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11.01.12

ME127

To Whom It May Concern,

The USDA Food Safety and Inspection Service Notice titled “*E coli* 0157:H7 Contamination of Beef Products”, 9 CFR part 417 dated the 7th of October 2002 required all US establishments to reassess their HACCP plans with respect to the control of *E coli* 0157:H7 based on new information that *E coli* 0157:H7/NM is more prevalent in the USA than previously thought.

As ME127 is a US listed establishment a thorough reassessment was carried out and it was concluded that ***E coli* 0157:H7 is not a hazard likely to occur**. This conclusion has been documented in the establishments HACCP plan and approved by the New Zealand Food Safety Authority.

New Zealand’s hygienic slaughter and dressing requirements ensure that processing is carried out in a manner that minimises contamination and produces a product fit for intended purpose. These practices further reduce the presence of any microbiological contamination. For example:

- Pasture fed animals
- Potable water wash pre slaughter (cattle only) All of these cattle are accompanied by an Animal Status Declaration signed by the owner declaring they are free from chemical Residues.
- Ante-mortem inspection of all animals by NZFSA VA prior to slaughter
- Hygienic slaughter and dressing – equipment sterilisation between carcasses prior to inspections is carried out at $\geq 82^{\circ}\text{C}$
- Sealing of oesophagus/weasand with clips
- Sealing of bung with a plastic bag and elastrator ring
- NZFSA approved SSOPs/Pre requisite programmes
- Process monitoring by trained competent supervisory staff on a run to run basis
- Trimming of visible contamination
- Critical control Point to ensure Zero Faecal. This meets the FSIS “US Pathogen reduction /HACCP final Rule”
- Validated refrigeration parameters to control microbial growth
- Control Point at pre trim to ensure Zero faecal and SRM removal prior to boning.
- Full time veterinary presence onsite for verification of process and certification
- Operators trained and competent in assigned tasks.
- Post mortem inspection carried out by independent inspectors
- Packaging methods to minimise bacterial growth
- Robust verification programmes (internal, external and extrinsic verification)

The processing facilities covered by this letter of guarantee all perform daily regulatory sampling of Beef product for *E coli* 0157:H7 in accordance with procedures/lot size agreed between the New Zealand government (NZFSA), and FSIS. "Interventions to Reduce, Eliminate, or Control *E. coli* 0157:H7 to an Undetectable level" are N60 testing of > 960grams being carried out for each days production. Twelve cartons @ (27.2kg) of beef are randomly selected each day from this premise. A composite sample of 80g is collected from multiple locations within each carton and composited (960g) for analysis. Samples are analyzed by independent testing laboratories that are approved and audited by the New Zealand

Government and are IANZ approved and certified to ISO 17025. Analytical methods used meet the requirements of FSIS Directive 10.010.1.

New Zealand has a test and hold protocol, this means that product is not exported until a negative result is received from a government approved testing laboratory

There have been no incidences of E coli 0157:H7 illness associated with consuming New Zealand Beef products.

Yours sincerely

Heather Dick
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