

Te Kuiti Plant
Waitete Road
PO BOX 408, Te Kuiti
Telephone: 64 7 878 8926
Facsimile: 64 7 878 8936

08 January 2018

RE: Letter of Guarantee ME127

To Whom It May Concern,

As ME127 is a US listed establishment a thorough reassessment was carried out and it was concluded that ***Escherichia coli* 0157:H7 and Shiga Toxin-Producing *Escherichia coli* (Non-O157 STEC) is not a hazard likely to occur**. This conclusion has been documented in the establishments HACCP plan and approved by Ministry for Primary Industries otherwise known as New Zealand Food Safety Authority.

New Zealand's hygienic slaughter and dressing requirements ensure that processing is carried out in a manner that minimises contamination and produces a product fit for intended purpose. These practices further reduce the presence of any microbiological contamination. For example:

- Pasture fed animals
- Potable water wash pre slaughter (cattle only) All of these cattle are accompanied by an Animal Status Declaration signed by the owner declaring they are free from chemical Residues.
- Ante-mortem inspection of all animals by MPI VS prior to slaughter
- Hygienic slaughter and dressing – equipment sterilisation between carcasses prior to inspections is carried out at $\geq 82^{\circ}\text{C}$
- Sealing of oesophagus/weasand with clips
- Sealing of bung with a plastic bag and elastrator ring
- MPI approved SSOPs/Pre requisite programmes
- Process monitoring by trained competent supervisory staff on a run to run basis
- Trimming of visible contamination
- Market Access Critical Control Point (CCP) to ensure Zero Faecal. This meets the FSIS "US Pathogen reduction/HACCP final Rule"
- Validated refrigeration parameters to control microbial growth
- Control Point at pre trim to ensure Zero faecal and SRM removal prior to boning.
- Full time veterinary presence onsite for verification of process and certification
- Operators trained and competent in assigned tasks.
- Post mortem inspection carried out by Independent MPI Inspectors
- Packaging methods to minimise bacterial growth
- Robust verification programmes (internal, external and extrinsic verification)

Our premises ME 127 has participated in the National Monitoring Programme for ***Escherichia coli* 0157:H7** for premises exporting beef to the United States since June 1998. Additionally, from 4 June 2012, our premises 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).

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 International Accreditation New Zealand (IANZ), and attain the accreditation as an “IANZ Accredited Laboratory” 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.

New Zealand has a test and hold protocol, this means that product is not exported until a negative result is received from an IANZ Accredited Laboratory.

There have been no incidences of E coli 0157:H7 illness associated with consuming New Zealand Beef products.

Yours sincerely



Juanita Morgan
Technical Compliance Manager
UBP Limited (ME127)
07 878 8926 ext609