



Greenlea

9th January 2017

To whom it may concern

In accordance with the NZMPI requirements, Greenlea Premier Meats Ltd – Morrinsville, Licence ME82 has reassessed its HACCP plan to determine whether or not E.Coli 0157:H7 is a hazard that is reasonably likely to occur and it has been found that E. Coli 0157:H7 is not a hazard reasonably likely to occur in boneless beef - See NZFSA 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"***

We have participated in the National monitoring programme for E.Coli 0157:H7 for premises exporting beef to the United States since 29th 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, we commenced testing 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, 2012).

Samplers undergo annual competency checks carried out by 3rd party auditors. These competency checks cover both a written and practical check. Sampling is also verified by the Ministry of Primary Industries on a monthly basis.

All bulk product exported to USA is derived from lots which have been tested using the above protocol and for product processed from 5th January 2016 to 24th December 2016 tests are negative for Escherichia coli 0157:H7.

The latest E.Coli 0157:H7 results for the past year from 5th January 2016 to 24th December 2016 are listed below. We operate one hot boning room which is sampled every day it is in operation.

Lots sampled	Cartons sampled*	Lots positive
195	2340	0

The latest six other serogroups of Shiga Toxin-producing *E. coli* (O26, O45, O103, O111, O121 and O145) results from the 5th January 2016 to 24th December 2016 are listed below. We operate one hot boning room which is sampled every day it is in operation.

Lots sampled	Cartons sampled*	Lots positive
195	2340	1

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New Zealand procedures do not have a "High event period protocol" but operates on a lot a system which covers all products from a single boning room for the complete processing day. Prior to loading product for Nth American market all production dates are checked against the results sheet to confirm that all production days in the lot have been tested and results are negative.

Any product which laboratory testing find as not negative are held under MPI retain control pending further testing by ESR in Wellington. If results then found to be negative product is released by MPI and used without restriction. If confirmed as positive it is ineligible for Nth American Market.

Processing also includes the following steps which minimise the likelihood of contamination by E.Coli 0157:H7 and the six other serogroups listed by:

1. All cattle washed prior to slaughter.
2. Processing operates under a HACCP plan with CCP to eliminate visual contamination. This includes monitoring all carcasses.
3. During processing weasand clips and bung bags are applied to minimise leakage from alimentary canal.
4. Sterilising of equipment with 82⁰C after cutting through hide, into blind cavities, cutting diseased tissue and as and when required in work instructions.
5. Trimming of contamination from carcasses at point where contaminated.
6. Post mortem inspection by independent inspectors. Any diseased or contaminated carcasses are trimmed under their control, and reinspected prior to passing.
7. Process operating under SSOP's, HACCP, ZFT, SRM Removal and GMP.

Salmonella testing is done at commencement of each season in accordance with MPI requirements and all results have been negative

All packaging used as food contact material complies with the US Code of Federal Regulations Title 21 and EC Directive 2002/72/EC

The plant operates in a manner where all customer requirements for BSE and SRM is met. All spinal cord and dura mater removed in slaughterfloor. Separate equipment identifiable by either label or colour is used for SRM removal. The affected part of spinal column is removed when any misplits occur where spinal cord and dura cannot be removed. SRM procedures are subject to both internal and 3rd party audit. New Zealand has a total ban of feeding mammalian tissues to ruminants.

Non ambulatory animals are either condemned in yards or if processed are ineligible for export. ME 82 is subject to independent 3rd party animal welfare audits

Yours faithfully,

Terry McCarvill
Technical Manager

Greenlea Premier Meats Limited