



**Te Kuiti Meat Processors Ltd (ME 104) Bobby calf HACCP plan
reassessment for *E.coli* O157:H7 – Summary sheet.**

16th February 2006

To whom it may concern,

The USDA Food Safety and Inspection Service (FSIS) notice titled "*E.coli* O157:H7 contamination of beef production" required 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 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 expects that this position is scientifically justifiable & documented.

Te Kuiti Meat Processors Ltd 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 reasonably likely to occur on plant. As a result Te Kuiti Meat Processors Ltd have included a chemical decontamination intervention that has been approved by MAF VA. This is a Critical control point in the premises HACCP plan.

The chemical decontamination chemical that is being implemented at Te Kuiti Meat Processors Ltd is Acidified sodium chlorite (Enviroxyde – supplied by Orica Chemnet Ltd). This antimicrobial agent has been approved by USFDA & will be used according to the parameters specified in 21 CFR 173.325.

Te Kuiti Meat Processors Ltd participates in the National Microbiological Database *E.coli* O157:H7 monitoring program for premises exporting bobby calve meat to the United States. This program has been implemented since the start of the 2003 bobby calf season. In this program five cartons of bulk packed bobby veal are randomly selected daily & a composite sample is tested for *E.coli* O157:H7. 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 ELISA & VIA kits, & isolation using immunomagnetic separation (IMS) procedures.

In addition to the chemical decontamination intervention step as described above, Te Kuiti Meat Processors Ltd have in place numerous other intervention &/or controls to minimize the microbiological contamination of bobby carcasses, these include:

- Approved SSOP programs that are based on good manufacturing practices & meet all NZFSA specifications, including those that are specific for the United States.
- Critical control points that monitor specific points in the chain that have been assessed in a hazard analysis as being critical in controlling faecal contamination on carcasses.
- All SSOP's & the bobby HACCP plan undergo regular internal audits by the Company Compliance team to ensure they are being implemented as required by the responsible person.
- Dressing procedures include clipping the oesophagus & plugging the rectum to prevent leakage of ingesta/faecal material during dressing.
- A Zero Faecal Tolerance program that monitors the control of faecal contamination, ensuring that carcasses contaminated with faecal contamination do not leave the Slaughter floor. This program complies with the requirements of the FSIS "US Pathogen reduction/HACCP final rule".
- All refrigeration parameters are validated & approved by NZFSA.
- All carcasses are subject to a pre trim inspection prior to boning.
- Each process step is monitored by the responsible Supervisor who records the findings identified during the check & what corrective actions were taken for any non compliances.
- All SSOP's & HACCP plans are audited by the full time on site NZFSA personnel according to the NZFSA National verification system, these audits identify that the Company is maintaining a very high level of compliance as the premises has been on the highest step (step 6) for the last five years. Further to this the premises undergoes an independent review by an off site NZFSA inspector every month, there have been no unacceptable audits over the last six years.

In summary, Te Kuiti Meat Processors Ltd has reassessed its HACCP plan as required by the FSIS & considers that after the introduction of a decontamination intervention & associated CCP, the HACCP plan meets with the requirements of the FSIS notice titled "*E. coli* O157:H7 contamination of beef production" & that our HACCP plan continues to meet both New Zealand & United States requirements.

Yours Faithfully



James Riley
Compliance Manager
Te Kuiti Meat Processors Ltd.