

**Administration****Phone:** 08 8532 1955**Fax:** 08 8532 6216**Head Office**

Lot 10, Lagoon Road, Murray Bridge

**Postal Address**GPO Box 496, Murray Bridge  
South Australia 5253

---

**US SUPPLY LETTER OF GUARANTEE**  
**Thomas Foods International – Murray Bridge**  
**Establishment 533**

---

**Establishment Registration**

Australian export operations are conducted under the regulatory controls of the Department of Agriculture (DA). DA 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**

DA veterinary Officers and Meat Inspectors have in addition to disease/health control, a full time on plant role, verifying/auditing company performance in the discharge of their obligations under the DA Approved Programs.

**Overseas Listing**

TFI Murray Bridge Establishment 533 operates under a DA Approved Arrangement program and confirms that it is approved to process carcasses, primal product cuts and bulk packed boneless product including boneless manufacturing beef, as a component of product intended for grinding. Export of these products/raw materials sold, are eligible to the USA.

**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 reassessment of TFI – Murray Bridge Establishment 533 has been audited, updated in January 2016 and sent to DA for approval. The reassessment encompassed consideration of all species - Lamb, Mutton, Goat and Beef production.

TFI Murray Bridge Establishment 533 confirms that its HACCP plan has been reassessed in accordance with DA Meat Notice 2002/13 and US Federal Register 9 CFR part 417 Docket Number 00-22 N dated 7 October 2002 – E-coli 0157:H7 Contamination of beef products and DA MAA 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 being 026, 0111, 045, 0103, 0121 and 0145.

The reassessment determined that while 0157:H7 and 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 Sanitation 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 for 2015-2016 included review of the following sanitary components and interventions:

1. Sanitary dressing procedures that are designed to minimise the transfer of contamination from hide to exposed carcase surfaces;
2. Physical examination of incoming stock taking into account the age of the animals, the season of the year, the amount and placement of any contamination, excessively dirty feedlot cattle may be treated in the yards by washing, to reduce the level of soiling or the chain speed slowed to assist in the sanitary dressing of these animals. Long-woolled animals may be shorn to reduce the level of soiling or the chain speed slowed to assist in the sanitary dressing of these animals;
3. After stunning, sealing of the weasand by application of a clip/plug to prevent spillage;
4. Sealing of the bung via bagging to control cross contamination;
5. Use of approved paper to prevent wool roll back on to surface skin of carcasses;
6. Best practice techniques/procedures are used in sanitary dressing of all carcasses;
7. Procedures include the routine sanitation of equipment and the washing of hands, as well as contingency arrangements in the event of gross contamination, corrective actions to be taken and are incorporated into written work instructions and monitored in accordance with the Meat Hygiene Assessment program;
8. A 2-knife system is used to assist in hygienic processing and to help prevent cross contamination of microscopic bacteria;
9. Sanitary performance is measured through process monitoring under the ESAM program;
10. Zero tolerance is in place for faecal, ingesta and milk spillage. A CCP for zero tolerance is located at the final trim point on the slaughter floor;
11. Chilling and freezing regimes to control microbial growth;
12. Product hygiene is monitored daily following DA meat hygiene assessment guidelines;
13. Documented corrective and preventative actions are in place and are followed;
14. Microbial testing of product and surfaces is conducted;
15. Microbiological proficiency testing including E coli 0157:H7 and Salmonella is conducted;
16. Testing for Salmonella, Coliforms along with Standard Plate Counts using approved sampling methods.

#### Verification of E coli 0157:H7 Sampling

To verify the ongoing effectiveness of the above interventions, Establishment 533 conducts sampling and testing of Beef trimmings for E-coli 0157:H7 in accordance with DAF Meat Notice 2012/03 Escherichia coli 0157:H7 testing of raw ground beef components destined for export to the US and US territories (N = 60).

In 2013 Establishment 533 collected 209 samples with 2 positives for E coli 0157:H7 and 2 positives for 026.

For the 2014 year, the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> quarters have returned NIL positives for either 0157:H7 or the Big 6 STECs, with one confirmed positive 0157:H7 for the 4<sup>th</sup> quarter.

There have been NIL confirmed positives for either 0157:H7 or the Big 6 STEC's for the 1<sup>st</sup> and 2<sup>nd</sup> Quarters of 2015, with 2 confirmed positive 0157:H7 and 17 of the Big 6 STEC confirmed positive in the 3<sup>rd</sup> quarter and 3 confirmed positive 0157:H7 in the fourth quarter.

#### Hold and Release

All products are 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 0157:H7 are released for shipment.**

#### Laboratory

Sampling of meat products for E coli 0157:H7 are tested by the Plants ISO17025 NATA accredited Laboratory.

#### Testing

Screening tests for E coli 0157:H7 are performed using a DuPont Qualicon BAX® Q7. The BAX method MLG 5A.02 (also AOAC 031002) is approved by the FSIS.

Potential positive 0157 results are confirmed externally by MDU using AAS006 US FDA BAM 4a (Part K) as approved by the Department of Agriculture, Australia.

For Non-0157, MDU use AAS014 of USDA MLG 5B (Parts 7 Isolation & 8 identification) as approved by the Department of Agriculture, Australia.

#### BSE

Control measures for BSE associated SRM's are included within the HACCP plan and approved programs;

Australian legislation prohibits the feeding of all Restricted Animal Materials to all ruminants including cattle.

All beef destined for the USA are free from Specified Risk Material (SRM).



SRM is removed in accordance with the Federal Register Notice 03-0251F, therefore, being fully compliant with the McDonalds BSE Firewalls.

All non-ambulatory, disabled or downer cattle are excluded from the United States product line.

#### Interventions

On the beef slaughter floor twin oxide spraying of the cutting lines is used as an intervention step on some cattle types.

#### Validation

The current Australian regulations do not specify a temperature for frozen products – only that it must be hard frozen without delay. The scientific information for frozen beef storage life can be obtained through MLA.

#### Organic

Animals fit for the organic program must be sourced from organic approved farms, certification & an accompanying NVD must be provided to establishment prior to slaughter. Organic product is slaughtered and processed at the beginning of the production shift to maintain organic status.

#### QUARTERLY STEC DATA

Quarter	Number of Tests		Number of Confirmed Positives	
	0157:H7	Big 6	0157:H7	Big 6
1 <sup>st</sup> Quarter – Jan to March 2016	178	123	0	0
2 <sup>nd</sup> Quarter: April – June 2016	239	214	0	1
3 <sup>rd</sup> Quarter: July – September 2016	211	159	0	0
4 <sup>th</sup> Quarter: October – December 2016	166	130	0	6

This letter of guarantee is valid through to the end of January 2018.

Kind Regards,



Meagan Abbott  
Meagan.abbott@thomasfoods.com  
Phone: 08 8532 9202  
Mobile: 0418893069