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E.COLI 0157:H7 STATEMENT

To whom it may concern,

This consignment was processed in compliance with specific HACCP plans, Est 612 confirms that it has system controls, including Standard Operating Procedures and its HACCP system, that are designed to control microbiological hazards (for example E.coli 0157:H7).

Est 612 re-assessed its HACCP plan in January 2010 in line with 9 CFR Part 417 (Docket no. -002) E.coli 0157:H7 Contamination of Beef Products, and FSIS Directive 10,010.1 and due to the continuous and effective operation of the sanitary Standard Operating Procedures, Work Instructions, Meat Hygiene Assessment, current CCP, Corrective Action SOP and Pre-shipment Review then E.coli 0157:H7 is considered to be a hazard that is not likely to reasonably occur on the carcass or in the meat.

The reassessment of Establishment 612 HACCP plan has been audited and approved by the Australian Quarantine Inspection Service (AQIS)

Evidence to support the above conclusion:

Norvic HACCP Team recognises that 0157:H7 is a potential microbiological hazard associated with live cattle. Our process was then examined for procedures that we have in place to control the hazard to ensure it is not reasonably likely to occur on the carcass or in the meat.

- ESAM results show that there were four detections of E.coli on Beef in the past twelve months. This is 2.92% detection rate and well within the acceptable 20% allowable under ESAM.
- Carton Meat Assessment records show no detections of zero tolerance over the year with approximately 37 cartons being checked daily. Also no USA rejections for beef have been recorded since Norvic commenced operations in 1997.
- Burger King requires testing for E.coli 0157:H7 and since commencing testing in August 1998. 242 tests I 2009 consisting of 12 samples per test (since Nov 07 in line with new US requirements) have been conducted with no positives detected.

The principal controls of pathogenic organisms such as E.coli and Salmonella at Norvic are Trimming and Refrigeration. All visible contamination is trimmed as soon as it is detected and able to be removed. Invisible contamination is controlled by reducing the environmental temperature of the organisms to 7°C (Refrigeration) or less.

The time/temperature parameters set as the Critical Limits for the processing of the range of Norvic products reflect this.

While refrigeration remains the Critical Step in the control of most of the pathogenic bacteria we are concerned with, we have added the Final Trim on the kill floor as a Critical Step in the control of Visible contamination with the "Zero Tolerance" items.

The final trim on smallstock is done before the final wash and before the scales on the beef. Only qualified appropriately trained Quality Control operators are assigned to these operations to remove all visible contamination

These will be monitored through the MHA Program and the response to ANY detection of these will be as mandated in the program i.e. checking of product back to the last clear check, increase monitoring, investigation of cause, notification of operators and supervisors in downstream areas.

This effectively makes the "Critical Limit" for these items 0.

Est 612 has a NATA registered laboratory on site. A pre-sumptive test for E.coli 0157:H7 is performed daily as part of its HACCP verification, which also indicates the hazard is not likely to occur. The pre-shipment review form is used to ensure all requirements have been met before exporting to the USA.

The management of Est 612 is committed to producing the highest quality, food safe product possible.

N J Hensel

QA Manager

Norvic Food Processing