



8th January 2021

2021 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).

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We operate two boning rooms, each one is tested separately every day it is in operation. The test results for the 2020 processing year from 6th January 2020 to 24th December 2020 are as follows:

Boning room	Lots sampled	Cartons sampled	<i>E.Coli</i> O157:H7 positive	STEC positive
Hot Boning	257	3,084	1	2
Prime boning	302	3,624	0	0
Total	559	6,708	1	2

* *Note: 2 production lots positive, rather than 3, as one lot was positive for both *E.Coli* O157:H7 and STEC.*

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;

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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;
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. 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 Practice and Country and customer animal welfare requirements. Non ambulatory animals are either condemned in yards or if processed are ineligible for export.

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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