



6 January 2023

Letter of Guarantee

**Without Prejudice**

To whom it may concern.

Australian export operations are conducted under the regulatory controls of the Department of Agriculture, Forestry and Fisheries (DAFF). DAFF is the Federal Government Competent and Regulatory 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.

**Midfield Meat International Pty Ltd, Est. 180 has a Certificate of Registration of an Export Registered Establishment** by the Department of Agriculture, Forestry and Fisheries with a specific listing including the United States and operates under Department of Agriculture, Forestry and Fisheries Approved Arrangement programs to produce, as well as other products, raw ground beef components intended for grinding

**Midfield Meat International Pty Ltd, Est. 180** obligations shall be performed in full compliance with the United States Federal Food, Drug, and Cosmetic Act, and all applicable federal and state laws, rules, regulations and guidelines.

**Midfield Meat International Pty Ltd, Est. 180** operates under HACCP system that is recognized by the FSIS.

**Midfield Meat International Pty Ltd** confirms that its HACCP plan has been reassessed in accordance with Federal Register Notice 9 CFR Part 417 Docket Number 00-0022N dated 7 October 2002.

FSIS Notice 05-09 “*Measures to address E.coli O157:H7 at establishments that receive, grind, or otherwise process raw beef products*” and FSIS Directive 10,010.1 are also considered in the construction of this document particularly where both documents observe the relationship between a “supplier” and a “receiver”.

This reassessment has determined that *E. coli* O157:H7 and the Big 6 STEC (O26, O45, O103, O111, O121 and O145) are **reasonably likely to occur** on meat products **without** the effective implementation of the Company **HACCP** plan.

The HACCP plan is at least annually reassessed and is audited and approved by Veterinary Officers of the Australian Department of Agriculture, Forestry and Fisheries. This annual reassessment includes review *E. coli* O157:H7 and non-O157 STEC as defined by FSIS Federal Register Notice [Docket No. FSIS -2010-0023].

The reassessed HACCP plan includes the following interventions which are designed to reduce, eliminate or control *E. coli* O157:H7 and the Big 6 STEC. The efficacies of these interventions are verified by the microbiological testing for the presence of *E. coli* O157:H7 on boneless meat products to wit:-

- The extensive use of Department of Agriculture, Forestry and Fisheries approved Standard Operating Procedures (SOP) and specific-to-task work instructions to ensure reliability and consistency of operator performance.
- Extensive training of all operators using the nationally accredited MINTRAC training process, including a focus on the key elements namely, personal hygiene and sanitation and quality assurance.
- Microbiological control programs for personal hygiene, equipment and contact surfaces.

PO Box 412, Warrnambool, Victoria, Australia 3280  
P: +613 55 634444 E: [midfield.com.au](mailto:midfield.com.au)  
[www.midfield.com.au](http://www.midfield.com.au)

- Ante Mortem inspection of animals by the Australian Department of Agriculture, Forestry and Fisheries Officers.
  - Post-Mortem Inspection of carcasses by the Department of Agriculture, Forestry and Fisheries Environment Authorised Officers.
  - Provision of suspect pens to isolate and maintain separation of suspect animals.
  - Intensive and detailed washing of all bovine animals followed by disinfection of the skin opening regions prior to slaughter by the use of an approved antimicrobial chemical wash on hide opening cutting lines to minimise hide bacteria levels.
  - The occlusion of the oesophagus by using an oesophageal plug and a secondary “Adept” oesophageal clip prior to the hoisting of the carcass to the main rail on adult cattle.
  - The use of a two-knife system and the effective sterilization of knives in the hide flaying process. Extensive use of alcohol-based disinfection of hands, arms and equipment.
  - Effectively sealing of the bung of the carcass by encapsulating in a plastic bag and sealing with an elastrator ring to eliminate bung leak on adult cattle.
  - A hide puller that peels the hide downwards and away from the carcass.
  - The use of a ball tipped brisket saw blade to prevent paunch break during the brisket sawing process on adult cattle.
  - The effective trimming of any inadvertent contamination on carcasses on the slaughter floor to achieve a zero tolerance of fecal, ingesta or milk contamination of carcasses and verified by the deployment of a **CCP 1** (Zero tolerance of faeces, milk and ingesta) to achieve this outcome.
  - The additional application of the validated refrigeration step **CCP 2** to ensure the effective refrigeration of product in accordance with Australian *Standard for the Hygienic Production of Meat and Meat Products for Human Consumption. AS 4696:2007*
  - Exhaustive pre-shipment review procedures are conducted to ensure that only product compliant with HACCP requirements and **tested negative for *E.coli* O157:H7** are shipped from the Establishment.
- Monthly Verification testing by Veterinary Officers of the Australian Department of Agriculture, Forestry and Fisheries for both *E coli* O157:H7 and the Big 6 STEC.

**Midfield Meat International Pty Ltd** have developed and implemented Food Safety and Quality Systems that are compliant with the requirements of the **Global Food Safety Initiative (GFSI)** and achieved certification to the current **BRC Global Standard for Food Safety**

Est. 180 operates an *E. coli* O157:H7-testing program prior to loading for export. The test and hold program is conducted in accordance with the instruction within the Australian Department of Agriculture, Forestry and Fisheries ‘s *Microbiological Manual for Sampling and Testing of Export Meat and Meat Products* 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 results of the testing regime is notified in accordance with the provisions of **FSIS Directive 10,010.1** where a **Certificate of Analysis** (COA) is provided for each Container of product shipped. Monthly independent N60 verification sample testing is conducted by the Department of Agriculture, Forestry and Fisheries using independent 3<sup>rd</sup> Party NATA accredited and Department approved laboratories.

All product destined raw ground beef components are subject to a ‘Test, Hold and Release’ sampling procedure. Only raw ground beef components that are compliant with the HACCP requirements and tested negative for *E. coli* O157:H7 is shipped to the United States of America or territories thereof.

It is therefore considered that due to the reassessment of the HACCP plan in operation at Est. 180 and of the continued effective operation of the said plan detailed in the information provided herein, Midfield Meat International Pty Ltd Est. 180 has concluded that *E.coli* O157:H7 and the Big 6STEC is a hazard **not reasonably likely to occur** in its meat products.

**Midfield Meat International** Pty Ltd has Allergen Control Program approved by the Australian Department of Agriculture, Forestry and Fisheries in place.

**Midfield Meat International Pty Ltd** has Food Security, Defence and TACCP Programs approved by the Australian Department of Agriculture, Forestry and Fisheries in place to prevent bio-terrorism acts in the establishment. Midfield Meat International Pty Ltd is a Known Consignor and Trusted Trader.

A Product Authenticity and VACCP program is also approved by the Australian Department of Agriculture, Forestry and Fisheries with raw suppliers and services undergoing a formal risk assessment. The company participates in a regulatory species testing program.

**Midfield Meat International Pty Ltd** operates a sanitation program approved by the Australian Department of Agriculture, Forestry and Fisheries. Pre-operative Inspection of rooms and equipment are performed daily prior to production commencement and verified by microbiological testing of food contact surface after cleaning.

**Midfield Meat International Pty Ltd** has in place Standard Operating Procedures to ensure the removal from all carcasses of SRM's (Specified Risk Material) prior to leaving the processing floor and the effective containment and disposal of the said SRM's. These programs are monitored daily for effective compliance and are robustly 3<sup>rd</sup> party audited for several North American Brands.

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

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

**Midfield Meat International Pty Ltd** has Recall and Traceability Procedures approved by the Australian Department of Agriculture in place that includes notification to affected customers of any product that may be adulterated or misbranded. The Procedures ensure proper identification for all products coming into, through and leaving the process. All products that are produced can be traced to the first level of distribution and is annually assessed.

In addition to the foregoing, **Midfield Meat International Pty Ltd** is committed to the principles and practices of the company Animal Welfare program that includes, within a number of references, compliance of the "Recommended Animal Handling Guidelines and Audit Guide" published by the American Meat Institute Foundation. Animal Welfare is also 3<sup>rd</sup> Party Audited

**Midfield Meat International Pty Ltd is committed to producing product of the highest safety and quality and that confirms to its HACCP plan.**

Yours sincerely,



Tony G Beadle  
Quality Manager  
**Midfield Meat International Pty Ltd.**

*This document is produced as commercial-in-confidence by MIDFIELD MEAT INTERNATIONAL PTY LTD as a requirement to comply with FSIS Directive 05-09 and Directive 10,010.1.*

*Accordingly, this letter of guarantee can only apply to the uniquely identified "LOT" of cartoned product bearing a discreet shipping mark number that are maintained in that grouping and consigned in total to a registered facility for grinding.*

*It is intended to be provided exclusively to establishments defined as "receiving" MIDFIELD MEAT INTERNATIONAL PTY LTD non-intact beef product intended for grinding where the "receiving" establishment has a "direct relationship" a "more casual relationship" or an "indirect relationship" with MIDFIELD MEAT INTERNATIONAL PTY LTD.*

*Dissemination of this commercial-in-confidence document by any other means than directly from MIDFIELD MEAT INTERNATIONAL PTY LTD or under authorization by MIDFIELD MEAT INTERNATIONAL PTY LTD and includes publishing or broadcasting electronically will represent a breach of the said commercial-in-confidence status and will be prosecutable within the jurisdiction within which the breach is alleged.*

*Please note that cartoned individually wrapped or layer packed chilled or frozen beef primal and sub primal, have not been tested and are not intended for use in ground beef products.*

*MIDFIELD MEAT INTERNATIONAL PTY LTD expects any customers who purchase such products and utilizes these products or any bench trimmings of these products for non-intact processes, to address specific usage within their HACCP plan*