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Response to *E.coli* 0157:H7 issues

CMP Marlborough Ltd (ME70)

13th January 2011

To Whom it May Concern

A USDA Food Safety and Inspection Service (FSIS) notice titled “*E. coli* 0157:H7 Contamination of Beef Products” requires all **US** establishments to reassess their HACCP plans with respect to control of *E. coli* 0157:H7 based on new information that *E. coli* 0157: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* 0157:H7 is a hazard reasonably likely to occur, including an intervention (microbiological decontamination) step.

Where it is determined by the reassessment that *E. coli* 0157:H7 is not reasonably likely to occur, FSIS expects that this position is scientifically justifiable and documented.

CMP Marlborough Ltd (ME70) has reassessed its HACCP plan to determine whether or not *E.coli* 0157H7 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* 0157:H7 is not a hazard that is reasonably likely to occur in beef meat from CMP Marlborough Ltd (ME70). Below are statements of justification.

- 1 Our premise ME70 has participated in the national monitoring programme for *E. coli* 0157:H7 for premises exporting beef to the United States since October 1998. The programme has been used since July 1998 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 this premise. A composite sample of 80g is collected from multiple locations within each carton, and composited (960g) for analysis. All analysis 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 10010.0, and include enrichment, screening with AOAC approved ELISA and VIA kits, and isolation using immunomagnetic separation (IMS) procedures.

Since testing began (29th June 1998) and for the period ended 23rd December 2010 for *E. coli* 0157:H7, CMP Marlborough Ltd (ME70) has sampled 15,623 cartons and no confirmed positives have been detected. For the current processing season (October to December inclusive) a total of 552 cartons have been sampled, with no confirmed positive results returned. We used the confidence intervals agreed by Dr Roger Cook of NZFSA. Our data gives an expected prevalence of 0%, thus we consider that the risk of *E.coli*0157:H7 is **NOT** reasonably likely to occur. Even with a 95% confidence of the actual prevalence being between 0% and 0.527% this again shows *E. coli* 0157:H7 is **NOT** reasonably likely to occur.

Also we only slaughter cattle that are raised on farmland pasture, which as per figure 2 in the NZFSA submission have a far lower detection rate.

In addition all the agreed testing has been carried out for Salmonella and this has never been detected on beef tested at ME70.

- 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* 0157:H7 is not a hazard that is reasonably likely to occur in beef meat from CMP Marlborough Ltd (ME70), 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 CMP Marlborough Ltd (ME70) are grass feed.
 - Sterilization of equipment in 82^oC water between each carcass prior to inspection.
 - An approved SSOP programme that is based on Good hygienic practices that meets all requirements of the NZFSA.
 - Good Hygienic Practice (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.
 - 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. The programme meets the requirements of the FSIS “US Pathogen Reduction/ HACCP Final Rule”
 - All operators are trained and each processing step is listed in the HACCP plan 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 program is subject to internal audit by our stand alone compliance team and external verification by NZFSA (New Zealand Food Safety Authority). Both internal and external audits show the premises to be maintaining a very high level of compliance.
 - On site NZFSA VA PBV audit level 6
 - MAF VA technical review is conducted three-monthly in conformance with NZFSA Verification Statement of Policy.
- 5 The New Zealand Food Safety Authority (NZFSA), the competent New Zealand authority recognized by FSIS, has also submitted a scientific case to FSIS supporting the position that *E. coli* 0157:H7 is **NOT** reasonably likely to occur in New Zealand boneless beef.
- 6 CMP Marlborough Ltd (ME70) 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 0157:H7 is shipped.

In closing and in light of the above information, CMP Marlborough Ltd (ME70) has reassessed its HACCP plan, hazard identification and analysis, and concludes that *E. coli* 0157: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



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Technical Manager
CMP Marlborough Ltd (ME70)