ANZCO Foods Eltham (ME43)

November 2023

To Whom it May Concern

A USDA Food Safety and Inspection Service (FSIS) notice titled "*E. coli* O157:H7 Contamination of Beef Products" requires all US listed 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 in the U.S. than previously thought.

The agency requires certain actions to be undertaken where it is determined that *E. coli* O157:H7 is a hazard reasonably likely to occur, including an intervention (microbiological decontamination) 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 and documented.

ANZCO Foods Eltham (ME43) has reassessed its HACCP plan to determine whether or not *E.coli* O157H7 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* O157:H7 is not a hazard that is reasonably likely to occur in beef meat from ANZCO Foods Eltham (ME43) Below are statements of justification.

1 ME43 has participated in the national monitoring programme for E. coli O157: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 five 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 ISO17025. 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.

In June 2012 testing commenced for Non O157 STEC (O26, O45, O113, O111, O121, O145) according to US OMAR Part 2, schedule 1 Assurance GDS® MPX Top 7 screen test .

Season[1]	2022	2023
Cartons Sampled	2124	2112
O157:H7	0	0
Non O157 STEC	1	0

1. Beef processing season extending from October to Sept

Only product that is compliant with HACCP requirements and has tested negative for E.coli O157:H7 and Non O157 STEC is shipped to US and Canadian markets.

In the event of a high activity period, as defined by the New Zealand Ministry for Primary Industries (MPI), product will be handled as per US OMAR Part 2: Schedule 1, F (1).

Based on the above, and as a result of the review of the HACCP plan, E. coli O157:H7 and Non O157 STECs are considered NOT to be a hazard that is reasonably likely to occur in beef meat produced at Eltham (ME43)

In addition, all the agreed testing has been carried out for Salmonella and this has never been detected on beef tested at ME43.

2 The removal of contamination is carried out on the Detain stand and, once removed, a government meat inspector rechecks and passes the carcases prior to release for boning and cutting.

3 While the review of our HACCP plan has shown E.coli O157:H7 and Non O157 STEC are not a hazard that is reasonably likely to occur in beef meat from Eltham (ME43) 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 Eltham (ME43) are grass feed.
- Sterilization of equipment in 82^{O}C water between each carcass prior to inspection.
- An approved SSOP programme that is based on Good hygienic practices that meets all requirements of the MPI.
- Good Hygienic Practice (GHP) that monitors 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 MPI. Both internal and external audits show the premises to be maintaining a very high level of compliance.

- On site MPI VS PBV audit level 6 (Highest level)
- MPI VS technical review is now conducted three-monthly in conformance with MPI Verification Statement of Policy.

5 The New Zealand Ministry for Primary Industries (MPI), the competent New Zealand authority recognized by FSIS, has also submitted a scientific case to FSIS supporting the position that E. coli O157:H7 and Non O157 STEC are NOT reasonably likely to occur in New Zealand boneless beef.

6 Eltham (ME43) conducts ongoing assessments of its HACCP plan based on production circumstances and results of extensive microbiological testing.

In closing and in light of the above information, ANZCO Foods Eltham (ME43) has reassessed its HACCP plan, hazard identification and analysis, and concludes that *E. coli* O157:H7 and Non O157 STEC are not a hazard that is reasonably likely to occur in beef exported to the United States, Canada or any other market. Our HACCP plan continues to meet New Zealand and US requirements.

Yours sincerely,

Peter Wagland
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