

January, 2023

## **US & Canada Supply Letter of Guarantee**

**ANZCO Foods Marlborough**

**Establishment ME70**

### **1. Establishment Registration.**

New Zealand export operations are conducted under the regulatory controls of the Ministry of Primary Industries (MPI). MPI is the Government authority responsible for Food Safety, Overseas Country Requirements and New Zealand Export Standards, ensuring the exported /supplied product is fully compliant with Foreign and New Zealand government requirements underpinning the export health certificate process.

#### **Health Controls**

MPI veterinary officers have in addition to overseeing disease and health control, a fulltime on plant role, monitoring / auditing company performance in the discharge of their obligations under the New Zealand Animal Products Act.

#### **Overseas Listing**

Establishment ME70 is USA and Canada listed and operates under an MPI Risk Management Program (RMP) to produce, as well as other products, bulk packed boneless manufacturing beef intended for grinding.

### **2. HACCP Plan**

The RMP incorporates HACCP components based on Codex principles. The HACCP plan contains CCP's which directly address the hazard of Shiga toxin-producing *Escherichia coli*.

#### **HACCP Reassessment**

The HACCP plan has been reassessed in accordance with the Federal Register Notice 9 CFR part 417 Docket Number 00-022 N dated 7 October 2002 – *E coli* 0157:H7 Contamination of beef products.

This included the hazard consideration within the HACCP plan of the additional non O157 STEC's being, O26, O111, O45, O103, O121 and O145.

The HACCP reassessment has determined that while STECS may be a potential hazard on incoming cattle it has been concluded that due to the effective implementation of the HACCP plan and Sanitary Standard Operating Procedures the hazard has been effectively controlled resulting in it not being reasonably likely to occur on product and the current HACCP plan is adequate to address these hazards.

The HACCP Plan has determined *E coli* 0157:H7 in boneless trim is:

Likely to occur

OR

Not likely to occur

The reassessed HACCP Plan reviewed all steps in the process including the following interventions:

- Ante mortem on all livestock pre-slaughter by competent government officials
- Identification and management of ill or injured livestock
- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export to the United States or Canada
- Cattle assessed for cleanliness for slaughter
- Highly trained operators
- After stunning -sealing of weasand by application of a clip/plug to prevent spillage
- Sealing of the bung via bagging to control cross contamination
- Line speeds appropriate to providing adequate time for hygiene inspections and dressing of the carcase
- Sanitising hands and equipment between carcases for high risk activities
- Knife sterilisation between carcases
- All carcases are subjected to a final inspection and hygiene trim
- Zero tolerance is in place for faecal contamination
- Chilling and freezing regimes to control microbial growth
- Product hygiene is monitored daily
- Documented Corrective and Preventative actions are in place and followed
- Microbial testing of contact surfaces and product

### 3. Verification *E coli* 0157:H7

#### Sampling

To verify the ongoing effectiveness of these interventions Establishment ME70 conducts sampling and testing of Beef Trimmings for *E coli* 0157:H7 as per the approved FSIS monitoring programme.

Twelve cartons (27.2kg) of beef are randomly selected each day from each FSIS premise. A composite N60 sample is collected from multiple locations within the selected cartons, and composited (375g) for analysis.

In the past 12 months Establishment ME70 has collected 11,280 samples with 1 positive for Top 7 STEC.

#### Hold and Release

All product is subject to a 'Test, Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and returned negative test results for *E coli* 0157:H7 are released for shipment.



### **Laboratory**

Samples are tested by an ISO17025 third party accredited laboratory to conduct testing of meat products for *E coli* O157:H7 or a Supplier Laboratory which has been assessed and approved by a third party auditors using the APMEA Supplier Laboratory Audit Checklist for *E coli* O157:H7.

### **Testing**

Analytical methods meet the requirements of FSIS Directive 10010.1.

Screening tests for *E coli* O157:H7 are performed using AOAC approved Bio-Control Assurance GDS kits for *E coli* O157.

Potential positive results are confirmed using (IMS) procedures.

### **4. BSE**

New Zealand legislation prohibits the feeding of all Restricted Animal Materials to all ruminants, including cattle.

All beef products destined for the USA and Canada are free from Specified Risk Materials (SRM). SRM is removed in accordance with Federal Register Notice 03-025IF.

All non-ambulatory, disabled or downer cattle are excluded from the United States product line.

### **5. Animal Welfare**

Animal Welfare monitoring is carried out in accordance with, and against, APMEA guidelines.

Third party audits are used to calibrate and verify the Animal Welfare standards achieved.

The site has a designated Animal Welfare Officer who has received training against national and international guidelines.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Karalee Wright".

Karalee Wright  
Compliance Team Leader  
ANZCO Foods Marlborough (ME70)