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INFORMATION SHEET January 2012

Reassessment of the AFFCO New Zealand Limited – Wairoa (ME 42) HACCP plan to determine the likelihood of *E.coli* O157:H7 being a hazard

The United States Federal Register Notice (67 FR 62325) 9 CFR, Part 417 titled "E.coli O157:H7 contamination of Beef Products" requires all establishments to reassess their HACCP plans with respect to control of *E.coli* O157:H7, based on new information that *E.coli* O157:H7 is more prevalent than the US had previously thought.

FSIS requires certain actions to be undertaken where it is determined that *E.coli* O157:H7 is a hazard that is reasonably likely to occur, including a microbial decontamination intervention step.

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

The reassessment has confirmed that *E. coli* O157:H7, is not a hazard, likely to occur in beef meat, from premises ME 42.

Our premises, ME42 participates in the National Microbiological Database which is a programme mandated by the NZFSA. This programme is deemed to be equivalent to the *E. coli* and *Salmonella* testing requirements of the *US Pathogen Reduction / HACCP Final Rule*. We have also participated in the monitoring programme for *E.coli* O157:H7 for premises exporting beef to the United States since June 1998. This programme is used with the understanding of both exporters and importers, that it meets the requirements of US Directive 10010.1

Twelve cartons (@27.2kg) of beef are randomly selected each day from each premise. Five (5) samples are collected from multiple locations within each of the 12 cartons selected and composited (960g) for analysis (n=60).

The analytical methods meet the requirements of FSIS Directive 10010.1 & include enrichment, screening with AOAC approved Biocontrol Assurance GDS kits, isolation using immunomagnetic separation (IMS) procedures.

Plant *E.coli* 0157:H7 Data.

From the commencement of testing in June 1998 through until 04 January, 21,220 cartons have been tested for *E coli* 0157:H7 seven of which have returned a positive as of January 2012. Should a positive detection be made, then procedures are in place to prevent the shipment of the product. Only product that is compliant with the monitoring requirements of the HACCP Plan and tested "negative" for *E.coli* 0157H7 is shipped.

The HACCP Plan at ME 42 was reviewed and validated by AgriQuality recognized evaluator on 6th June 2007, the CCP is:

CCP 1 ZFT *Carcasses post slaughter and dressing inspected after Regulatory Post Mortem Inspection, detain trim and AsureQuality NZ re-inspection.*

The HACCP review included a review of the interventions and key steps which minimize contamination during processing. These included monitoring procedures, additional to CCP monitoring:

- Stock Acceptability for Slaughter.
All stock on arrival is assessed for cleanliness and cleaned as required by swim bathing and spray washing. All animals processed are raised on pasture or naturally conserved grass and are therefore not heavily contaminated with dags, as is usually encountered with cattle, from grain feed lots.
- Hygienic Dressing Controls.
This is based on a zero tolerance for faecal contamination on the carcass at the completion of the dressing process.

To assist this outcome, the following management is practiced:

- The weasand is cleared and clamped to prevent contamination from the gastrointestinal tract.
 - The bung is cleared and sealed with a rubber ring and then covered with a plastic bag, to prevent spillage.
 - All operators are fully trained with the training emphasis being to full follow hygienic techniques. They are regularly monitored, to ensure that task descriptions are being followed. Any non compliance is formally corrected by the supervisor.
 - All carcasses are subject to independent meat inspection, for the presence of faecal contamination, prior to leaving the slaughter floor. Any found with contamination are detained for trimming and subjected to re inspection, by a meat, inspector, and prior to leaving the slaughter floor.
- Cold Chain Management.

ME 42 refrigeration parameters have been validated and approved by NZFSA VA as having sufficient capacity to meet carcass cooling and freezing requirements. Specific carcass chiller and blast freezer CATR Records are reviewed on a daily basis.

- Pre- Trim

The pre-trim programme ensures that all carcasses processed are free of visible defects and clean prior to the commencement of cutting.

- Final Product Inspection. (CUSUM)

A random inspection programme checks product immediately prior to its leaving the cutting room. The programme monitors defect trends as well as identifying critical defects. Appropriate corrective and preventative actions are specified; these include product rework and feed back to the slaughter department.

- Pre-requisite programmes. (SSOP's)

All pre-requisite programmes are approved by NZFSA VA and are monitored on a regular basis to ensure compliance to regulatory requirements. These include sanitary design, potable water, premises sanitation, vermin control, chemical and residue control and training.

The plant has a full time government veterinary presence at all times during slaughtering. Additionally there is a formal MAF audit process practiced, including independent USA reviews, to ensure that regulatory requirements are met consistently.

Conclusion

From the information outlined above it is concluded that *E coli* 0157:H7 is a hazard unlikely to occur on beef produced at ME 42.



Austine Watson
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