Submission on

Proposal P1017. Criteria for Listeria monocytogenes – Microbiological Limits for Foods

I would like to submit the following thoughts about the proposed changes from a testing laboratory's perspective.

In my opinion there are two areas of concern.

The first is in the definition of a food product which will not support the growth of L. monocytogenes. Who will make this decision? This laboratory frequently sees innovative food products that may or may not fall into this category, but which are not exactly within the suggested list. Unless the laboratory carries out validation of the culture method on these products there is no way that the manufacturer can be sure of the status of the product. This would be a significant additional charge to the manufacturer.

Secondly the very low limit of 100cfu/g puts the laboratory in the position of perhaps having to put a manufacturer into recall mode on the presence of only one colony too many on culture plates.

This laboratory uses a method based on the ISO method for enumeration. Three agar plates are spread with 0.3, 0.3 and 0.4 mL of a 1;10 dilution of product. This is done in duplicate. Colony counts of 3 on each plate would give a total of 90cfu/g. Should any two of the six plates have 4 colonies then the count is 100cfu/g, a fail. Obtaining reproducible results at this level using this methodology is, at best, difficult.

While I appreciate that one out of five samples is allowed to be over this limit, the reality is that many small manufacturers do not submit five samples per batch of product for testing as the cost of testing by the enumeration would be prohibitive. A composite presence/absence test is much more affordable.

The status quo for these manufacturers would I feel still be the best option both from a processing and financial perspective. Manufacturers should be encouraged to keep Listeria out of their premises and processes. It would also relieve the laboratories from having to make decisions that could drastically affect manufacturers based on marginal data obtained from a method at the limits of its accuracy.

If however these proposals are pushed through it would be appreciated if specific methodology was nominated to be performed by accredited laboratories.

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