

US Supply Letter of Guarantee

Greenlea Premier Meats Ltd Establishment ME82

1. Establishment Registration.

New Zealand export operations are conducted under the regulatory controls of the Ministry of 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 overseeing 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 ME82 is USA listed and operates under an MPI Risk Management Program (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 CCP's 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, 0103, 0121 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:

Likely to occur

OR

Not likely to occur

(Please tick).

The reassessed HACCP Plan reviewed all steps in the process including the following interventions:

- Ante mortem on all livestock pre-slaughter by competent government officials
- Identification and management of ill or injured livestock
- Non-ambulatory livestock are segregated and humanely slaughtered as prohibited for export to the United States or Canada
- Cattle assessed for cleanliness for slaughter
- Highly trained operators
- After stunning -sealing of weasand by application of a clip/plug to prevent spillage
- Sealing of the bung via bagging to control cross contamination
- Line speeds appropriate to providing adequate time for hygiene inspections and dressing of the carcass

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- Sanitising hands and equipment between carcasses for high risk activities
- Knife sterilisation between carcasses
- All carcasses are subjected to a final inspection and hygiene trim
- Zero tolerance is in place for faecal contamination
- Chilling and freezing regimes to control microbial growth
- Product hygiene is monitored daily
- Documented Corrective and Preventative actions are in place and followed
- Microbial testing of contact surfaces and product

3. Verification *E coli* O157:H7

Sampling

To verify the ongoing effectiveness of these interventions Establishment ME82 conducts sampling and testing of Beef Trimmings for *E coli* O157:H7 as per the approved FSIS monitoring programme.

Twelve cartons (27.2kg) of beef are randomly selected each day from each FSIS premise. A composite N60 sample is collected from multiple locations within the selected cartons, and composited (375g) for analysis.

In the past 12 months Establishment ME82 has collected samples for 2364 tests with 0 positives for *E coli* O157:H7 and 0 positive for O26, O45, O103, O111, O121 and O145.

Hold and Release

All product is subject to a 'Test, Hold and Release' sampling procedure. Only product that has complied with the HACCP requirements and returned negative test results for *E coli* O157:H7 are released for shipment.

Laboratory

Samples are tested by an ISO17025 third party accredited laboratory to conduct testing of meat products for *E coli* O157:H7

Testing

Analytical methods meet the requirements of FSIS Directive 10010.1.

Screening tests for *E coli* O157:H7 are performed using AOAC approved Bio-Control Assurance GDS kits for *E coli* O157.

Potential positive results are confirmed using (IMS) procedures.

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.

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

Yours faithfully,

Terry McCarvill
Technical Manager

Greenlea Premier Meats Limited