

Industrial Plant: Ruta 14, 170 km, Durazno, Uruguay.

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## **HACCP STATEMENT OF COMPLIANCE**

- 1. Breeders and Packers Uruguay S.A. (BPU Meat) Establishment Nº 310, is approved by the US Food Service and Inspection Service (FSIS) and by the CFSI from Canada to produce for export bovine meat.
- 2. Breeders and Packers Uruguay S.A. Establishment Nº 310, is committed to manufacture products to the highest standards of food safety and quality.
- 3. The Company has in place a fully documented HACCP System and Pre-requisite Programs (SSOP and GMP).
  - The HACCP System is developed and implemented in accordance to the Federal Register, 9 CFR Part 304, ct al /Vol.61 Nº 144 / July 25, 1996 / Pathogen Reduction: Hazard Analysis and Critical Control Point HACCP Systems; Final rule and.
  - The Pathogen Reduction component mandated a program of bacteriological testing of bovine carcasses for the presence of Generic Escherichia Coli and Salmonella spp bacteria, to verify the effectiveness of the SSOP and HACCP plan in the plant.
  - The Company implements a testing programme for Generic Escherichia Coli in carcasses, following the Pathogen Reduction criteria from the Final Rule, one sample each 300 cattle slaughtered is randomly taken. These microbiological tests are made in an MGAP Officially approved external Lab.
  - The salmonella spp in carcasses in part of the National Program implemented by the MGAP, the samples taken by the Official Vets samples and sent to the Uruguayan Official Laboratory (DILAVE). This testing program was agreed between the MGAP authorities and the FSIS authorities. Since the testing program started in our plant (2010), Salmonella spp. has not been detected in any randomly selected carcass sample tested.
  - The HACCP Plan has been in operation since the commencement of production in the plant in June 2010
  - The HACCP Plan is audited by on- plant M.G.A.P Supervisors and is audited at least once a month by the M.G.A.P. Regional Supervisor.
- 4. In relation to the six non-O157 STEC, establishment N° 310 confirms that that is HACCP Plan was reassess according the FSIS notices May 31, 2012 (Shiga toxin –producing Escherichia coli in certain Raw Beef Products) and FSIS notices 63-12 9/27/12.



- 5. The HACCP Plan and Pre-requisite Programs include the following preventive measures, to eliminate or reduce the likely occurrence of E. coli O157:H7, Salmonella and Listeria monocytogenes to an undetectable level:
  - Ante mortem washing of dirty cattle. Holding pens sanitation is a main issue.
  - Washing hands and tools sterilization between every cattle (sterilization with hot water at 82°C minimum)
  - Use of 2 knives for hide removal procedures.
  - Prevention of carcase to carcase cross contamination by spacing on lines and in chillers.
  - Staff flow and segregation throughout the plant to identify and separate staff working in "clean areas" and "dirty areas" of the slaughter process.
  - Tying and bagging of the bung to prevent fecal contamination during dressing and evisceration process.
  - Oesophagus clipping to prevent escape of gastrointestinal content.
  - Carcasses are identified with tags in case fecal/ingest leakage occurs.
  - Evisceration table with continuous sterilization with hot water at 82°C minimum.
  - Trimming of any visible fecal/ingest / milk contamination over the carcasses.
  - 100% CCP1 Visual inspection of the carcases, prior to the veterinary inspection and carcasses washing step, with "Zero Tolerance" Criteria for fecal, ingest and milk (Ref: FSIS 6420.1). Defined corrective and preventative actions implemented when incidents are identified.
  - Carcasses washing to remove blood and saw dust.
  - Carcasses are rapidly dry chilled
  - CCP2- time/temperature measurement of carcasses at the end of the chilling process with defined corrective actions and preventive measures as required. Sampling based on UNIT – ISO 2859-1:1999 standard.
  - CCP3 100% foreign body monitoring of boneless beef products using X ray detection technology. Sensitivity of metal detection verified to 4.0mm ferrous, 4.3mm non ferrous and 3.2mm stainless steel in compliance with USDA Compliance Manual Section 555-425 Food Adulteration.
  - CCP4 100% foreign body monitoring of portion beef products using a metal detector.
     Sensitivity of metal detection verified to 2.5mm ferrous, 3.5mm non ferrous and 5.0mm stainless steel in compliance with USDA Compliance Manual Section 555-425 Food Adulteration.
  - We have strict hygiene and disinfection procedures throughout the plant, with particular emphasis on areas of direct contact with the product. We perform checks hygiene in the environmental and surfaces in direct and indirect contact (drains, floors, cool equipment, etc.) with the product, for the purpose of ensuring compliance with the established programs of SSOP. We validate all the hygiene procedures.
  - We make microbiological analysis in our final product for every lot (TVC, coliforms, E. coli generic, E. coli O157:H7, salmonella sp and listeria monocytogenes).
  - All the above mentioned procedures are fully itemized and explained in our GMP, SSOP and HACCP Plan, and verified by observation by Quality Assurance Inspectors belonging to the QA staff.



- 6. As HACCP verifications activities, Breeders and Packers Uruguay S.A. undertakes microbiological testing for E: Coli O157:H7 with a positive release procedure to prevent shipping before results are received as negative. None of the results have indicated a positive detection of E. coli O157:H7. If a "positive" detection was made, procedures are in place to prevent and avoid shipment of product. This HACCP plan has been reassessed to comply with FSIS Notice 65-07 (Notice of Reassessment for Escherichia Coli O157:H7), and only products tested "negative" for E. coli O157:H7 is shipped.
- 7. The Quality and HACCP Systems is independently audited against the Global Standard for Food Safety (BRC) version 7. The plant and HACCP system was successfully re-approved with grade AA on 11/10/2015
- 8. On May 25<sup>th</sup>, 2006 the World Organization for Animal (OIE) has declared Uruguay free from Bovine Spongiform Encephalopathy (BSE). To fulfill the USDA BSE SRM Regulations, since commencement of production in June 2010 the following procedures are developed and implemented for all the cattle in BPU Meat (Est. 310).
  - Separation and handling of non-ambulatory animals. The non ambulatory animals do not enter into the slaughter, there are slaughtered in a separated facility. The meat from these carcases are digested and incinerated.
  - The stunning is not carried out with a captive bolt with air injected equipment.
  - Extraction and removal of skull, eyes, trigeminal ganlia and tonsils, brain an rachidea bul, is undertaken avoiding the contact with edible products.
  - Extraction and removal of the spinal cord is undertaken in a dedicated area of the slaugher plant.
  - Removal of at least 80 inches of the small intestine as measured from the junction of the leum and the cecum.
  - The meat products to be exported do not contain mechanically recovered meat.
  - The equipment used to cut through SRMs is for exlusive use and the routine operational sanitation procedures ar applied to them.
  - All the procedures for removal, segregation, and disposition of SRMs, are carried out avoiding contact with edible products. If there are contact between SRMs and edible products, the contaminated areas are considerated and disposed of as SRMs.
  - In relation to BSE and SRM, establishment 310 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 the Use of Certain Stuning Devices Used To Immobilize Cattle During Slaugher" (FSIS Notice 56-07)
- 9. The Establishment does not use any kind of drugs in violation of the applicable laws in the country destination, and we are committed to produce in compliance with the National Biological Residue Monitoring Program, Law Nº 25/993 in relation to the prohibited use of drugs.
- 10. The raw material is obtained from cattle slaughtered, deboned, packed and frozen/chilled in our plant without further process.



Breeder's and Packer's Uruguay S.A. is committed to producing the highest quality and safest product possible. If you require further information, feel free to contact me.

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BPU Meat