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Reassessment of the AFFCO New Zealand Limited – South Pacific Meats (SPM51) 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 that this position is scientifically justifiable & documented.

South Pacific Meats Ltd - Awarua (SPM51) has reassessed its Bobby Calf HACCP plan to determine whether or not E.coli O157:H7 is a hazard that is reasonably likely to occur during processing on plant. From this reassessment it could not be determined that E.coli O157:H7 is not a hazard that is reasonable likely to occur on plant. As a result South Pacific Meats Ltd - Awarua (SPM51) have included an intervention that is approved by NZFSA VA. This is a Critical Control Point (CCP) in the premises HACCP plan.

The intervention implemented at South Pacific Meats Ltd - Awarua (SPM51) is ASC spray, and is used in accordance with the USA regulations.

South Pacific Meats Ltd - Awarua participates in the National Microbiological Database E.coli O157:H7 monitoring program for premises exporting bobby calf meat to the United States. This program has been implemented since the start of the 2003 bobby calf season. In this program twelve cartons of bulk packed bobby veal are randomly selected. A sample (n=60) is collected from multiple locations within the selected cartons, and composited (960g) for analysis. The analysis is performed by an independent LAS approved Laboratory that is approved & audited by the New Zealand Food Safety Authority (NZFSA). 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.

In addition to the intervention step as described above, South Pacific Meats Ltd - Awarua have in place numerous other controls to minimize the microbiological contamination of bobby carcasses, these include:

- 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 plugged to prevent spillage.
 - All operators are fully trained with the training emphasis being on hygienic dressing techniques (Industry Standard 5: Slaughter and Dressing). They are regularly monitored, to ensure that task descriptions are being followed.
 - 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, prior to leaving the slaughter floor.
- Cold Chain Management.
 - South Pacific Meats Ltd - Awarua refrigeration parameters have been validated and approved by NZFSA VA as having sufficient capacity to meet carcass and carton cooling and freezing requirements.
- 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 monitored on a regular basis to ensure compliance to regulatory requirements and to ensure they remain effective.

- NZFSA-VA Reviews

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

In summary, South Pacific Meats Ltd - Awarua) has reassessed its Bobby Calf HACCP Plan as required and considers that after the introduction of a decontamination intervention & associated CCP, the HACCP plan meets the requirements of the United States Federal Register Notice (67 FR 62325) 9 CFR, Part 417 titled "E.coli O157:H7 contamination of Beef Products" and that our HACCP plan continues to meet both New Zealand & United States requirements.

Yours faithfully



Dawn McCracken
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