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30th October 2007

Reassessment of the Lean Meats Oamaru (ME137) HACCP plan to determine the likelihood of E.coli O157:H7 being a hazard.

The HACCP plan for beef produced at Lean Meats Oamaru Limited (ME 137) has been reassessed to determine whether or not E.coli O157:H7 is a hazard that is reasonably likely to occur in beef exported to the United States.

The outcome of this reassessment is that E.coli O157:H7 is not a hazard reasonably likely to occur in the beef meat produced at ME137.

The USDA-FSIS have deemed that the New Zealand HACCP programme to be equivalent to that of the US *Pathogen Reduction/HACCP Final Rule*.

The premises (ME137) HACCP plan follows this programme which incorporates a number of supporting systems (Pre-requisite Programmes). For example, temperature controls are maintained to prevent any growth of E.coli O157:H7 should occur. Effective, early meat chilling to less than +7°C is applied to all chilled product with vacuum packed chilled product being maintained in the range +1°C to -1°C. Frozen product is reduced to -12°C and maintained at or below this temperature.

Premises (ME137) has participated in the national monitoring programme for E.coli O157:H7 for premises exporting beef to the United States since 11th June 2002. This programme has been running since that date with the understanding of both exporters and importers that it meets the requirements of the FSIS Directive 10010.1. Five 27kg cartons of beef are randomly selected each day from the boning room immediately prior to the carton closure. A composite sample of 25g is collected from multiple locations within each carton and composited 125g for analysis. All analyses are carried out in an independent laboratory approved and audited by the New Zealand government, and are certified to ISO Guide 25. Analytical methods meet the requirements of FSIS Directive 10010.1, and include enrichment, screening with AOAC approved ELISA and VIA kits, and isolation using immunomagnetic separation (IMS) procedures.

Between the period 11th June 2002 and 15th of August 2007 samples of manufacturing beef have been tested for the presence of E.coli O157:H7 with no E.coli O157:H7 being detected. These results indicate that there is a 95% Probability that 0.2% of product could potentially contain E.coli O157:H7. This is considered to be a hazard not reasonably likely to occur.

This attestation is made to demonstrate that beef supplied to customers in the US from Lean Meats Oamaru Limited (ME137) meets the requirements of FSIS Notice "E.coli O157:H7 Contamination of Beef Products", 9 CFR Part 417, 7th October 2002.

G.M.Thomas
 Compliance Manager
 30/10/2007.

**Abco
Meats Ltd****HACCP Information and Response to E coli 0157:H7 Issues**

Bulk manufacturing grade beef produced at Abco Meats Ltd is sampled following New Zealand Food Safety Authority Escherichia Coli 0157:H7 Technical Procedures for Bulk Manufacturing Beef AND Bobby Veal in US-Listed Slaughter Premises and Packing Houses.

Abco Meats Ltd conducts regular verification of the Bovine slaughter/dressing and cutting / boning HACCP plan, as part of the requirements of the HACCP Plan.

The following data summarises the verification findings:

- All e.Coli 0157:H7 sampling to date has returned "not detected" results
- Low prevalence in the rate of detection in the nation wide bulk meat testing program suggests a low prevalence in the food animal population
- Studies show New Zealand farm management practices limit the carriage of E coli 0157/NM
- Abco Meats procure stock from the same regions as other US listed export plants
- Feed lot cattle are not processed at Abco Meats
- All beef carcasses at Abco Meats are chilled prior to boning
- NMD testing indicates that results are in line with national profiles
- New Zealand Food Safety Authority reviews of Abco Meats compliance with regulatory controls have returned "acceptable" outcomes
- All bulk trim destined for the US market continues to be tested for E coli 0157/H7, as per New Zealand Food Safety Authority Escherichia Coli 0157:H7 Technical Procedures for Bulk Manufacturing Beef AND Bobby Veal in US-Listed Slaughter Premises and Packing Houses.

Specific controls that operate in conjunction with the HACCP plan and e.Coli sampling programs include:

- Product is derived from pasture fed cattle
- All animals are washed prior to slaughter
- During processing weasand clips and bung bags prevent any potential contamination from the gastro intestinal tract
- All equipment used prior to final inspection in the slaughter and dressing process is sterilized in water >82°C after cutting through hide, into blind cavities, through diseased tissue and when contaminated
- Any carcass contamination is trimmed

**Abco
Meats Ltd**

- Post mortem inspection is conducted by an independent body
- Operating procedures include SSOP's, GMP and ZFT
- Product is only eligible for export if all HACCP requirements have been met and e.Coli

The above controls are all routinely subjected to the following verification:

- Pre shipment HACCP checks
- Process control checks
- Internal verification
- External verification

Abco Meats concluded that E coli O157:H7 is not reasonably unlikely to occur in boneless beef produced at ME137