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HACCP ATTESTATION LETTER – JANUARY 2019

Reassessment of the AFFCO New Zealand Limited – AFFCO Horotiu (ME23) HACCP plan for BEEF to determine the likelihood of *E.coli* O157:H7 and nSTECs 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 expects that this position is scientifically justifiable & documented.

The reassessment has confirmed that *E.coli* O157:H7, is not a hazard, likely to occur in beef meat, from premises ME23.

Our premises ME23 has participated in the national monitoring programme for *E.coli* O157:H7 for premises exporting beef to the United States since June 1998. The current programme has been accepted by the FSIS as equivalent to US monitoring programmes.

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 the New Zealand government, and are 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.

Additionally, from 4 June 2012, our premises ME23 has 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).

AFFCO Horotiu *E.coli* O157:H7 and nSTEC Data

From the commencement of testing in June 1998 through until 07 January 2019, 70,339 cartons have been tested for *E. coli* 0157:H7, 13 of which have returned a positive as of January 2019. From the commencement of testing of the nSTECs in June 2012, 27,603 cartons have been tested for these six strains with 14 positive results. Should a positive detection be made, then procedures are in place to prevent the shipment of the product. Only product that is compliant with the monitoring requirements of the HACCP Plan and tested "negative" for *E. coli* 0157H7 and nSTECs is shipped to the USA. Where a Customer Guarantee is available confirming the product is not destined for raw ground beef or non-intact products, *E. coli* 0157:H7 and nSTECs positive product may be exported to the USA.

The HACCP Plan for BEEF at ME23 was reviewed and approved by an MPI VS recognized evaluator on 22 Feb 2007. The identified Critical Control Point (CCP) is:

CCP 1 ZFT *Carcasses post slaughter and dressing inspected after Regulatory Post Mortem Inspection, detain trim and AsureQuality NZ re-inspection.*

The HACCP review included a review of the interventions and key steps which minimize contamination during processing. These included monitoring procedures, additional to CCP monitoring:

- Stock Acceptability for Slaughter

All stock on arrival is assessed for cleanliness and cleaned as required by swim bathing and spray washing. All animals processed are raised on pasture or naturally conserved grass and are therefore not heavily contaminated with dags, as is usually encountered with cattle, from grain feed lots.

- 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 cleared and sealed with a rubber ring and then covered with a plastic bag, to prevent spillage.
- All operators are fully trained with the training emphasis being to full follow hygienic techniques. They are regularly monitored, to ensure that task descriptions are being followed. Any non compliance is formally corrected by the supervisor.
- 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, and prior to leaving the slaughter floor.

- Cold Chain Management

ME23 refrigeration parameters have been validated and approved by MPI VS as having sufficient capacity to meet carcass cooling and freezing requirements. Specific carcass chiller and blast freezer CATR Records are reviewed on a daily basis.

- 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 approved by MPI VS and are monitored on a regular basis to ensure compliance to regulatory requirements. These include sanitary design, potable water, premises sanitation, vermin control, chemical and residue control and training.

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

Conclusion

From the information outlined above it is concluded that *E coli* 0157:H7 and nSTECs is a hazard unlikely to occur on beef produced at ME23.

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