



WOODWARD
FOODS AUSTRALIA

Woodward Foods Australia

334C River Road, Swan Hill, Victoria 3585 Australia
PO Box 391, Swan Hill, Victoria 3585 Australia

HAACP LETTER OF GUARANTEE -Without Prejudice

4 April 2019

To Whom It May Concern,

Woodward Foods Australia, source products from **Ashton Pty Ltd, Establishment 2306** that has a Certificate of Registration of an Export Registered Establishment by the Australian Department of Agriculture and Water Resources(DAWR) with a specific listing including Canada and the United States and its Territories.

- **Ashton Pty Ltd, Establishment 2306** is licensed by the Australian Department of Agriculture and Water Resources (DAWR) to process bovine, caprine and ovine animals and further process these products under an Approved Arrangement (Quality Manual).
- **Ashton Pty Ltd** operate under a HACCP (Codex Alimentarius) based program that is re-evaluated on an annual basis and is recognised by FSIS and CFIA.
- **Ashton Pty Ltd** confirms that our HACCP plan has been re-assessed in accordance with **Federal Register Notice 9 CFR Part 417 Docket number 00-0022N dated 7 October 2002.**
- This reassessment has determined that *E. coli* 0157:H7 are reasonably likely to occur on meat products without the effective implementation of a robust HACCP Plan.
- **Ashton Pty Ltd** is committed to the sanitary and hygienic production of products through the process of HACCP. A team consisting of management and suitably qualified persons are responsible for annual HACCP review.
- Our HACCP plan is subject to daily verification by trained Quality Assurance monitors who operate under the guidance of a Manager and who work closely with DAWR.
- **Ashton Pty Ltd** staff and management ensure that a full commitment is made to product being, wholesome, accurately described, traceable, authentic and meeting importing country requirements.

Establishment 2306 operates an *E.coli* 0157:H7 testing program prior to loading for export. The testing program is conducted in accordance with the instruction with the Department of Agriculture and Water Resource's **Microbiological Manual for Sampling and Testing of Export Meat and Meat Products**: Shiga toxinogenic Escherichia coli testing of raw ground beef components intended for export to Canada, the United States of America and its Territories and is designed to test at **N=60**, a randomly sampled "LOT" of cartons not to exceed 700, of product destined for grinding in the US (or territories), generating a sample of 375g per production period.

The reassessed HACCP Plan includes the following interventions which are specifically designed to reduce, eliminate or control *E. coli* 0157:H7 and the **Big 6 STEC**. A Certificate of Analysis is provided for each LOT of RGBG to US and its Territories and Canada. Only products tested **negative** for *E.coli* 0157:H7 are shipped to customer countries requiring *E.coli* 0157 :H7 testing.

The strength of the below interventions is verified through the microbiological testing for the habitation of *E. coli* 0157 H:7 on boneless meat products:



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- Ante-mortem inspection of stock is conducted by a trained Government veterinarian representative from the Department of Agriculture and Water Resources.
- Washing of livestock with potable water prior to slaughter to remove excessive or visible contamination.
- Extensive training of all employees including a target to excel in all Sanitary Standard Operating Procedures including Personal Hygiene, Operational Sanitation, and Pre-Operational Sanitation
- This is done by having an ongoing living document that plans to continually improve on Food Safety Culture.

Good Manufacturing Practices include the following:

- Effective sealing of the bung of the carcasses by covering in a plastic bag and sealing with elastic ring to eliminate bung leak on all carcasses.
- The effective trimming of inadvertent contamination at all tasks along the chain and at CCP points to achieve a zero tolerance of faecal, ingest, or milk contamination.
- This is verified by the stationing of a **CCP 1** (Zero Tolerance of faeces, milk and ingesta) to attain this outcome.
- The additional application of the validated refrigeration step **CCP 2** to ensure the effective refrigeration of products in accordance with **Australian Standard for the Hygienic Production of Meat and Meat products for Human Consumption AS 4696:2007**
- Detailed work instructions for each task that are monitored daily.
- Comprehensive Pre-shipment Review procedure is conducted by a suitably trained HACCP personnel (QAM or trained delegate) to ensure that only products that are compliant with HACCP requirements and are tested negative for *E.coli* 0157:H7 are shipped from the establishment.
- **Ashton Pty Ltd** have developed and implemented Food Safety and Quality Systems that are compliant with the requirements of the **Global Food Safety Initiative** and achieved certification to the current **BRC Global Standards** for Food Safety.
- **Ashton Pty Ltd** has the following programs in place for additional Food Safety Controls:
 - Metal detection in all processing areas
 - Allergen Control program
 - Pre-operational Sanitation monitoring and microbiological monitoring of equipment including personal tools.
 - SRM's are removed on processing floor and effective disposal and containment is maintained of said SRM's and process monitoring is conducted daily.
 - Animal Welfare requirements are maintained and verified through monitoring by company and DAWR.

If you require any further information, please do not hesitate to contact me directly. email:
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Sincerely

Kelly Parkes



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Quality Assurance Manager