

27 February 2015

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610
AUSTRALIA

Via email: submissions@foodstandards.gov.au

CONFIDENTIAL

Dear Standards Manager

RE: FSANZ CONSULTATION ON COMPLETING THE REVIEW OF MICROBIOLOGICAL CRITERIA

Thank you for the opportunity to comment on the above consultation.

Coles understands that the existing microbiological limits in Standard 1.6.1 of the Australian and New Zealand Food Standards Code (**the Code**) and associated guidelines have been in place since 2000 and that there has been significant developments in food safety management since then.

Given these developments, Coles supports the proposed use of microbiological criteria and process hygiene criteria to ensure consistency of approach by the food industry and regulators.

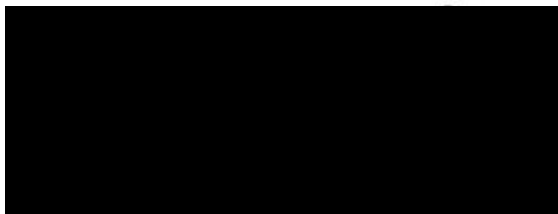
We note that the current approach (where nothing is specified for certain foods under the Code) can result in inconsistencies in enforcement approaches. For example, some regulatory or government authorities may develop their own guidelines such as the NSW Food Authority Food Safety Schemes Manual, or use overseas guidelines as a substitute such as those in NZ, UK, USA, EU etc. We note that in some cases historical guidelines beyond the scope of which they were intended have also been applied. A recent example of the latter has been a local council using Meat Standards Committee guidelines (developed in 2002 and intended for process monitoring by abattoirs on carcasses and boxed meat) and extending the scope to categorise the total plate count of vacuum packed retail meat samples near the end of shelf life.

Coles supports alignment with the internationally recognised Codex approach to setting microbiological criteria. In particular, we support further clarification on the specified point in the food chain where it is applied and the corrective action when limits are not met.

Coles also respectfully suggests that FSANZ should consolidate the current array of documents where various limits/guidelines currently exist - microbiological limits (Standard 1.6.1 of the Code), additional microbiological 'guideline criteria' (User guide to Standard 1.6.1) and the guidelines for the microbiological examination of ready to eat foods. Most of these documents are well over 10 years old now and need to be refreshed and updated to reflect the latest knowledge.

Thank you for the opportunity to provide comment on the above consultation. If you require further information please contact [REDACTED].

Yours sincerely



General Manager Quality Control