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Ralphs Meat Company Pty Ltd
Establishment No:260
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10/06/2010

Statement of Compliance

1. Ralphs Meat Company Establishment 260 is approved by the US Food Safety and Inspection Service (FSIS) to produce for export of bovine and bovine offal.
2. In the Federal Register, Vol. 61, No. 144, 25 July 1996 FSIS released the PR/HACCP Rule. The pathogen Reduction (PR) component mandated a program of bacteriological testing of bovine carcasses for the presence of Escherichia coli and Salmonella spp bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant HACCP program.
3. The Company has in place a fully documented HACCP-based quality assurance Approved Arrangement which has been established by the Australian Government's Australian Quarantine & Inspection Service (AQIS) and has been assessed and approved by AQIS.

The Approved Arrangement:

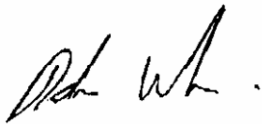
- complies with AQIS guidelines for meeting FSIS Pathogen Reduction/HACCP requirements;
 - is audited by on-plant AQIS Supervisor;
 - audited at least each month by external AQIS officers;
 - has been subjected to a detailed verification audits by external AQIS auditors and found to meet AQIS and FSIS requirements; and
 - was most recently audited by FSIS officers in 17 August 2006 and the plant facilities and processing procedures was found to be accepted.
4. BSE Firewall standard Operating Procedures have been added to the Approved Arrangement that provided clear work instruction to eliminate the presence of SRM material from the human food chain. The program provides clear and concise instructions as to the handling and exclusion of SRM material from the processing of meat and offal's as determined by the AQIS Meat Notice 2004/04 and FSIS Interim Final Ruling Notice 9-04. These procedures have been audited by AQIS and 3rd party Commercial auditors and found to be compliant with the AQIS/FSIS regulations.

5. In relation to E.coli 0157:H7, establishment 260 confirms that its HACCP Plan is re-assessed annually in accordance with 'Federal Register Notice 9 CFR Part 417 Docket Number 00-022N dated 7 October 2002 and titled E. coli 0157:H7 Contamination of Beef Products'.
6. Establishment 260 HACCP plan has 2 CCP in place that reduced E. coli 0157:H7 to undetectable levels. The 1st CCP is on the Slaughter floor after the final carcass hygiene trim where the critical limit is: No clearly visible faecal, ingesta, milk or urine contamination to be detectable on the carcass after the hygiene trimming is completed. The 2nd CCP has been identified as carcass chilling where the reduction in surface temperature is reduced to $\leq 7^{\circ}\text{C}$ within 24hrs, not at 24 hours of stunning and there after maintaining surface temperature of no warmer than $\leq 10^{\circ}\text{C}$ on all surfaces of the carcass so as to achieve refrigeration index (RI) criteria:
 - Average of RI ≤ 1.5 ,
 - 80% of RI's ≤ 2 ,
 - maximum RI + 2.5.
7. The reassessment HACCP Plan includes interventions and other measures of prevention or corrective actions as recommended by the FSIS.
 - washing of cattle with heavy hide faecal contamination (verified by inspection of hide-on carcasses by Quality Assurance Monitoring;
 - occlusion of the oesophagus after stunning and/or bleeding (verified by observation by Quality Assurance Monitoring of nominated Operatives carrying out their work procedures;
 - identification, using tags, of carcasses where faecal/ingesta leakage is suspected or occurs during dressing procedures (verified by observation by Quality Assurance Monitoring of operators carrying out their work procedures;
 - tagged carcasses subjected to intensified inspection and, when necessary, intensified trim and operational sanitation procedures prior to chilling (verified by Quality Assurance Monitoring of trimmers carrying out their work procedures;
 - carcass surface are rapidly dry chilled to $\leq 7^{\circ}\text{C}$ within 24hrs prior to boning. Further cooling (chilling or freezing) of boned meat does not exceed the time/temperature requirements of the Australian Standard AS:4696 2002;
8. The efficiency of those interventions is verified by microbiological testing of boned meat product for the presence of E.coli 0157:H7 using the N=60 protocol stated in AQIS Meat Notice 2007/17 testing of raw ground beef components destined for grinding in the USA.

9. The test method used for screening E.coli 0157:H7 is by the BAX Q7 using the MP Express kit, undertaken at an AQIS Approved Laboratory. The sampled lots will be held and controlled by the company until the test for the lot has been obtained and is negative E.coli 0157:H7. If E.coli 0157:H7 is confirmed as being present in the lot, the affected trim product will NOT be released to commerce trade and the disposition of the product will be determined by AQIS.
10. Following the reassessment of Establishment 260 HACCP Plan and its continued effective operation, as detailed above, Establishment 260 has concluded that the prevalence of E.coli 0157:H7 has been reduced to undetectable levels.

Ralphs Meat Company is committed to producing the highest quality and safest product possible. If you require further information please feel free to contact me.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Adam Wilson', with a small dot at the end.

Adam Wilson
QA Department
Ralphs Meat Company Pty Ltd.