



11/01/11

Riverlands Manawatu (ME 119)

HACCP Response to *E. coli* O157:H7 issues

To whom it may concern _____

A USDA Food Safety and Inspection Service (FSIS) notice titled "*E. coli* O157:H7 Contamination of Beef Products" requires all **US** establishments to reassess their HACCP plans with respect to control of *E. coli* O157:H7 based on new information that *E. coli* O157:H7/NM is more prevalent in the U.S. than previously thought.

The agency requires certain actions to be undertaken where it is determined that *E. coli* O157:H7 is a hazard reasonably likely to occur, including an intervention (microbiological decontamination) step.

Where it is determined by the reassessment that *E. coli* O157:H7 is not reasonably likely to occur, FSIS expects that this position is scientifically justifiable and documented.

Riverlands Manawatu ME 119 has reassessed its HACCP plan 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, Canada or any other market.

From the review of the HACCP plan *E. coli* O157:H7 is not a hazard that is reasonably likely to occur in beef meat from Riverlands Manawatu ME 119. Below are statements of justification.

1. Up to and including the 19th February 2008 our premises ME 119 participated in the national monitoring programme for *E. coli* O157:H7 for premises exporting beef to the United States since its inception in 1998. The program was used since July 1998 with the understanding of both exporters and importers that it meets the requirements of US directive 10010.1. 12 cartons (@ 27.5 kgs) of beef were randomly selected each day from each premise. A composite sample of 80g was collected from multiple locations within each carton, and composited (960g) for analysis. All analysis was carried out in laboratories 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.

For the current processing season June10-January 11 a total of 1356 cartons have been sampled and Riverlands Manawatu has not returned a positive for E.Coli;H7 for beef and only product that is compliant with HACCP requirements and has tested negative for E.Coli H7 is shipped.

From the 20th February 2008 our premises ME 119 has participated in the national monitoring programme for E. coli O157:H7 for premises exporting beef to the United States laid down in the US OMAR issued by the NZFSA. This required twelve cartons (@ 27.5 kgs) of beef to randomly selected each day. Five pieces of meat from separate locations in each carton using Schedule 1 NMD section 3.4.2, Figure 11 as a guideline were sampled. Each piece of meat was sampled by trimming a thin surface slice Where possible, a surface from the original outside of the carcass was sampled. A surface sample with dimensions of roughly 100mm x 50mm (rectangular) or 50cm² (circular 80mm diameter) and <2mm deep was sampled to ensure sufficient weight of sample was collected. The combination of the 12 x5 samples (N=60) weighed at least 960 grams. The samples were dispatched to a LAS approved laboratory for analysis for E.Coli 0157:H7 using the official test 23.1.

Based on the above and as a result of the review of the HACCP plan, E. coli O157:H7 is not a hazard that is reasonably likely to occur in beef meat from Riverlands Manawatu ME 119.

2. Using the statistics supplied by asure (Government meat inspection Agency) in their Pi3 Benchmark program Riverlands Manawatu consistently shows very good performance in the area of identified contamination. The removal of contamination is carried out on the Detain. Once removed, a government meat inspector checks and passes the carcasses.
3. While the review of our HACCP plan has shown *E. coli* O157:H7 is not a hazard that is reasonably likely to occur in beef meat from Riverlands Manawatu ME 119, we have in place numerous interventions and controls to minimise the occurrence of contamination of carcasses and these include.
 - ◆ All cattle are washed with potable water prior to slaughter. All of these cattle are accompanied by an

Animal status declaration signed by the person in charge of the cattle on the farm. All Cattle slaughtered at Riverlands Manawatu are grass feed.

- ◆ Sterilisation of equipment in 82°C between each carcass prior to inspection.
- ◆ An approved SSOP programme that is based on Good hygienic practices that meets all requirements of the NZFSA
- ◆ Opening cuts are monitored in regards to the transfer of contamination from hide. All process steps are monitored by trained supervisory staff on a run by run basis.
- ◆ All oesophagus are clipped to ensure no gut content contamination.
- ◆ Plastic bags are applied and sealed on all bungs to prevent spillage.
- ◆ A CCP that monitors the removal of any defects noted at meat inspection.
- ◆ A ZFT programme that monitors the effectiveness of the process. This programme meets the requirements of the FSIS "US Pathogen Reduction/HACCP Final Rule". This is a CCP and is monitored by trained Quality control staff.
- ◆ All refrigeration parameters have been validated.
- ◆ All carcasses are subject to a pre-trim inspection prior to boning.
- ◆ All operators are trained and each processing step is listed in the HACCP plan has a task instruction that is signed of by the staff member and their supervisor.

4. Each process step is monitored by the supervisor who records these checks on the relevant check sheet. Each program is subject to internal audit by our stand alone compliance team and external verification by NZFSA (the New Zealand government verification agency). Both internal and external audits show the premises to be maintaining a very high level of compliance

- ◆ On site NZFSA PBV audit level 6
- ◆ NZFSA technical review level 6

5. The New Zealand Food Safety Authority (NZFSA), the competent New Zealand authority recognised by FSIS, has also submitted a scientific case to FSIS supporting the position that *E. coli* O157:H7 is **NOT** reasonably likely to occur in New Zealand boneless beef.

6. Riverlands Manawatu ME 119 conducts ongoing assessments of its HACCP plan based on production circumstances and results of extensive microbiological testing.

In closing and in light of the above information, Riverlands Manawatu ME119 has reassessed its HACCP plan and hazard identification and analysis and concludes that *E. coli* O157:H7 is not a hazard that is reasonably likely to occur in beef exported to the United States, Canada or any other market. Our HACCP plan is continuing to meet New Zealand and US requirements.

Yours truly

Diane Wood,



Compliance Co-ordinator
Riverlands Manawatu (ME119)