



## STATEMENT OF COMPLIANCE (HACCP-PREERQUISITES LETTER)

January 2015

### 1 APPROVALS AND CERTIFICATIONS

Establecimientos Colonia S.A. (E.C.S.A) - Export Establishment N° 2- is approved by the US Food Safety and Inspection Service (FSIS –USDA) to produce for export beef fresh, frozen and cooked frozen beef to United States. 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

In Uruguay is in force the decree MGAP 139/996 (Ministry of Agriculture and Fisheries), since April 1996 which prohibits the feeding of ruminant meat and bone foods derived from ruminants

Est N° 2 in the handling of the SRM (Specific Risk Material) in the Plant is conformed to the Official Uruguayan Rules effective at the moment, in accordance with Federal Register Rules and Regulations (CFR) 310.22. Uruguay is listed at the World Organization of animal Health (OIE) current Resolution, as having negligible Bovine Spongiform Encephalopathy (BSE) risk in accordance with Chapter 2.3.13 of The Terrestrial Code. Therefore, the HACCP plan is in compliance with FSIS NOTICE 56-07 August 31st, 2007, of the SRM final rule.

Since 28 of January of 1997 we complied with the Federal Register , Volume 61, N°144, 25 July 1996 FSIS released the PR/HACCP Rule (also referred to as the MegaRegs). The Pathogen Reduction component mandated a program of bacteriological testing of bovine carcasses for the presence of generic Escherichia coli and for Salmonella spp. bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.

Establishment N° 2 is GSFS (BRC) Issue 6 (July 2011) certified, achieving Grade A, for the following activities: slaughtering process, maturation, quartering, Deboning and vacuum packed or not, storage and dispatch of frozen or chilled bovine meat, with or without bones. Cutting, mixing, forming and freezing of super frozen beef burger..

Establishment N° 2 is ISO 22000:2005 certified, for the following activities: stock reception process for slaughter, slaughtering process, maturation, quartering, Deboning and packing process, storage and dispatch of frozen or chilled, bovine meat, with or without bones. Research, development, packing process, storage and dispatch and processing of meat products super frozen beef burgers.

### 2 HACCP AND PREREQUISITES PROGRAM

HACCP plan and the pre-requisite programs (SSOP and GMP) has been audited by the Ministry of Livestock of Uruguay every year and by USDA/FSIS Authorities , and accepted as satisfactory and was audited by European Union and the inform very satisfactory and by the most of the external Official Sanitary Authorities: U.E, México, Canada, Chile, Russia, Israel, and others.



Establecimientos Colonia S.A.  
Ruta 22 km 30- Tarariras  
Colonia-Uruguay  
Tel.: +(598) 4574 2115  
Fax: +(598) 4574 3319

Ft.com.uy



The Company has in place a fully documented Good Manufacturing Practice- SPS (Sanitation performance standards), Sanitation Standard Operating Procedures (SSOP) and Hazard Analysis Critical Control Point (HACCP) integrated of our quality assurance system:

Complies with Uruguayan Ministry MGAP guidelines for meeting FSIS Pathogen Reduction / HACCP requirements.

The prerequisites includes:

- Documented pest control program designed to prevent pest activity within the plant and its surrounding area, by Licensed Pest Control Operators.
- Implemented written training programs sufficient to ensure that HACCP plans, pre requisites are properly executed.
- There is documented employee hygiene practices program
- Traceability system through DICOSE, required by law to register with his division a DICOSE number, this went into effect since 1977. In 2004, a pilot program started for individual animal identification since birth to slaughter. Uruguay began in September of 2006, the individual identificación.
- We comply with Animal welfare protocol and we have documented program outlining animal handling in compliance with MGAP guidelines, USDA – FSIS Directives 6900.2, 16-08 and 17-08 and CE Directive EU 1099/2009.

The HACCP plan is audited by MGAP supervisors on plant.

It has internal audits (GMP, SSOP, HACCP every year)

The company is audited by most of the customers and external Official sanitary Authorities including:

The good Manufacturing Practices (GMP's), SPS, Sanitation Standard Operating Procedures (SSOP's) and Hazard Analysis Critical Control Point (HACCP) integrated system of quality assurance.

- ✓ The Company compliance with USDA –FSIS prohibitions on SRM.
- ✓ SSOP's implementation, monitoring, corrective action and documentation.
- ✓ Critical limit justification and validation against official a scientific documentation.
- ✓ Critical control monitoring, verification and validation procedures.

The company verifies the HACCP System by:

- ✓ Analytical test and or audit the monitoring procedures.
- ✓ Calibration of the equipment.
- ✓ Sampling of the products.



Establecimientos Colonia S.A.  
Ruta 22 km 30- Tarariras  
Colonia-Uruguay  
Tel.: +(598) 4574 2115  
Fax: +(598) 4574 3319

Ft.com.uy





- ✓ Review the monitoring records.
- ✓ Review the deviations and product dispositions.
- ✓ Sample the environment and other concerns.
- ✓ Its internal audit (GMP, SSOP, HACCP, Quality system) minimum once a year.

### 3 PATHOGEN REDUCTION PROGRAM

In the last 6 years, Salmonella has not been detected in any randomly selected carcass sample tested.

In relation to E. coli O157:H7, establishment 2 confirms that its HACCP Plan has been reassessed in accordance with Federal Register Notice 9 CFR Part 417( Docket N° 00-022N) 7 October 2002 Titled E. coli O157:H7 and according with Notice 65-07 October 2007 for raw ground beef manufacturing trimming: USDA. The HACCP Team of the Company consider E. coli O157: H7 is a hazard reasonably likely to occur in its products without the implementation of a HACCP Plan.

The company uses Neogen's E.coli O157:H7 Confirmation System for the rapid isolation and concentration of E.coliO157:H7 from enriched food or environmental samples with magnetic beads and chromogenic agar plates.

In relation to Shiga toxin-producing Escherichia coli (STEC) (O26,O45 ,O103,O111,O121 and o145) Establishment 2 confirms that its HACCP plan has been reassessed in accordance with Federal Register according with the Federal Register Vol.76 N°226, del 23 of November of I 2011 and according with the MGAP the regulation 3/2012 of april 2; 2012.

Since 2 of January 2015we comply with MGAP/DGSG/DIA/N°233/014. The HACCP Team of the Company considers STEC is a hazard reasonably likely to occur in its products for grinding without the implementation of the HACCP plan.

The STEC are send to external laboratory and the methodology used is BAX PCR –real time bases in USDA MLG for the detection of Shiga toxin- producing Escherichia coli (non O157).

The plan includes the following measures (according with FSIS Directive 6410.1 Verifying Sanitary Dressing and process control procedures in slaughter operations of cattle of any age).

- Animals should arrive with minimum mud and faecal contamination and avoid overcrowding to reduce the possibility of injury or unsanitary conditions.
- Livestock pens capacity is sufficient to hold a single day 'kill.
- Washing of cattle to eliminate contamination on their hides, monitoring, verification, take corrective action if there is deviation (Good manufacturing Practice and SSOP).
- Minimize contamination of the carcass (monitoring and verified by quality Assurance operator).
- Good manufacturing practice and SSOP operations for hide removal (with 2 knives of different colours) (Monitored and verified by quality assurance personal).



Establecimientos Colonia S.A.  
Ruta 22 km 30- Tarariras  
Colonia-Uruguay  
Tel.: +(598) 4574 2115  
Fax: +(598) 4574 3319



- Prior to evisceration, the rectum is secured with a ring and plastic protection to prevent contamination.
- All visible contamination is removed as soon as possible after it occurs to prevent microbial attachment with knife trimming (monitoring, verified, corrective measure and corrective if it is necessary) (Monitored, verified, corrective measure and corrective if it is necessary).
- Measures to control the holding temperature of the carcass after the final wash is the second (CCP 2) ensure that the reduction in microbial effective (carcass temperature is recorded daily and verified by quality assurance personal).
- 180°F (82°C) water knife / equipment sanitizers are utilized.
- Positive airflow is utilized in the kill floor to prevent the circulation of airborne contaminants
- As a part of the HACCP reassessment, the slaughter plan is in compliance with USDA-FSIS Notice 56-07 of the "SRM final rule, about the proper removal, segregation, and disposal of Specified Risk Materials.

The efficacies of these interventions are verified by microbiological testing for E. coli O157: H7.

E.coli O157: H7 using methodologies Official method AOAC 2000.14.

Microbiological testing is used to also verify the effectiveness of interventions and process controls at slaughtering:

Year	N° samples NEGATIVES	N° non aceptables
<b>2008</b>	<b>3520</b>	0
<b>2009</b>	<b>4175</b>	0
<b>2010</b>	<b>2280</b>	0
<b>2011</b>	<b>4055</b>	0
<b>2012</b>	<b>935</b>	0
<b>2013</b>	<b>2215</b>	0
<b>2014</b>	<b>1870</b>	0

Since Jan 2008, considering the new sampling method (n=60 for each lot), tests have been made for E. coli O157:H7 according with it.

Only product that is compliant with HACCP requirements and tested "negative" for E. coli O157:H7 is shipped.



Establecimientos Colonia S.A.  
Ruta 22 km 30- Tarariras  
Colonia-Uruguay  
Tel.: +(598) 4574 2115  
Fax: +(598) 4574 3319





**Since June 1st 2012**, Tacuarembó - Marfrig Group Uruguay confirms that its HACCP Plans have been reassessed According with the MGAP (Uruguayan Ministry of Livestock) new Resolution on June 1st in reference to the new regulation of USDA / FSIS Control Programs for Non- O157 shiga toxin-producing Escherichia coli (Non O157 STEC)

Year	N° samples NEGATIVES	N° non acceptables
2012	12	0
2013	47	0
2014	42	0

**Company Objectives and management:**

Unidad Productiva Colonia – Establecimientos Colonia S.A. Est. N°2 is committed to implement and maintain compliance with the HACCP Plan, Good manufacturing Practices, Standard Operating procedures, quality policies (Quality control assurance) in order to improve the safety and quality of the product.

Sincerely yours,

Ing. Quím. Beatriz Pou  
Gestión de Calidad  
Establecimientos Colonia S.A.  
Quality Manager

Establishment N°2

Uruguay



Establecimientos Colonia S.A.  
Ruta 22 km 30- Tarariras  
Colonia-Uruguay  
Tel.: +(598) 4574 2115  
Fax: +(598) 4574 3319