



Te Kuiti Plant
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To Whom It May Concern,

ME127 premise processes Adult Bovine Beef species only with no traces of any other non-beef protein or DNA.

ME127 is also a US and Canada listed establishment and operates under a Ministry of Primary Industries (MPI) Risk Management Program (RMP). MPI is the Government authority responsible for New Zealand Food Safety and Overseas Market Access Requirements to ensure compliance with foreign legislation and New Zealand government requirements.

The RMP incorporates HACCP principles and has been documented in the establishments HACCP plan, which is reassessed annually and approved by Ministry of Primary Industries. The HACCP plan contains a Market Access (option 3) CCP, which directly address the hazard of Shiga toxin-producing Escherichia coli (Non-O157 STEC) and Escherichia coli O157:H7 as not a hazard likely to occur.

When good operating hygiene is maintained, detecting STECs on adult bovine meat, from animals older than R1 (animals less than 1 year old, and older than a bobby calf) is rare. MPI reviewed E.coli O157:H7 and top 6 nSTEC test results data and the MPI document Occurrence of E.coli O157:H7/NM on New Zealand Frozen Beef exported to the United States – A Case for Designation as “Reasonably Unlikely to Occur” in 2018, and found that at a national level STEC remains reasonably unlikely to occur in adult beef over the age of R1.

New Zealand’s hygienic slaughter and dressing requirements ensure that processing is carried out in a manner that minimises contamination and produces a product fit for intended purpose. These practices further reduce the presence of any microbiological contamination. For example:

- Pasture fed animals
- Potable water wash pre slaughter (cattle only) All of these cattle are accompanied by an Animal Status Declaration signed by the owner declaring they are free from chemical Residues.
- Ante-mortem inspection of all animals by MPI VS prior to slaughter
- Hygienic slaughter and dressing – equipment sterilisation between carcasses prior to inspections is carried out at $\geq 82^{\circ}\text{C}$
- Sealing of oesophagus/weasand with clips
- Sealing of bung with a plastic bag and elastrator ring
- MPI approved SSOPs/Pre requisite programmes
- Process monitoring by trained competent supervisory staff on a run to run basis
- Trimming of visible contamination

- Market Access Critical Control Point (CCP) to ensure Zero Faecal. This meets the FSIS “US Pathogen reduction/HACCP final Rule”
- Validated refrigeration parameters to control microbial growth
- Control Point at pre trim to ensure Zero faecal and SRM removal prior to boning.
- Full time veterinary presence onsite for verification of process and certification
- Operators trained and competent in assigned tasks.
- Post mortem inspection carried out by Independent MPI Inspectors
- Packaging methods to minimise bacterial growth
- Robust verification programmes (internal, external and extrinsic verification)
- Separation of R1 Cattle (less than 1 year old) and separate N60 E.coli Sampling

Our premises ME127 has participated in the National Monitoring Programme for *Escherichia coli* **0157:H7** for premises exporting beef to the United States since June 1998. Additionally, from 4 June 2012, our premises have participated in the National Monitoring Programme for six other serogroups of Shiga Toxin-producing E. coli (O26, O45, O103, O111, O121 and O145). The New Zealand government programme for control and monitoring has been determined to be equivalent to the US Department of Agriculture Food Safety Inspection Service proposed rule “Shiga Toxin-Producing *Escherichia coli* in Certain Raw Beef Products” (Federal Register Volume 76, Number 182, September 20, 2011).

The current programme has been accepted by the FSIS as equivalent to US monitoring programs: Twelve cartons (@27.2kg) of beef are randomly selected each day from each premise. A composite N60 sample is collected from multiple locations within the selected cartons, and composited (375g) for analysis. All analyses are carried out in laboratories approved and audited by International Accreditation New Zealand (IANZ) and attain the accreditation as an “IANZ Accredited Laboratory” certified to ISO Guide 17025.

Analytical methods meet the requirements of FSIS Directive 10010.1 and include enrichment; screening with AOAC approved BioControl Assurance GDS kits, and isolation using immunomagnetic separation (IMS) procedures. New Zealand has a test and hold protocol, this means that product is not exported until a negative result is received from an IANZ Accredited Laboratory.

There have been no incidences of E coli 0157:H7 illness associated with consuming New Zealand Beef products.

Yours sincerely



Juanita Morgan
UBP ADMIN