



January 2025

THOMAS BORTHWICK & SONS (Australia) PTY LTD

A.B.N. 12 006 525 104

US Supply Letter of Guarantee

**Thomas Borthwick & Sons (Australia) Pty Ltd
Establishment 67**

1. Establishment Registration.

Australian export operations are conducted under the regulatory controls of the Australian Government Department of Agriculture, Fisheries and Forestry. The Department of Agriculture, Fisheries and Forestry 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, Fisheries and Forestry 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, Fisheries and Forestry Approved Programs.

Overseas Listing

Establishment 67 is USA listed and operates under a Department of Agriculture, Fisheries and Forestry 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 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 MM 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 0157 STEC's being, 026, 0111, 045, 0103, 0121 and 0145.

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 Eco/i0157:H7 in boneless trim is:

Likely to occur

OR

Not likely to occur ✓

(Please tick).

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
- Department of Agriculture 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 67 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 in accordance with the Australian Government Department of Agriculture, Fisheries and Forestry. Microbiological Manual for Sampling and Testing of Export Meat and Meat Products. Section 8. Microbiological Testing to satisfy Specific Market Requirements. i.e. *Escherichia coli* O157:H7 testing for raw ground beef components destined for export to the US and US Territories (N=60 Method).

In the past 12 months Establishment 67 has collected samples for 222 tests with 2 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 is 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 031002 for *E coli* O157:H7. Potential positive results are confirmed using MLG 5.09.

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.

Yours sincerely

Signature



Scott Crow
Quality Assurance Manager
Thomas Borthwick & Sons (Australia) Pty Ltd