

January 2024

HW Greenham & Sons Pty Ltd

Establishment Number 234

Letter of Guarantee

Establishment Registration

Australian export operations are conducted under the regulatory controls of the Department of Agriculture, Fisheries and Forestry (DAFF). DAFF is the Federal Government authority responsible for Food Safety, Overseas Country Requirements and Australian Export Standards, ensuring that exported /supplied product is fully compliant with Foreign and Australian government requirements.

Health Controls

DAFF 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 DAFF 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.

Third Party Food Safety Certification

Establishment 234 has BRCGS certification (GFSI certification standard) and is audited annually for compliance.

HACCP Plan

The Approved Arrangement program incorporates a HACCP plan which addresses potential food safety hazards and control measures are in place to eliminate or minimize these hazards.

The HACCP plan contains CCP's which directly address the hazards of Shiga toxin-producing Escherichia coli (O157, O26, O111, O45, O103, O121 and O145) and salmonella.

The annual HACCP reassessment has determined that while STECS and salmonella may be potential hazards from cattle it has been concluded that due to the effective implementation of the HACCP plan and Sanitary Standard Operating Procedures the hazards have been effectively controlled resulting in them not being reasonably likely to occur on product.

The reassessed HACCP Plan reviewed all steps in the process including the following control measures:

- DAFF ante mortem inspection on all livestock pre-slaughter.
- Identification and management of ill/injured livestock. Non-ambulatory cattle segregated and humanely slaughtered.
- Cattle assessment for cleanliness for slaughter.
- Use of highly trained operators.
- Application of Chlorine Dioxide (Twin Oxide) to hide at opening lines prior to dressing (no contact with product).
- 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.
- Washing hands and sanitising equipment between carcasses for high-risk activities.
- Knife sterilisation between carcasses.
- All carcasses subjected to final inspection and hygiene trim.
- Zero tolerance controls are in place for managing contamination from faeces, ingesta and milk spillage.
- Carcass hot water wash pre chilling.
- Carcass and finished product quality inspections.
- Chilling and freezing regimes to control microbial growth.
- Product hygiene monitored daily following the DAFF meat hygiene assessment guidelines.
- Documented Corrective and Preventative actions.
- Microbial testing of contact surfaces and product.

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VACCP – Food Fraud/Adulteration Vulnerability Assessment

Raw materials and services are categorised based on the potential risk they may pose to Greenham Australia business.

Suppliers and their products/services undergo a formal risk assessment considering food safety, quality, and legality prior to being approved. Supplier performance and product compliance is reviewed annually or sooner if information becomes available which may trigger an immediate review.

TACCP – Supply Chain Security and Threat Assessment

Greenham Australia believes that maintaining the security of its supply chain underpins the integrity of its products and is a critical aspect of the business both now and into the future. Accreditation in the Authorised Economic Operator Trusted Trader program and Known Consignor Scheme is seen as an essential component of supply chain security.

TACCP methodology has been used to assess security hazards and risks to the business, process, and product.

STEC Testing

Sampling and results

To verify the ongoing effectiveness of control measures, Establishment 234 conducts sampling and testing of products destined for grinding for STECs in accordance with DAFF Microbiological Manual for Sampling and Testing of Export Meat and Meat Products.

In the calendar year 2023 Establishment 234 tested 652 samples with 5 confirmed positive results.

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 are released for shipment.

Laboratory

Samples are tested by an ISO17025 accredited laboratory approved to conduct testing of meat products.

Testing

Screening tests are performed using AOAC 031002 BAX Real Time PCR for E. coli O157:H7 and AOAC 091301 BAX Real Time PCR for detection of selected STEC in beef trim or AOAC 071301 Biocontrol GDS MPX Top 7 STEC and AOAC 101502 GDS MPX ID Top 6 STEC.

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

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.

Residue Testing

The National Residue Survey (NRS) is managed by DAFF who monitor residues in animal products through testing programs to satisfy Australian Export Certification and Importing Country Requirements.

Yours Sincerely

For and on Behalf of Greenham Australia Pty Ltd



Alistair Baker BSc (HONS)

Group Quality Assurance Manager