



13th January 2010

CARGILL BEEF AUSTRALIA 2010 HACCP Reassessment and Manufacturers Declaration

Cargill Beef Australia, Establishment 249 Tamworth and Establishment 291 Wagga Wagga confirm that there is an Integrated Management System in place including Standard Operating Procedures, work Instructions and a HACCP Plan that are designed to identify food safety hazards including Physical, Biological, Chemical and quality food safety hazards.

The Integrated Management System and HACCP Plans cover the receipt and handling of cattle, and the slaughtering, boning, processing and packing of beef including the dispatch of meat and meat products for the domestic and export markets. The Integrated Management System also includes the Rendering of by-products for the domestic and export markets.

All material processed in the Slaughter Floor, Offal and Boning Rooms is collected only from animals sourced within Australia that pass both ante-mortem and post-mortem veterinary inspection at the time of slaughter and are found to be fit for human consumption. All cattle must be accompanied with a national Vendor Declaration or equivalent and must be fitted with a National Livestock Identification device.

Livestock are handled according to The Model Code of Practice for the Welfare of Animals at Livestock Slaughtering at Establishments.

Cattle are slaughtered, dressed and processed following the Australian Standard AS4696 Australian standard for the Hygienic Production and Transportation of Meat and Meat products for Human Consumption and the AQIS Approved Arrangement Guidelines.

Carcasses are aged according to the AusMeat dentition requirements and assessed following AusMeat carcass assessment criteria. After carcasses are boned, sliced and packaged on-site and labeled according to AusMeat language beef categories identifying the product type.

Cargill Beef Australia confirms that the HACCP Plan is reassessed annually by the HACCP Team including representatives from Establishment 249 Tamworth and Establishment 291 Wagga Wagga in accordance with US federal registrar notice 9 CFR part 147-docket number 00-022N dated 7th October 2002.

The reassessed HACCP Plan includes the following interventions to reduce, eliminate or control E. coli O157:H7:

- Steam Vacuum
- Certified Trimmers Programs
- Chilling of Carcasses

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To verify the ongoing effectiveness of these interventions Cargill Beef Australia conducts sampling and testing of Beef Trimmings and Offals for *E. coli* O157:H7 as per the AQIS Meat Notice 2008/05 Escherichia coli O157:H7 testing of raw ground beef components destined for export to the US and US Territories (N60 Method). This program includes the sampling of trim and offals throughout the entire production times ensuring representative samples are taken from each production time zones. At Cargill Beef Australia 12 cartons in every 700 cartons of product produced and 12 pallets in every 19 pallets of product produced for further processing are tested on a lot basis. 375g from each lot sample is then tested for *E. coli* O157:H7 using AQIS approved methods to test for *E. coli* O157:H7.

All product is subject to a 'Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and has been sampled and tested with negative results for *E. coli* O157:H7 can be released for shipment to the United States.

Our laboratory procedures require us to participate in external proficiency testing for *E. coli* O157:H7. This proficiency testing is conducted with IFM Quality Services Pty Ltd on a monthly basis.

Due to Cargill Beef Australia's reassessment of their HACCP Plan and it's continued effective operations the HACCP team has concluded that *E. coli* O157:H7 is not a risk in any product leaving the establishment.

Although the World Organisation for Animal Health has declared Australia as having a negligible risk of BSE (Bovine Spongiform Encephalopathy) as per the Terrestrial Animal Health Code the HACCP reassessment of Cargill Beef Australia's HACCP Team has identified all SRMs including Spinal Cord and Durra as a potential microbiological hazard and therefore have identified SRMs as a Zero Tolerance with specific positions and Work Instructions in place dedicated to the removal of SRMs. Cargill Beef Australia's SRM Control Program is fully integrated into the Integrated Management System and HACCP Plans.

Cargill Beef Australia have defined Specified Risk Materials (SRMs) as the brain, skull, eyes, trigeminal ganglia, spinal cord, dura, vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), and dorsal root ganglia (DRG) of cattle 30 months of age and older, and the Spinal cord, dura, tonsils and the distal ileum of the small intestine of all cattle.

SRMs are controlled as part of the Cargill Beef Australia's Integrated Management System. No brain, skull, eyes or distal ileum are harvested for human consumption and are disposed of by rendering. Cargill Beef Australia does not process any downer animals for the export market.

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The reassessment of Cargill Beef Australia's HACCP Plan identified animal receipt, handling and welfare as potential quality and chemical hazards. The HACCP Plan in place for this area has control measures in place to ensure all animals processed at this establishment are in compliance with the National Vendor Declaration System guidelines including withholding periods and export slaughter intervals. These national guidelines comply with the FDA and USDA requirements.

In addition the reassessment of Cargill Beef Australia's HACCP Plan has ensured that all hazards both physical, chemical, biological quality, have steps in place to eliminate or control the identified hazards through policies, procedures, work instructions and subsequent monitoring and verification steps.

Cargill Beef Australia's Integrated Management System and HACCP Plan have been audited and approved by the Australian Quarantine Inspection Service against the AQIS Approved Arrangement Guidelines and is accredited against the ISO standards 22000:2005 for Food Safety Management Systems.

Cargill Beef Australia has training programs in place including product specifications and work instructions to ensure only trained operators operate in each processing step throughout the facility. This is monitored through both daily, monthly and annual audits as well as third party assessments.

The requirements and procedures outlined in this declaration are monitored and verified internally through in-house inspection and auditing as well as through external audits.

Cargill beef Australia is committed to producing the highest quality, food safe product possible. To this extent Cargill Beef Australia has gained certification for their HACCP Plan under the international ISO 22000:2005 Standard for Food Safety Management Systems. If you require any further information in regards to Cargill Beef Australia, it's product or processes, please contact me directly on +61 267 646 700 or +61 4 2930 2240

Yours Faithfully,

Des Copeland
Lead Technical Services Manager
HACCP Food Safety Coordinator
Cargill Beef Australia

14/1/2010
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