

January, 2023

US Supply Letter of Guarantee

**Nolan Meats Pty Ltd
Establishment 80**



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1. Establishment Registration.

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

DAFF 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 DAFF Approved Programs.

Overseas Listing

Establishment 80 is USA listed and operates under a DAFF 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 (STEC).

HACCP Reassessment

The HACCP plan has been reassessed in accordance with 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 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 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/STEC's in boneless trim is:

Not Likely to occur ✓

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

- DAFF 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



- DAFF trained operators
- After stunning -sealing of weasand by application of a clip 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 carcases for high risk activities
- Knife sterilisation between carcases
- All carcases 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 80 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 in accordance with Microbiological Manual for Sampling and Testing of Export Meat and Meat Products Escherichia coli O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N=60 Method).

From 1st January 2022 to 31st December 2022 Establishment 80 has collected 88 samples with 0 detection of *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 Nata accredited laboratory to conduct testing of meat products for *E coli* O157:H7 or a Supplier Laboratory which has been assessed and approved DAFF

Testing

Screening tests for *E coli* O157:H7 are performed using (BAX) M8.10.1- AOAC031002 for *E coli* O157.

Potential positive results are confirmed using (IMS) M8.10.2- MLG 5.08

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

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

Yours sincerely



Mark Lewis
Food Safety Coordinator
4th January 2023