



FRIGORÍFICO PANDO – ONTILCOR S.A. –
Camino de las Tropas, Ruta 75, km 34. CP 91000
Pando – Canelones – Uruguay

EXPORT ESTABLISHMENT NUMBER 439

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TO WHOM IT MAY CONCERN

-STATEMENT OF COMPLIANCE-

1. FRIGORIFICO PANDO – ONTILCOR S.A. – Export Establishment N° 439 is approved by the US Food Safety and Inspection Service (FSIS).
2. We hereby confirm that our company has in place a fully documented HACCP plan.
 - ✓ Our HACCP plan complies with FSIS Pathogen Reduction (PR) requirements. The P.R. 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 process controls for hygiene and sanitation under the plant's HACCP program.
 - ✓ HACCP plan is audited by on-plant Official Veterinary Inspectors (M.G.A.P. - Ministry of Livestock, Agriculture and Fishery of Uruguay).
 - ✓ HACCP plan and the prerequisite programs (SSOP and GMP) were audited by USDA/FSIS Authorities, January 2002, January 2003, April 2008 and accepted satisfactory.
 - ✓ Our QUALITY ASSURANCE PROGRAMME (Q.A.P) is periodically subjected to verification audits by external auditors from U.S. companies and found in accordance with FSIS requirements.
3. Since the testing program started (1999), *Salmonella spp.* has not been detected in any randomly selected carcass sample tested.

January, 2017

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4. In relation to *E.coli* O157:H7, establishment 439 confirms that its HACCP PLAN has been reassessed in accordance with Federal Register 9 CFR 417 Docket Number 00-022N (dated 7 October 2002 and titled "*E.coli* O157:H7 Contamination of Beef Products") and FSIS 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 Operations").

Since 1st June a control program for STEC has been established in accordance with the USDA FSIS

5. Sanitation procedures and intervention methods used during slaughter and all process are made to prevent faecal/ingest contamination, cross contamination and to reduce microbial load. All this procedures are fully itemized and explained in our GMP, SSOP, and HACCP plan.

The reassessed HACCP Plan includes the following interventions and other measures:

- ✓ Washing of cattle prior to the slaughter;
- ✓ Use of 2 knives for hide removal procedures;
- ✓ Occlusion of the rectum as a part of the hide removal procedures, occlusion of the esophagus after the hide removal procedures;
- ✓ Carcasses are inspected as a part of the monitoring of the CCP1. The critical limit is ZERO visible contamination regarding faecal/ingest material and milk on carcasses.
- ✓ Identification, using tags, of carcasses where faecal/ingest or milk leakage is observed.
- ✓ Tagged carcasses are segregated from the line and all visible faecal/ingest or milk contamination is promptly removed to prevent microbial contamination. The carcasses are thoroughly reinspected prior to return them to the slaughter line.
- ✓ Carcasses are rapidly dry chilled. Chilling of meat complies with the time/temperature requirements described in the CCP2.

These procedures are verified by Quality Assurance Assessors.

6. The efficacy of those interventions is validated by microbiological of product for *E.coli* O157:H7 at the rate of 5 samples/production lot of manufacturing beef, (each sample is composed of 60 piece of beef).

Since 1999 many samples from cartons of manufacturing beef have been tested for *E.coli* O157:H7 and none of the results have returned a "positive" detection.

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If a “positive” detection were made, procedures are in place to prevent and avoid shipment of product. Only product that is compliant with HACCP requirements and tested “negative” for *E.coli* O157:H7 is allowed to be shipped.

7. Following the reassessment of Establishment 439’s HACCP PLAN and its continued effective operation, as detailed above, the HACCP Team concluded that *E.coli* O157:H7 is a hazard reasonably likely to occur in its products without the implementation of a HACCP Plan.
8. On May 25th, 2006 the World Organization for Animal Health (OIE) has declared Uruguay free from Bovine Spongiform Encephalopathy (BSE).

To fulfill the USDA BSE SRM Regulations, since February 2004 the following procedures are developed and implemented for all the cattle in Frigorífico Pando:

- ✓ 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 the meat 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 rachidea bulb, avoiding the contact with edible products.
- ✓ Extraction and elimination of the spinal cord in the slaughter.
- ✓ Extraction and elimination of the vertebral column and dorsal root ganglia.
- ✓ Removal of at least 80 inches of the small intestine as measured from the junction of the ileum and the cecum.
- ✓ The meat products to be exported do not contain mechanically recovered meat.
- ✓ The equipment used to cut through 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 there are contact between SRMs and edible products, the contaminated areas are considered as SRMs.



In relation to BSE and SRM, establishment 439 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 Stunning Devices Used To Immobilize Cattle During Slaughter" (FSIS Notice 56-07).

9. FRIGORIFICO PANDO – ONTILCOR S.A. – is under permanent official supervision at all the stages of the process. In force legislation contemplated in the Veterinary Inspection Regulation from the Ministry of Livestock, Agriculture and Fisheries (Ministerio de Ganadería, Agricultura y Pesca - MGAP) is been fulfilled from cattle reception to final products load. Regarding to antibiotics and drug residues, MGAP conducts official controls according to a preestablished time chart. In addition to this rumiant to rumiant feed is forbidden by law.
10. The company has a management system of allergens in which ensures no product contamination with allergens.
In the hazard analysis plan HACCP an evaluation of the likelihood of product contamination with allergens was made and concluded that it is not likely to occur.
11. Frigorifico Pando produces the highest quality without use of food additives and genetically modified foods. Besides the products non are irradiated

FRIGORIFICO PANDO – ONTILCOR S.A. – is committed to producing the highest quality and safest product possible. If you require further information, feel free to contact me.

Yours sincerely,

Dr. Gerardo Mattos Guillén
Quality Assurance Department Manager

January, 2017