained in our GMP, SSOP and HACCP plan.

The reassessed HACCP Plan includes the following interventions and other measures, to reduce eliminate or control E. coli O157:H7 and non-O157 Shiga toxin-producing Escherichia coli (STEC) (six relevant non-O157 STEC serogroups - O26, O45, O103, O111, O121, and O145):

- Washing of cattle prior to the slaughter
- Occlusion of the esophagus after stunning and bleeding
- Use of 2 knives for hide removal procedures
- Identification and removal by knives in carcass where fecal/ingest or milk leakage is suspected or occurs during dressing slaughter procedures. (PCC 1 – HACCP Plan)
- Line speeds appropriate to providing adequate time for operators to complete inspection and hygienic dressing of the carcasses
- Sanitizing hands and equipment between carcasses.
- Prevention of carcass to carcass cross contamination by spacing on lines and in chillers.
- Chilling and freezing regimes to control microbial growth.

These procedures are verified by Quality Assurance Department and Official Inspection.

- 8- The efficacy of those interventions is verified by microbiological testing of product for E. coli O157:H7 at the rate of 5 samples (N=60) per lot of production of manufacturing beef nominated by the Customer for export to the USA and six relevant non-O157 STEC serogroups (O26, O45, O103, O111, O121, and O145; which are tested at the Official Laboratory of MGAP. Since January 2015, E. coli O157:H7 and the six non-O157 STEC serogroups are tested per each lot of production of manufacturing beef nominated by the Customer for export to the USA.





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From January 2011 to December 2015, 3185 samples from cartons of manufacturing beef have been tested for E. coli O157:H7 and none have returned a "positive" detection. The following years are described in the table below.

Year	Samples	"positive" detection
2011	590	0
2012	740	0
2013	505	0
2014	810	0
2015	540	0
2016	500	0

If a "positive" detection is obtained, 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.

The samples are tested for E. coli O157:H7 using the AOAC Official Method N°2000.14, Gold-Labeled Immunosorbent Assay (ELISA)

During 2016, 458 samples have been tested for non-O157 STEC serogroups (O26, O45, O103, O111, O121, and O145) and none has returned a "positive" detection.

9- Following the reassessment of Establishment 52 HACCP Plan, as detailed above, Establishment 52 HACCP team has concluded that the prevalence of E. coli O157:H7 and non-O157 Shiga toxin-producing *Escherichia coli* (STEC) (six relevant non-O157 STEC serogroups (O26, O45, O103, O111, O121, and O145)) are a hazard reasonably likely to occur in its product without the implementation of a HACCP Plan, and due to the effective implementation and its continued effective operation, the hazard is controlled and reduced to undetectable levels.

10- On May 25<sup>th</sup>, 2006 the World Organization for Animal Health (OIE) has declared Uruguay free from Bovine Spongiform Encephalopathy (BSE).

To fulfill the USDA BSE SRM Regulations, the following procedures are developed and implemented for all cattle in Frigorifico Suc. Carlos Schneck:





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- Separation and handling of non-ambulatory animals. The non-ambulatory animals do not enter into the slaughter, they are sacrificed in a separated facility and is digested and incinerated.
- The stunning is not carried out with captive bolt with air injected equipment
- Extraction and elimination of skull, eyes, trigeminal ganglia and tonsils.
- Extraction and elimination of brain and rachides bulb. Avoiding the contact with edible products.
- Extraction and elimination of the vertebral column and dorsal root ganglia.
- Removal of at least 80 inches of the small intestine as measured from junction of the ileum and the cecum
- The meat products to be exported do not contain mechanically recovered meat
- The equipment used to cut trough SRMs is for exclusive use and the routine operational sanitation procedures are applied on them
- All the procedures for removal, segregation, and disposition of SRMs, are carried out avoiding the contact with edible products. If contact between SRMs and edible products exists, the contaminated areas are considerate as SRMs.

In relation to BSE and SRM, establishment 52 confirms that its HACCP PLAN has been reassessed in accordance with Federal Register 9 CFR Parts 309, 310 – 318, dated 13 July 2007 and titled "Prohibition of the Use of Specified Risk Materials for Human Food and Requirements for the Disposition of Non-Ambulatory Disabled Cattle; Prohibition of Use of Certain Devices Used to Immobilize Cattle During Slaughter" (FSIS Notice 56-07)

Suc. Carlos Schneck S.A. is committed to producing the highest quality and safest product possible.

If you require further information, please feel free to contact us.

**Dr. Robert Uhlig**

**Quality Assurance Manager**

**Suc. Carlos Schneck S.A - Establishment N° 52 - URUGUAY**