



E C THROSBY PTY LIMITED

Livestock Buyers & Meat Exporters

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Supply Letter of Guarantee

E C Throsby Pty Ltd Establishment 486

E C Throsby guarantee at the time of shipment that all products are 100% beef and have not been adulterated or misbranded in accordance with guidelines provided by the Department of Agriculture and AUS-meat regulatory standards. ECT ensures that all products meet all importing country requirements defined by the USDA and FSIS.

1. Establishment Registration.

Australian export operations are conducted under the regulatory controls of the Department Of Agriculture. Department of Agriculture 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

Department of Agriculture veterinary officers and meat inspectors have in addition to disease / health control, a fulltime on plant role ,monitoring / auditing company performance in the discharge of their obligations under Department of Agriculture Approved Programs.

Overseas Listing

Establishment 486 is USA listed and operates under a Department of Agriculture Approved Arrangement program to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

2. 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 HACCP plan has been reassessed in accordance with Department of Agriculture Meat Notice 2002/13 and Federal

Register Notice 9 CFR part 417 Docket Number 00-022 N dated 7 October 2002 – *E coli* 0157:H7 Contamination of beef products and Department of Agriculture 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 O157 STEC's being, O26, O111, O45, O103, O121 and O145.

The HACCP reassessment has determined that while 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 Standard 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 HACCP Plan has determined *E coli* 0157:H7 in boneless trim is not likely to occur

The reassessed HACCP Plan reviewed all steps in the process including the following interventions:

- Department of Agriculture ante mortem on all livestock pre-slaughter
- Identification and management of ill or injured livestock
- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export
- Cattle are assessed for cleanliness for slaughter
- Highly trained operators

- After stunning -sealing of weasand by application of a clip/plug to prevent spillage
- Sealing of the bung via bagging to control cross contamination
- Line speeds appropriate to providing adequate time for hygiene inspections and dressing of the carcase
- Sanitising hands and equipment between carcasses for high risk activities
- Knife sterilisation between carcasses
- All carcasses are subjected to a final inspection and hygiene trim
- Zero tolerance is in place for faecal, ingesta and milk spillage
- Chilling and freezing regimes to control microbial growth
- Product hygiene is monitored daily following the Department of Agriculture meat hygiene assessment guidelines
- Documented Corrective and Preventative actions are in place and followed
- Microbial testing of contact surfaces and product

3. Verification *E coli* O157:H7

Sampling

To verify the ongoing effectiveness of these interventions Establishment 486 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 in accordance with Department of Agriculture Meat Notice 2012/03 Escherichia coli O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N=60 Method).

In the past 12 months Establishment 486 has collected 508 samples with 0 positives for *E coli* O157:H7.

Hold and Release

All product is 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* O157:H7 are released for shipment.

Laboratory

Samples are tested by an ISO17025 accredited laboratory to conduct testing of meat products for *E coli* O157:H7 or a Supplier Laboratory which has been assessed and approved by McDonald's third party auditors using the APMEA Supplier Laboratory Audit Checklist for *E coli* O157:H7.

Testing

Screening tests for *E coli* O157:H7 are performed using AOAC 2005.04 GDS MPX top & STEC (STEC includes *E. coli* O157) for *E coli* O157.

Potential positive results are confirmed using M8.10.1 (AOAC 031002)

4. BSE

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

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

SRM is removed in accordance with Federal Register Notice 03-025IF by being fully compliant with the McDonald's BSE Firewalls.

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

Product produced by ECT is Beef only species with no traces of any other non-beef protein or DNA

Yours sincerely



Casey Smith
QA Manager
E C Throsby Pty LTD

E C THROSBY PTY LTD

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15/01/2019

To Whom It May Concern,

Establishment 0486 slaughters and de-bones beef in a continuous process. All meat that is exported to the US is in the form of frozen boxed meat.

Establishment 0486 confirms that its HACCP plan has been reassessed in accordance with US Register Notice 9, CFR Part 417, and Docket Number 00-022N, dated 7 October 2002. This reassessment has determined that E coli 0157:H7 and non-015:H7 STEC is not a hazard that is reasonably likely to occur.

Directly following the HACCP plan is subject to annual reassessment. Directly following the reassessment, The HACCP plan is presented to Department of Agriculture for final approval. The HACCP Plan is subject to independent verification at least on a bi-monthly basis by the Department of Agriculture Area Technical Manager.

There have been no changes to the processing operations at 0486 during the period of the 2012 HACCP reassessment therefore it is determined by the HACCP team that E coli 0157 H7 and non-0157:H7 STEC is not a hazard that is reasonably likely to occur.

PREVENTATIVE MEASURES

Establishment 0486 has a comprehensive food safety system based on a validated HACCP Plan that is reflected in the companies Standard Operating Procedures and Zero Tolerance Management plan.

There are steps identified within the reassessed HACCP plan that are designed to prevent contamination of carcasses from E coli 0157:H7, non-0157:H7 STEC and other pathogens, these steps include:

- Washing of livestock, with potable water prior to slaughter to remove visible contamination such as mud and dung (feed lot cattle are not slaughtered at establishment 0486).
- Oesophageal occlusion during the sticking operation and prior to hoisting.
- Best practice techniques during carcass dressing including freeing and bagging of the bung.
- Standard Operating Procedures (SOP's) such as:
 - Staff Health and Hygiene.
 - Sanitation program including both post-operational and operational sanitation practices.
 - Hot Boning Program
 - Refrigeration Program
- Detailed Work Instructions for all operational tasks performed.
- During processing, the carcass and head and cheek meat are subject to a final inspection and trim, these operations have been nominated as a **critical control points** (as mandated by Department of Agriculture) for the identification and removal of zero tolerances defects.

INTERVENTIONS

Establishment 0486 applies interventions at the following points during production:

1. Final inspection and trim on the slaughter floor – to remove by knife trimming any evidence of contamination by visible fecal material and other macro contamination.
2. Final inspection and trim of head and cheek meat in the offal room - to remove by knife trimming any evidence of contamination by visible fecal material and other macro contamination.
3. At freezing following packing – to achieve log CFU reduction in the population in E coli 0157:H7 and non-0157:H7 STEC through inactivation during the freezing process.

VALIDATION

As part of the HACCP reassessment, results from E.coli 0157:H7 and non-015:H7 STEC sampling that was collected at random throughout production and across all seasons, were reviewed. Since the beginning of operations at E.C.Throsby Pty Limited in the year 2000 there has been no detection of E coli 0157 H7. For the period of 2011-12 E coli 0157 H7 using N=60 sample lots were collected with no positive results detected and for the period of June to September there has been no detection of non-015:H7 STEC since the commencement of testing

This E.coli 0157:H7 statement was reassessed 30 of September 2012. The reassessment procedure included reviewing all HACCP monitoring data relating to the refrigeration critical control points and critical control point for the final trim station on the slaughter floor and head and cheek meat inspection in the offal room. The review of these records shows that the CCP's are in control. The results from E.coli 0157:H7, non-0157:H7 STEC and Salmonella sampling were reviewed.

The efficiency of control for E coli 0157:H7, non-0157:H7 STEC and other pathogens are verified by ongoing microbiological sampling as described in the companies E.coli 0157:H7 and non-0157:H7 STEC Testing Program. The N=60 sampling plan is used for testing for E Coli 0157 H7 and is in accordance with FSIF Notice 62-07: and Department of Agriculture Meat Notice 2012/2.

All product lines that are destined for US grinding Establishments are subject to E coli 0157:H7 sampling:

Sample Selection:

- Frozen meat sample cartons are selected at point of loadout, after consolidation and port marking and before containerization.
- 12 cartons from each lot are selected for sampling. 5 meat samples are drawn from each carton.
- The sample cartons are selected from over a full range of cartons in each lot. If there are different date ranges in the lot, then an effort will be made to select cartons from the different dates.
- If there are over 700 cartons in a container then a second lot must be tested (if the second lot is 12 cartons or less then samples must be drawn from all cartons).

Sample Collection

- Samples are collected by trained Quality Assurance Staff.
- Samples collected are core drill samples.
- A minimum of 5 samples, of approximately 5-10g are selected from a minimum of 12 cartons representing the lot. The total number of pieces sampled per lot must be at least 60 (i.e. N60 method). The total sample weight must be at least 375 g.
- Samples are put directly into a sterile bag.
- Samples are tested on plant in an Department of Agriculture approved laboratory and the testing is performed by trained and competent staff.
 - Testing is performed using the GDS MPEX top seven method.
 - All testing is performed no longer then the following day from sample collection.

Establishment 0486 is a hot boning process, the Company's Hot Boning Program has been developed by the CSIRO and designed with a strict protocol for time temperature requirements that is exercised together with effective freezing and have a 1 to 3 reduction in the growth of microorganisms including pathogens such as E coli 0157:H7 and non-0157:H7 STEC . It has been validated by Food science Australia that the Companies Hot Boning Program can meet these time temperature requirements and has been approved by the Australian Quarantine and Inspection Service. Ongoing validation that the time temperature requirements are met is by the data collected through the placement of at least one data logger into a box of meat during the freezing process.

Establishment 0486 provides a signed declaration stating that E coli 0157:H7 sampling is being performed on all bulk packed meat destined for McDonalds and the US market, this declaration accompanies the export documentation for each respective shipment. Non-0157:H7 STEC are also performed on all product destined for the us

Option 2 declaration as stated in Department of Agriculture Meat Notice 2010/3 is used in the health certificates for meat destined for the US grinding market: *The raw beef components intended for grinding described by this certificate have tested negative for E.coli 0157.H7 and non-0157:H7 STEC in accordance with the Department of Agriculture protocol and represent an entire sampled lot/lots which has been subject to N=60 sampling*

E.C Throsby Pty Ltd is fully committed to reducing micro contamination on meat and producing a safe and wholesome product of the highest quality.

Specified Risk Material (SRM)

All downer cattle or cattle that cannot make its way to the knocking box are deemed as not eligible for the US, they were either slaughtered for the Non US market or destroyed and condemned and sent to the rendering plant. The decision will be made by the on plant veterinarian officer at ante-mortem inspection by passing the animal as fit for US on the grounds that it was unable to make its own way to the knocking box.

SRM's are materials that may harbour and transmit abnormal prions (protein molecules widely believed to be associated with spread of transmissible spongiform encephalopathies – TSE) to humans and other animals.

The following Specified Risk Materials are not collected and the materials are condemned:

For all cattle, tonsils are removed from the head during tongue removal and placed directly into a condemn tub and sent to the by-product for rendering. The small intestine, including the distal ileum are kept in tact on the slaughter floor and delivered to the paunch room, they are not kept and are separated from the rumen and sent to the by-product for rendering. The brain, trigeminal ganglia skull and eyes are left in situ with the head, the head and associated SRM and not kept and sent to the by-product for rendering. The spinal cord and dura is not kept and is removed by trimming on the slaughter floor.

If you require further information please do not hesitate to contact me.

Casey Smith
Quality Assurance Manager
E.C.Throsby Pty Ltd

