

## STATEMENT OF COMPLIANCE

1. **FRIGORIFICO CARRASCO S.A.** (Establishment N° 3) is approved by US Food Safety and Inspection Service (FSIS) to produce for export bovine and lamb meat. We certify that our programs and operations comply with all applicable USDA-FSIS regulations and that incoming cattle comply with all applicable FDA and USDA regulations. At the same time requirements for export to Canada have been met i.e The meat derived from bovine or ovine, considered as precursor material for preparation of finished raw ground meat, is testes for the presence of E. coli O157:H7/NM according to the procedures describes in CFIA Annex O of Chapter 4 Of the Meat Hygiene manual of Procedures.

2. The **FRIGORIFICO CARRASCO** facilities are under continuous inspection by MGAP (Ministerio de Ganadería, Agricultura y Pesca), D.I.A. (Dirección de Industria Animal) personnel and we operate under "equivalent" inspection and certified by USDA-FSIS to export into the U.S.

3. **FRIGORIFICO CARRASCO S.A.** is working under an HACCP System which follows the "Pathogen Reduction; Hazard Analysis and Critical Control Point (HACCP) Systems, Final Rule. (Federal Register, 9 CFR Part 304, et al, 25 July 1996, FSIS). The Pathogen Reduction (PR) 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 GMP, SSOP and the HACCP plan in the plant.

The Company implemented a testing program for Generic Escherichia Coli in carcasses, following the Pathogen Reduction (PR) criteria from the Final Rule, one sample every 300 cattle slaughtered is randomly taken. The Company Laboratory is audited by the MGAP Authorities (Ministry of Livestock, Agriculture and Fisheries – MGAP). This program has been working since 1997.

The Salmonella spp in carcasses testing program was implemented by an MGAP official program, so the official Veterinarian Supervisor takes randomly the samples and sends them to the official Laboratory (DILAVE). This testing program was agreed between the MGAP authorities and the FSIS authorities.

4. The company has in place a fully documented HACCP System and Pre-Requirement Programs:

HACCP plan has been working since January 1998.

The HACCP plan is audited by on-plant MGAP's Supervisors and is audited at least once a month by the MGAP's Regional Supervisor.

After a new reassessment the plant has been subjected to a detailed verification audit by the MGAP's Regional Supervisor, who follows the FSIS requirements.

The company has been audited following the HACCP criteria by the FSIS officers since 1998 up today it has been accepted as satisfactory.

The HACCP System has been audited by customers' auditors.

The company has a certification of British Retail Consortium (BRC) – "GLOBAL STANDARD for Food Safety", Issue 7<sup>a</sup>, with a 3<sup>a</sup> party audit, achieved Grade **AA**.

5. The company also

Complies with the Standard Operating Procedure for Sanitation (Federal Register Vol. 61, nº 144) since 1997.

In order to achieve that, there are implemented written SSOPs & training programs sufficient to insure that all meat processing and handling equipment that contacts meat is

cleaned and sanitized properly and sanitation effectiveness is monitored at pre-operational inspection. Operational SSOPs is capable of preventing contamination of raw materials and in-process products (Employee Training, Employee Hygiene). There is documentation associated with SSOPs.

Complies with Good Manufacturing Practices, through Pre-Requirement Programs, ( Pest Control, Food Defense/Security, Allergen Control, Product Traceability and Recall drill, Water Control)

Complies with Prohibition of the Use of Specified Risk Material for Human Food and Requirements for the Disposition of Non -Ambulatory Disabled Cattle; Prohibition of the Use of Certain Stunning Devices Used To Immobilize Cattle During Slaughter; Rule (Federal Register, 9 CFR Part 309, 310 and 318, July 13, 2007. Docket Nº 03-025F); FSIS Notice 56-07 " Final regulation for non -ambulatory disable cattle and SRM's

"FSIS Directives 6100.1 (9/13/07) "Ante-mortem Inspection of Livestock" and FSIS Directives 6100.4 (9/13/07) "Verification Instruction Related to SRM" .

The Company has implemented written programs for:

- o Excluding non-ambulatory disabled livestock.
- o Prohibiting feeding of ruminant-derived proteins to ruminants, ( It is an Uruguayan law since April 18th, 1996)
- o The Company uses a captive bolt stunner. (with no air injection).
- o The Company has written procedures addressing the removal, segregation and disposal of specified Risk Materials ("SRM").
- o The Company uses a hydraulically powered Spinal Cord and the
- o Meninges remover.

Uruguay was re-certified by the OIE (World Organization for Animal Health) following the "Sanitary Code for Terrestrial Animals", Art.2.3.13.3, and it was found as a country with "Negligible Bovine Spongiform Encephalopathy (BSE) Risk", in May 25th, 2007.

Complies with the Prohibiting of use of antibiotics and other animal drugs. Is being supervised by the MGAP since 1978, through the National Biological Residues Program in Animal Origin Food.

Since 2011, is forbidden the use of antibiotics as a growth promoters (Decreto Nº 098/2011-march,2nd,2011).

Complies with the requiring that all cattle be handled in a manner compliant with standards set forth in the American Meat Institute's "Good Management Practices for Animal Handling and Stunning for Cattle" ; "Recommended Animal Handling Guidelines for Meat Packers" and "Animal Handling Guidelines and Audit Guide" written by Dr.Temple Grandin.

6. The Company maintains a **Quality Assurance** function that is adequately organized, staffed and equipped to ensure compliance with client specifications.

7. The raw material is obtained from cattle which was born and raised in Uruguay. And slaughtered, deboned, packed and frozen or chilled in our plant without further process.

8. Boning is done in such a manner as to exclude the following materials from the boneless beef: bones, bone chips, cartilage, bruises, blood clots, major lymph glands, tendons, liver, kidneys, major arteries, neck meat impregnated with blood, abdominal peritoneum, and tunic.



9. Active and positive action to ensure that "deadlocks", metal staples, and other fastening devices are not present in beef. We do not use metal staples or fasteners of any kind for packaging.
10. Boneless beef does not contain Advanced Meat Recovery (AMR) meat.
11. Packing: the Plant uses polyethylene lay and external carton boxes to assure isolation of meat from external contamination.
12. Labeling: the following items are identified: plant name, establishment N°, plant address, country of origin, net weight, product description (boneless beef), product code agreed with client, production date, "keep frozen" or "keep refrigerated", shipping mark, safe handling instructions.
13. The reassessed HACCP Plan includes the following interventions and the preventive measures, to eliminate or reduce the likely occurrence of E. Coli O157:H7 and non-O157 STEC to a detectable level.
  - Washing of cattle before slaughter.
  - Stunning box and handling area is washed between animals
  - Sterilization of tools and knives between each cattle with hot water with 82°C as a minimum.
  - Occlusion of the esophagus
  - The bung is sealed with a plastic bag and tied with a tight cord to avoid spillage
  - The permanent sterilization of the evisceration table with hot water at 82°C as a minimum
  - Trimming out of any visual contamination over the carcass
  - The HACCP Plan have the following CCPs
    - Critical Control Point in the slaughter line where a Meat Hygiene Assessment is made by a visual random inspection of the carcasses with zero tolerance criteria for fecal ingest and milk (ref. FSIS Directive 6420.2) and attendant corrective actions and preventive measures as required.
    - After slaughter carcasses are immediately chilled, the HACCP plan has a Critical Control Point at this step, monitoring time/temperature of boned meat, and attendant corrective actions and preventive measures as required.
    - Critical Control Point at the end of the final product line to eliminate foreign objects (metals, bones).

To verify the effectiveness of the HACCP Plan, there are specific verification processes.
14. The plant has other microbiological control programs than the Generic E. coli and Salmonella spp in carcasses. To verify the effectiveness of the HACCP Plan, these programs are microbiological control over carcasses and cuts, equipment and contact surfaces (environmental controls), testing for APC, Enterobacterias.
15. The efficacy of the HACCP Plan is also verified by microbiological testing of E. coli O157:H7 and non-O157 STEC (O26, O45, O103, O111, O121 and O145), carried out by Frigorífico Carrasco's own laboratory (registered as RNLN°003).

**Only product that is compliant with HACCP requirement and tested "negative" for E. coli 0157:H7 and "negative" for non-O157 STEC is shipped.**

The Plant follows the E. coli O157:H7; O157:NM and non-O157 STEC (O26,O45,O103,O111,O121 and O145 Sampling and Testing Program issued by Uruguayan Slaughter and Packerhouses Plants, which export to USA, with N=60 check sampling testing criteria for each Lot, using BAX® – PCR; Reveal Tests (Neogen).

The plant is into an Official program for E. coli O157:H7 and non-O157 STEC (O26,O45,O103,O111,O121 and O145), where the official inspectors from the Ministry Of Agriculture take samples of final product and sent for analysis to accredited laboratory.

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

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