



January, 2022

HW Greenham & Sons Pty Ltd - Establishment Number 234

Letter of Guarantee

Establishment Registration

Australian export operations are conducted under the regulatory controls of the Australian Department Of Agriculture. The Department of Agriculture 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 veterinary officers have in addition to disease / health control, a full time on plant role, monitoring & auditing company performance in the discharge of their obligations under Department of Agriculture Approved Programs.

Overseas Listing

Establishment 234 is eligible to export to numerous overseas countries including the USA and Canada and operates under a Department of Agriculture Approved Arrangement (AA) program to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

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 O157:H7 Contamination of beef products and Department of Agriculture MAA 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 O157 STEC's O26, O111, O45, O103, O121 and O145.

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 reassessed HACCP Plan reviewed all steps in the process including the following interventions:

- Livestock washing prior to slaughter and ante-mortem inspection by a Department Veterinary Officer prior to slaughter
- Application of Chlorine Dioxide (Twin Oxide) to hide at opening lines prior to dressing (no contact with product)
- Occlusion of the oesophagus during the slaughtering process
- The use of a plastic bag and elastrator ring for tying and sealing the bung
- The use of a ball point blade to prevent possible contamination when sawing the brisket

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- Sanitising hands and equipment between carcasses for high risk activities
- Trimming of all external selvage areas of carcasses
- CCP on the slaughter floor for hygiene trimming operations
- Meat Hygiene Assessment of product and process monitoring against written work instructions
- CCP for Chilling and Freezing of product to control microbial growth

Verification *E coli* O157:H7 & Non O157

Sampling

To verify the ongoing effectiveness of these interventions Establishment 234 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 and Non O157 in accordance with the Department of Agriculture Microbiological Manual for Sampling and Testing of Export Meat and Meat Product.

H W Greenham and Sons Est 234 has had an *E. coli* O157 H7 & STEC testing program in place since 2002 and to the end of 2021 a total of 36,983 samples have been tested with 44 positives, giving a prevalence rate of 0.11%. In the calendar year 2021 a total of 557 samples have been tested with 0 positives, giving a prevalence rate of 0.00%

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 & Non O157 is released to the market.

Laboratory

Samples are tested by an ISO17025 accredited laboratory to conduct testing of meat products for *E coli* O157:H7 & Non O157.

Testing

Screening tests for *E coli* O157:H7 are performed using Assurance GDS® MPX Top 7 STEC for *E coli* O157.

Potential positive results are confirmed using MLG 5B.02, MLG 5.05.

BSE

Australian legislation prohibits the feeding of all Restricted Animal Materials to all ruminants, including cattle.

All beef products destined for the USA and Canada are free from Specified Risk Materials (SRM).

SRM is removed in accordance with Federal Register Notice 03-0251F.

Product from all non-ambulatory, disabled or downer cattle is excluded from export.

Yours sincerely

For and on behalf of HW Greenham & Sons Pty Ltd



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