



6th January, 2020

US Supply Letter of Guarantee
Greenlea Premier Meats Ltd Hamilton
Establishment ME124

1. Establishment Registration

New Zealand export operations are conducted under the regulatory controls of the Ministry for 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 over-viewing 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 ME124 is USA listed and operates under an MPI Risk Management Programme (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 CCPs, 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:
Not likely to occur

Greenlea Premier Meats Limited



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 are free from Specified Risk Materials (SRM). SRM is removed in accordance with Federal Register Notice 03-025IF by being fully compliant with the McDonald's BSE Firewalls.

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

Yours sincerely

Lennox Vellekoop

Technical Compliance Manager

Greenlea Premier Meats Limited



6th January 2020

2020 HACCP letter for Greenlea Premier Meats Ltd - ME124

In accordance with the NZ Ministry for Primary Industries (MPI) requirements, Greenlea Premier Meats Ltd – Hamilton, Licence ME124 has reassessed its HACCP plan to determine whether or not *E.coli* O157:H7 is a hazard that is reasonably likely to occur and it has been found that *E.coli* O157:H7 is not a hazard reasonably likely to occur in boneless beef, See 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"***.

We have participated in the National Monitoring Programme for *E.coli* O157: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 boning room. 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 Bio Control 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.

All bulk product exported to USA and Canada is derived from lots, which have been tested using the above protocol and has tested negative for Escherichia coli O157:H7 and also for six other serogroups of Shiga Toxin-producing *E.coli* (O26, O45, O103, O111, O121 and O145).

Greenlea Premier Meats Limited



We operate two boning rooms, each one is tested separately every day it is in operation. The test results for the 2019 processing year from 1st January 2019 to 31st December 2019 are as follows:

Boning room	Lots sampled	Cartons sampled	<i>E.Coli</i> O157:H7 positive	STEC positive
Hot Boning	255	3,060	1	1
Prime boning	280	3,360	0	1
Total	535	6,420	1	2

New Zealand procedures do not have a High Event Period protocol but operate on a lot system, which covers all product from a single boning room for the complete processing day.

If the daily testing returns a positive result for either *E.coli* O157:H7 or STECs, then all production from that processing day is ineligible for North American Market and any other countries and customers who have requirements in regards to product testing. Prior to loading product for North 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 negative.

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

Processing also includes the following steps, which minimise the likelihood of contamination by *E.coli* O157: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 of all carcasses;
3. during processing weasand clips and bung bags are applied to minimise leakage from alimentary canal;
4. sterilising of equipment with 82.0°C after cutting through hide, into blind cavities, cutting diseased tissue, and as and when required in work instructions;

Greenlea Premier Meats Limited



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 re-inspected prior to passing;
7. process operating under SSOPs, HACCP, ZFT, SRM Removal and GMP.

In all cases where positives have been confirmed there has been a full investigation of processing and HACCP review carried out and where appropriate corrective actions have been put in place.

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 Commission Regulation (EU) No 10/2011.

The plant operates in a manner where all customer requirements for BSE and SRM are met. All spinal cord and dura matter is removed in the 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.

All cattle are handled, held and slaughtered in a humane manner, which complies with various New Zealand Animal Welfare Codes of Practice and Country and customer animal welfare requirements. Non ambulatory animals are either condemned in yards or if processed are ineligible for export.

Greenlea Premier Meats Limited



ME124 is a beef only premises and no other species are processed on this site. MPI carry out a confidential random species verification programme to ensure that product is true to label and not adulterated with product from other species. This is done in accordance with the **Animal Products (Species verification) Notice 2014 No.2**. These tests confirm that the product tested from this premises is beef only and no other species have been identified as being in the product.

Yours faithfully,

Lennox Vellekoop

Technical Compliance Manager

Greenlea Premier Meats Limited



06th January 2020

2020 HACCP letter for Greenlea Premier Meats Ltd – ME82

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 NZMPI 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 3rd January 2019 to 24th December 2019 tests are negative for Escherichia coli 0157:H7.

The latest E.Coli 0157:H7 results from the 3rd January 2019 to the 24th Dec 2019 are listed below. We operate one hot boning room which is sampled every day it is in operation.

Lots sampled	Cartons sampled*	Lots positive
198	2376	0

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The latest six other serogroups of Shiga Toxin-producing *E. coli* (O26, O45, O103, O111, O121 and O145) results from the 3rd January 2019 to the 24th Dec 2019 are listed below. We operate one hot boning room which is sampled every day it is in operation.

Lots sampled	Cartons sampled*	Lots positive
198	2376	1

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 O157: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 82°C 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.

All cattle are handled, held and slaughtered in a humane manner which complies with various New Zealand Animal Welfare Codes of Practise and country and customer Animal Welfare requirements.

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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. Animal welfare is subject to both internal and 3rd party audit.

Routine specie sampling to verify beef only species with no traces of any other non-beef protein or DNA is conducted by the Ministry of Primary industries (MPI). ME82 is a bovine only processor.

Yours faithfully,

Terry McCarvill
Technical Manager

Greenlea Premier Meats Limited

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Colin Wicken

From: Elena Badeeva (ebadeeva@rachisholm.com) <ebadeeva@rachisholm.com>
Sent: Tuesday, 31 December 2019 2:40 AM
To: Colin Wicken
Subject: Greenlea plants - updated HACCP Letters

Good morning, Colin!

Merry Christmas!

Could you please send me updated HACCP Letters (Letters of Guarantee) for 2020:

GREENLEA, Morrinsville [link]	ME 82
GREENLEA, Hamilton [link]	ME 124

Thank you and best regards,

ELENA BADEEVA

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Our banking information never changes. If this is in question please call by phone to confirm.

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