



## **CMP Kokiri Limited**

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We are driven by our People,  
Innovation, Customers and Supplier  
relationships "TO BE THE BEST"

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

### **CMP KOKIRI LTD (ME66)**

**17<sup>th</sup> January 2011**

#### **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 US 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 reasonable likely to occur, FSIS expects that this position is scientifically justifiable and documented.

CMP Kokiri Ltd (ME66) 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 CMP Kokiri Ltd (ME66). Below are statements of justification.

1. Our premises ME66 has participated in the national monitoring programme for E. coli O157:H7 for premises exporting beef to the United States since 30th June 1998. The programme has been used with the understanding of both exporters and importers that it meets the requirements of US Directive 10010.1. Twelve cartons (@27.2 kgs) of beef are randomly selected each day from our premise. A composite sample of 80g is collected from multiple locations within each carton, and composited (960g) for analysis. All analyses are 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.



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Since testing began (30th June 1998) and for the period ended 24<sup>th</sup> December 2010 for E. coli O157:H7, CMP Kokiri Ltd (ME66) has sampled 16,122 cartons with two positive detections (i.e. one composite sampled from 12 cartons representing one lot). Using the confidence intervals agreed by Dr Rodger Cook of NZFSA and the USDA table for probabilities in exploratory sampling, there is a 95% confidence that the real prevalence of E.coli O157:H7 is between 0.0015% and 0.045%, thus we consider that the risk of E. coli O157:H7 is NOT reasonably likely to occur.

In addition all the agreed testing has been carried out for Salmonella and this has never been detected on beef tested from CMP Kokiri (ME66).

2. The removal of contamination is carried out on the Detain and 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 CMP Kokiri Ltd (ME66), we have in place numerous interventions and controls to minimise the occurrence of contamination of carcasses and these include:
  - a. 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.
  - b. Sterilization of equipment in 82 degrees C water between each carcass prior to inspection.
  - c. An approved SSOP programme that is based on Good Hygienic Practices (GHP) that meets all requirements of the New Zealand Food Safety Authority (NZFSA).
  - d. GHP that monitor opening cuts in regards to the transfer of contamination from hide. GHP is monitored by trained supervisory staff on a run by run basis.
  - e. All oesophagus are clipped to ensure no gut content contamination.
  - f. Plastic bags are applied and sealed on all bungs to prevent spillage.
  - g. A CCP that monitors the removal of any defects noted at meat inspection.
  - h. A ZFT programme that monitors the effectiveness of the process. The programme meets the requirements of the FSIS "US Pathogen Reduction/HACCP Final Rule".
  - i. All operators are trained and each processing step is listed in the HACCP plan and has a task instruction that is signed off 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 programme is subject to internal audit by our stand alone compliance team and external verification by NZFSA. Both internal and external audits show the premises to be maintaining a very high level of compliance.
  - On site NZFSA Verification Agency audit level Step 6 (highest achievable)
  - NZFSA Verification Agency Technical Review Step 6 (highest achievable)



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5. The NZFSA, the competent New Zealand authority recognized 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. CMP Kokiri Ltd (ME66) conducts ongoing assessments of its HACCP plan based on production circumstances and results of extensive microbiological testing.
7. Only product that is compliant with the HACCP requirements and tested negative for E. coli O157:H7 is shipped.

In closing and in light of the above information, CMP Kokiri Ltd (ME66) has reassessed its HACCP plan, 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,

A handwritten signature in blue ink that reads 'K Doolan'.

Karen Doolan  
Technical Manager  
CMP Kokiri Ltd