



Hilltop meats Pty Ltd : Establishment 128

2023 HACCP Letter of Guarantee

To Whom it may concern,

Hilltop Meats Pty Ltd (HTM) is registered by the Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) to process, bone, and store bovine meat and meat products for export markets.

HACCP Plan

Hilltop Meats Est. 128 HACCP plan has been audited and approved by the Department of Agriculture, Fisheries and Forestry to develop, implement, maintain and have approved our arrangement to meet food safety and product integrity requirements and facilitate market access. This Approved Arrangement includes implementation of standard operating procedures, work instructions and our HACCP Plan designed to identify food safety hazards including physical, microbiological, chemical, radiological, allergenic, malicious adulteration and quality hazards.

The Approved Arrangements and HACCP Plan scope encompasses the receipt and handling of cattle, to slaughter, boning, processing, chilling and freezing, storage, through to dispatch of meat and meat products for domestic and export markets.

Re-assessment of HACCP is conducted annually with final approval is given by the Department of Agriculture, Fisheries and Forestry.

At Hilltop Meats Pty Ltd Est. 128 re-assessment of our HACCP plan is in line with 9 CFR Part 417 *E. coli* 0157: H7 Contamination of Beef Products, and FSIS Directive 10,010.1

E. coli 0157:H7 is a microbiological hazard likely to occur in the live animal. Due to the effective and continuous implementation of sanitary standard operating procedures, training and monitoring of work instruction, Meat Hygiene Assessment (MHA), *E. coli* 0157:H7 and STEC test surveillance results and current CCP's implementation, this hazard that is not likely to occur on meat and meat products produced at Hilltop Meats Pty Ltd.

Control Measures and Interventions

The re-assessed HACCP Plan includes the following control measures and interventions;

- An assessment of animals is conducted on arrival by the Stockyards people to determine the pre-slaughter condition of livestock prior to being washed. If excessively dirty stock arrive, the Stockyards personnel inform the Main office to carry on feedback to the suppliers, plus the Slaughter Floor Supervisor is notified

to allow processing alterations that may need to be implemented to address dirtier stock entering the processing chain.

- The washing of animals' pre-slaughter with non-potable water as a belly wash and then finishing off washing with a potable water wash before slaughter at a pressure rate acceptable to animal welfare requirements to remove soiled or dirty animals.
- Ante-mortem inspection of all animals conducted by the On Plant Veterinary Officer (Department of Agriculture, Fisheries and Forestry).
- Identification and segregation of all animals that may be ill or are injured, including non-ambulatory livestock. These animals or associated products are not eligible for export.
- Occlusion of the oesophagus after stunning and prior to hoisting.
- Tails are tipped to deter cross contamination.
- Use of a ballpoint blade on a brisket saw.
- Application of a plastic bag and seal of the bung.
- Postmortem inspection by a qualified Meat Inspector who is appointed by the Department of Agriculture, Fisheries and Forestry.
- Individual inspection of each carcass to ensure that no visible defects are remaining.
- Process and product monitoring trend charts are assessed for compliance in the Management Review Meetings.
- All operators are trained with written work instructions. All new employees are trained in personal hygiene and sanitation procedures prior to commencement of employment.
- Processing speeds are controlled to provide adequate time for the hygiene trimming.
- Freezing and chilling of meat and meat product occurs in accordance with the Australian Standards AS 4696 regulatory requirements.

All control measures and interventions are designed to reduce, eliminate or control E. coli 0157: H7 and STEC's.

These control measures are verified by microbiological testing for E. coli 0157:H7 in accordance with STEC testing of Raw Ground Beef Components destined for the US and US Territories.

For the purpose of raw ground beef components destined for grinding in the US for *E. coli* O157:H7, a lot is defined as comprising frozen cartons of beef components not exceeding 700 cartons contained within any single shipping container of raw ground beef components destined for the US.

Establishment 0128 operates a hot boning process. HTM use product temperature control procedures developed by the CSIRO and designed with a strict protocol for time temperature requirements. Exercised together with effective freezing, there is a 1-3 reduction in growth of micro-organisms.

It has been validated by Food Science Australia that the company's Hot Boning Program can meet these time temperature requirements and has been approved by the Department of Agriculture, Fisheries and Forestry. Ongoing validation of the time temperature requirements are met by data collected through the placement of data loggers into cartons of product during the freezing process and daily process monitoring reporting by the Quality Assurance Officers at the establishment. The QAM receives Refrigeration Index records through the iLeader automated notification system.

Specified Risk Materials

Specified Risk Material: SRM's are defined as being tonsils and small intestine from all cattle and from cattle 30 months or older, the head (skull, eyes, brain and trigeminal ganglia), the vertebral column (spinal cord and dura) and dorsal root ganglia. The removal and prevention of contamination relating to these materials are controlled with documented procedures and verified by both internal and external monitoring and audits.

All downer cattle or cattle that cannot make its way to the knocking box are deemed as not eligible to the US. They are either slaughtered for a non-US market or destroyed and condemned and sent to the rendering plant. The disposition of all cattle is provided by the On-Plant Veterinarian DAFF.

The following is a list of intervention steps introduced to prevent contamination of carcasses during processing from *E. coli* O157:H7 and non O157 STEC.

Livestock Receiving and Handling

- Cattle ante mortem inspection occurs prior to slaughter by an authorised DAFF officer
- Lairages are kept clean, pens hosed out between individual lots and race ways hosed as necessary to remove zero tolerance contamination.
- Cattle are handled quietly and humanly prior to and during lairage to avoid stress.
- Cattle are washed prior to slaughter to ensure hides have a minimal of zero tolerance contamination when presented for slaughter. In addition, cattle receive a final potable body wash to dampen hair to avoid fall out from hide during processing.

- The National Livestock Identification Scheme (NLIS) database allows identification and traceability assurance.
- A Quality Assurance Officer and Supervisors monitor procedures from cattle receipt to stunning with guidance by written instruction through the HTM Animal Welfare Procedures Manual and associated work instruction.

Slaughter Floor Operations

- The daily workforce levels, training and initial induction training for new employees is controlled by the HTM Training Program with training being monitored, reviewed, and recorded.
- All dressing procedures are preceded by operator washing hands with soap and water and sterilising knives and equipment in 82°C water.
- Operators are trained using work instructions designed to eliminate contamination of carcasses.
- The hide is removed avoiding contact with the dressed carcass.
- Carcasses contaminated during evisceration are tagged and trimmed on the retain rail to remove visible zero tolerance contamination.
- Carcasses and carcass parts are inspected by an authorised DAFF officer.
- All head meat is inspected to ensure no visible zero tolerance remains on the head meat prior to entry to the offal room.
- All carcasses are inspected and trimmed to ensure no visible zero tolerance remains on the carcass prior to leaving the slaughter floor.
- A Quality Assurance Officer and Supervisor monitors all slaughter floor and offal room procedures and product, from slaughter floor to carcass chilling or hot boning.

Halal program

- The objective is to ensure that product is slaughtered according to the religious rites with due regard to animal welfare, and once slaughtered is maintained separate to product that is not Halal.
- Procedures should comply with the Australian Government Authorised Halal Program and address:
 - Humane stunning and slaughter: for guidance see the National Animal Welfare Standards for Livestock Processing Establishments Preparing Meat for Human Consumption available from the Australian Meat Industry Council (AMIC) website
 - Identification of the Approved Islamic Organisation (AIO)
 - Provision of registered Muslim slaughtermen
 - Identification and segregation of Halal and non-Halal products
 - Monitoring of the slaughter process and segregation throughout the whole production process.
 - Corrective action to be taken when elements of the program are not followed
- Ordering, security, daily control (signed log-in/out) and reconciliation of the 'Halal' stamp (metal, rubber, computerised and/or pre-printed). The same controls apply to the official Halal stamp as apply to other departmental Official Marks. The Halal mark is not required to be defaced if the product is sent to the Australian domestic market

- Halal Certificates - ordering, security, issuing and reconciliation of the 'Halal' certificate only by an Authorised Signatory of the establishment.

Boning Operations

- Boning room temperature is maintained at or below 10°C
- Product is under active refrigeration within 2 hours from stunning
- Chilled product is reduced to ≤ 5°C within 24 hours of boning from stunning.
- Chilled product is stored at or below 3°C
- Frozen product is stored at or below -18°C

List of Critical Control Points within the HACCP Plan

CCP 1	Beef Slaughter Floor Hygiene Trim including retain rail	No visible contamination with faecal material, ingesta, or milk (zero tolerance) on the surface of any carcase after leaving the hygiene trim or retain rail on the slaughter floor
CCP 2	Offal Trimming	No visible contamination with faecal material, ingesta, or milk (zero tolerance) on the surface of head meat, tongues, cheek meat and weasand meat.
CCP 3	Freezing Bone-In and Boneless beef. Freezing of offal. (Plate Freezing)	Bone-In, Boneless and offal is to achieve a temperature of <5°C within 24 hours from time of stunning.
CCP 4	Carcase Chilling	Carcases are to achieve a surface temperature of <7°C within 24 hours from time of stunning.
CCP 5	Carton Blast chilling	Boneless and Bone-in beef cartons are to achieve a temperature of <5°C within 24 hours from time of stunning.
CCP 6	Cryogenic Rapid Chill Tunnel chilling	Bulk bin is to achieve a temperature of <5°C within 24 hours from time of stunning.

Approved Arrangement – Supporting Documents

- Preoperational sanitation
- Cleaning and Sanitation
- Personal Hygiene
- Waste Control
- Water Supply
- Pest Control
- Structure and Maintenance
- Control of Hazardous substances
- Sourcing animals for slaughter
- Purchasing
- Animal Welfare
- HALAL Slaughter
- Boning
- Temperature Control
- Calibration
- Sampling
- Control of SRM
- Meat Hygiene Assessment
- Foreign Object Control
- Product Traceability and Recall
- Export Security and Integrity
- Control of Official Marks
- Management Review
- Internal Audits
- Corrective action and control of non-conforming product
- Training

A review of records relating to HACCP and supporting programs is conducted daily to confirm that only product that has tested negative for *E.coli* O157:H7 and non O157:H7 STEC, and is compliant with our HACCP program is shipped to the U.S.A.

Hilltop Meats is committed to producing safe, legal, integrous, authentic and wholesome product through adherence to all elements of its HACCP based Food Safety Program and compliance to our importing customer country requirements.

Sincerely,

Daniel Gibbon

A handwritten signature in blue ink that reads "Daniel Gibbon".

Quality Assurance Manager
Hilltop Meats Pty Ltd

05/01/2023