OneHarvest Submission

Proposal P1015

Criteria for Listeria Monocytogenes - Microbiological Limits for Foods

November 2012

OneHarvest is a 100% Australian-owned provider of value-added fruit and vegetable products and fresh fruit to supermarkets and greengrocers around Australia.

We operate the Harvest FreshCuts and the Vegco salads businesses, which source fresh ingredients including lettuce, spinach, rocket, herbs, cabbage, kale, chard, tatsoi, watercress, beetroot, parsley, coriander, snow peas, celery, spring onions, capsicum, cherry tomatoes, onions, cauliflower, zucchini, carrots, broccoli, corn and potatoes from independent grower partners located throughout Australia.

Our product range includes bagged leafy green salads, stir fry mixes, premium value-added salads with dressings and other ingredients such as pasta. More than 220,000 packs of these salads and stir fry mixes are processed daily at plants in Brisbane, Bairnsdale (Victoria) and Perth.

We deal with approximately 100 independent growers throughout Australia.

Business turnover is approximately $120 million per annum and we are a major manufacturer in this area of the food industry.

This submission is a response to the call for submissions relating to the Proposal P1017, the *Criteria for Listeria Monocytogenes – Microbiological Limits for Foods).*

This proposal was prepared by Food Standards Australia New Zealand. We thank FSANZ for the opportunity to provide comment and commend it for its consultative planning processes.

One Harvest fully supports aligning Australia and New Zealand with international learnings in this area.

Listeria control is a significant challenge in our industry due to two key factors:

1. The key raw materials we source are grown in a Listeria-rich environment (field grown, above ground and close to ground crops). Listeria is a particular challenge during periods of heavy or extended rain.
2. Our process does not have a 'kill' step for pathogens. Our methods of control are cool chain, shelf life and sanitisation using peroacetic acid. Although these are effective at reducing loading and multiplication of bacteria, they are not an effective kill step.

These factors result in us sometimes experiencing challenges with Listeria Monocytogenes at low levels. Therefore any proposed changes to the legislation are of particular interest to us.

Review of Proposal Options

OPTION 1: to include limits in Standard 1.6.1 for L.monocytogenes on the basis of whether the food is ready to eat or can or cannot support its growth

Our products would be classified as ready to eat under the proposed definitions.

Most of our products would be classified as able to support growth, which would mean a *Not Detect in <25g* would be the criteria.

Our challenge with this is that, based on over 10 years of testing history across multiple processing sites, we intermittently experience L.mono counts due to the nature of our raw materials and process capability. Almost always counts are at <10cfu/g. On retest at end of life (which is an average of 7-8 days) we would never exceed 100cfu/g. To support this assertion, some testing statistics are detailed below for the last four financial years.

Therefore, we would like to propose Option 1 be reviewed, to allow validation for ready to eat foods with short shelf life and no kill step capability to prove that despite presence of low levels (<10cfu/g) (which will inevitably be present even after good sanitation practice from time to time) the product cannot exceed 100 cfu/g at point of consumption, therefore posing no consumer risk. This validation could be done through controlled spiking trials.

Microbiological Testing Statistics to support Submission

Year	Estimated no. of L.mono tests performed	No. of L.mono detections	No. > 10 cfu/g	No. > 100 at end of life
2011/2012	2000	15	0	0
2010/2011	2020	20	0	0
2009/2010	2167	22	0	0
2008/2009	2317	30	4	0

OPTION 2 – to delete the limits for L.mono in Standard 1.6.1 and establish reference criteria for L.mono in ready to eat food on the basis of whether it can or cannot support its growth

We would support this option as an alternative to the proposal versus Option 1 above.

As stated above, it is not feasible for our types of products and processes to achieve a *Not detected in 25g* (<0.04cfu/g) 100% of the time.

We also believe that this approach has the potential to reduce the overall incidence rate of L.monocytogenes food poisoning in Australia and New Zealand, through providing support in educating and guiding the collective food industry in best practice controls on L.monocytogenes.

OPTION 3 - No amendments to current limits in Standard 1.6.1 (status quo).

We would not support this option due to the reasons given above in commentary under Options 1 & 2.

Currently, if we detect any L.mono in product, we experience two key issues with the way the legislation is being interpreted and executed across states and territories:

1. Depending on where our customers' head offices are based, the specifications they agree with us are different for L.mono (one customer is <10cfu/g, one customer is *Not detected in 25g*). It would be significantly easier and more efficient for us to work off one specification limit.
2. If we do detect any L.mono in product, different approaches are taken depending on which State Health Authority is informed. Some states accept that a <10 count is unlikely to pose any consumer risk and simply require an investigation. Some states take the approach that any detection should warrant a recall, irrelevant of shelf life, enumeration and true risk to the public.

As a manufacturer who wants to ensure that we do everything we can to ensure food safety of our products, these factors make it a little unclear as to the approach we should be taking, particularly in light of our product challenges.

We appreciate your time in considering this submission and if you require any further information please do not hesitate to contact us.