



10 January 2025

US Supply Letter of Guarantee

Stanbroke Beef Pty. Ltd.
Establishment 203

1. Establishment Registration.

Australian export operations are conducted under the regulatory controls of the "Competent Authority". This 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

Veterinary officers and meat inspectors of the Competent Authority have in addition to disease / health control, a fulltime on plant role, monitoring / auditing company performance in the discharge of their obligations under Government Approved Programs.

Overseas Listing

Establishment 203 is USA listed and operates under a Competent Authority 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 the requirements of *the Competent Authority* and MICOR: "Importing Country Requirements HACCP – USA" as applicable to the exported product. The HACCP Review was conducted 09 to 16 September 2024.

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.

On completion of this review and in consideration of changes made to process controls, and in conjunction with existing controls as listed below, combined with the assessment of verification and validation data, Stanbroke Beef affirm the following Critical Control Points (CCP 1 Carcase Trimming, CCP 2 Offal Trimming, CCP 3A-E Chilling) and consider that their HACCP Plan and Sanitary Standard Operating Procedures are adequate to control STECs (*E.coli* 0157:H7, O103, O111, O121, O145, O26, O45) and that under the HACCP Plan they are not reasonably likely to occur on carcasses or in the meat produced at this establishment.

The HACCP Plan has determined *E coli* 0157:H7 in boneless trim is:

Likely to occur ☐

OR

Not reasonably likely to occur ☒

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 carcass
- 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* 0157:H7 "as well as monthly TOP 7 STEC Verification testing by the Australian Government DAFF"

Sampling

To verify the ongoing effectiveness of these interventions Establishment 203 conducts sampling and testing of Beef Trimmings for *E coli* 0157:H7 "as well as monthly TOP 7 STEC Verification testing by the Australian Government DAFF in accordance with Microbiological Manual for Sampling and Testing of Export Meat and Meat Product.

Since the previous HACCP Review completed 16 September 2024, Establishment 203 has collected samples for 429 tests which includes monthly TOP 7 STEC Verification testing by the Australian Government DAFF (with 1 positive tests for *E coli* 0157:H7 = 0.233%).

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* 0157:H7 "as well as monthly TOP 7 STEC Verification testing by the Australian Government DAFF is released for shipment.

Laboratory

Samples are tested by an ISO17025 accredited NATA laboratory to conduct testing of meat products for *E coli* 0157:H7 "as well as monthly TOP 7 STEC Verification testing by the Australian Government DAFF (including *E.coli* 0157: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* 0157:H7 and TOP 7 STEC (*E.coli* 0157:H7, O103, O111, O121, O145, O26, O45).

Testing

Screening tests for *E coli* 0157:H7 are performed using BAX RT or GDS for *E coli* 0157:H7. Potential positive results are confirmed using BAX. "as well as monthly TOP 7 STEC Verification testing by the Australian Government DAFF.

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



Juliano Barbosa
Quality Assurance manager