



12th November 2012

Project Manager Proposal P1017
Food Standards Australia New Zealand

Re: Unilever Australia Submission in response to Proposal P1017 – Criteria for *Listeria Monocytogenes*- Microbiological limits for foods

Dear Project Manager

Unilever welcomes the opportunity to provide comment to the FSANZ proposal - Criteria for *Listeria Monocytogenes*- Microbiological limits for foods.

Unilever supports option 1 - to include limits in Standard 1.6.1 for *L.monocytogenes* on the basis of whether the food is ready-to-eat and can or cannot support its growth.

Option 1 reflects the approach adopted by the Codex Committee on Food Hygiene (Codex 2007) and is more closely aligned with NSW Food Authority limits (Food Safety Schemes Manual). Unilever has previously received conflicting information between FSANZ and the NSW Food Authority regarding microbiological limits for *Listeria Monocytogenes*. We are therefore pleased to see a more harmonised approach between FSANZ and the NSW Food Authority and believe this option provides clarity in defining ice cream as a “no growth” product based on frozen storage. The proposed limit of 100 cfu/g protects consumers whilst providing consistent and practical limits for ice cream manufacturing.

Should you require any further information in relation to ice cream to inform this proposal, please do not hesitate to contact me directly.

Yours sincerely,

Lucy Pearson
Assistant Regulatory Manager
Unilever Australasia
[Redacted Signature]