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Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
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Dear Sir / Madam

#### **Submission – Review of Microbiological Criteria**

Thank you for the opportunity to provide a submission on the Call for Submissions paper for the Review of Microbiological Criteria.

This submission provides technical advice and comments related to this issue. It was prepared with the advice of officers from Safe Food Production Queensland (SFPQ) and the Queensland Department of Agriculture and Fisheries. (DAF). The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government should notification be made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

SFPQ are responsible for implementing Chapter 4 of the Food Standard Code in Queensland and regulate the production and processing of food under meat, seafood, egg, horticulture (sprouts only) and milk food safety schemes. The Department of Health is responsible for enforcement and compliance activities in relation Chapters 1 and 2 of the Food Standards Code. Comments from officers of each agency are presented below.

#### **COMMENTS FROM Safe Food Production Queensland**

As noted by FSANZ the application of microbiological criteria as it relates to food safety management has moved away from a reactive approach (e.g. end product testing) to a preventative approach applying to process controls. For this reason SFPQ supports FSANZ's ongoing review of microbiological criteria. SFPQ's advocates a system approach through chain with appropriate barriers, which are monitored consistently with system errors and corrective actions taken by the business reported to SFPQ (i.e. notification system), which are then verified by SFPQ. Hence testing products in the market place is considered to be of limited value unless it

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is part of a well-directed plan to verify an outcome. Results whether positive or negative from any form of testing have to be interpreted and explained in a context that re-enforces responsibility for food safety. This approach is consistent with current government policy on reduction of red tape and is a suitable way of encouraging adaptable production systems and minimising impost on businesses that have to comply with regulation.

Given this approach, SFPQ supports the inclusion of food safety criteria and process hygiene criteria in the Code. However, given the nature of the changes to the Code resulting from the *Listeria monocytogenes* review SFPQ is concerned that similar amendments for a wide range of commodities and pathogens may result in a complex standard with many businesses experiencing increased costs by way of validating compliance with the limits, as well as creating challenges for food safety regulators to efficiently verify compliance with the Standard by businesses.

## COMMENTS FROM THE DEPARTMENT OF HEALTH

Part of the role of Queensland Health is to enforce compliance with Chapters 1 and 2 of the Code and ensure food sold is safe and suitable under the Queensland *Food Act 2006*. Queensland Health investigates complaints about the safety and standards of food, investigates food borne illness outbreaks, and conducts monitoring and surveillance programs including microbiological sampling surveys. Risk assessment activities are carried out in relation to the safety of food and as such Queensland Health may determine the need for food recalls and provide advice on the whether foods are safe and suitable under the *Food Act 2006*.

As such, assessing the microbiological safety of food offered for sale and that has been sold to consumers is an important role of the Department. The current microbiological requirements in the Code are regularly used. Just as important the FSANZ *Guidelines for the microbiological examination of ready-to-eat food* requirements underpin the reporting of microbiological results by the Department's Public Health Microbiology Laboratory.

Sampling of foods to monitor and verify food safety controls (i.e. process hygiene criteria) forms only a small proportion of all samples food samples obtained by Queensland Health because the main focus is on assessing the safety of food and informing food borne illness outbreak investigations. However, a number of surveys and foodborne illness outbreak investigations have been undertaken in relation to *Campylobacter jejuni* which have involved the testing of raw chicken meat.

It appears that a reduction in the level of contamination of raw chicken meat with *Campylobacter* results in a corresponding reduction in cases of campylobacteriosis. Due to ongoing high levels of campylobacteriosis in the community, officers from the Health Protection Unit of Queensland Health support the inclusion in the FSANZ review work to establish suitable minimum legislated process hygiene criteria for campylobacter in raw chicken. The establishment of an acceptable level of campylobacter contamination that all poultry processors must comply with could have a very significant effect on reducing the incidence of campylobacteriosis in Australia.

A significant proportion of microbiological samples taken by Queensland Health are environmental swabs from kitchens to identify possible environmental sources of microorganism such as *Listeria monocytogenes*.

While microbiological surveys are undertaken by Queensland Health the majority of samples submitted relate to investigations in to the safety of food and suspected food borne illness. As such tests undertaken will include microbial indicators such as total plate count, coliforms and E.coli as well as common microorganisms and microbial toxins associated with food borne illness such as *Salmonella* spp., *Listeria monocytogenes*, *Staphylococcus aureus*, Staphylococcus enterotoxin, *Bacillus cereus* (including enterotoxin), *Clostridium perfringens*, et cetera. In addition tests may be undertaken for viruses associated with outbreaks such as norovirus and other

viruses associated food and human illness. Generally the tests undertaken will be selected based on symptoms, incubation periods, and likely food source.

Foods mostly tested will be ready-to-eat foods but any of the foods currently listed in standard 1.6.1 of the Code could be tested. Foods commonly tested include milk, cooked deli style meats, and soft cheeses.

The use of microbiological limits in assessing food safety risks is more challenging when the level of contamination of the food is of marginal microbiological quality. In such cases other factors will be considered, for example remaining shelf life of a product.

Queensland Health has a mandatory notification requirement under the *Food Act 2006* that requires laboratories and businesses that send food outside Queensland for testing to notify the Department if any of the following pathogens are isolated in food (other than raw meat, except cured, dried or smoked meat or uncooked fermented meat):

- Campylobacter jejuni
- Clostridium botulinum
- Listeria monocytogenes
- Salmonella (any species)
- Shiga toxin-producing Escherichia coli (STEC)
- Shigella (any species)
- Yersinia enterocolitica (pathogenic strains only).

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Health Protection Unit, Department of Health on (07) 3328 9310 or at [foodsafety@health.qld.gov.au](mailto:foodsafety@health.qld.gov.au)

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