

## **SUBMISSION FOR APPLICATION A1045 – Bacteriophage preparation P100 as a processing aid (2<sup>nd</sup> Assessment)**

### **Food Policy and Programs Branch, SA Health**

**27 April 2012**

Thank you for the opportunity to provide comments to the 2nd Assessment Report for A1045.

SA Health has the following concerns regarding this application, some of which were raised previously.

#### **Safety**

It is considered that FSANZ should take into account the following information from EFSA published subsequent to the publication of the 2<sup>nd</sup> Assessment Report.

*Scientific Opinion on the evaluation of the safety and efficacy of Listex<sup>TM</sup> P100 for the removal of Listeria monocytogenes surface contamination of raw fish.* EFSA Journal 2012;10(3):2165. [42 pp.] doi:10.2903/j.efsa.2012.2165. Available online: [www.efsa.europa.eu/efsajournal](http://www.efsa.europa.eu/efsajournal) © European Food Safety Authority, 2012

This information concludes that ‘naturally occurring P100 Listeria resistant variants might be selected as a consequence of the use of Listex<sup>TM</sup> P100’ – raising the question of whether there is potential for resistant strains to develop.

In answer to this question at 1<sup>st</sup> assessment, FSANZ responded that ‘self regulation is likely to be effective in ensuring resistance development does not occur since it is in the interest of both parties to ensure efficacy’ (page 15 2<sup>nd</sup> Assessment Report). The EFSA research indicates that resistance may be a real issue and the effectiveness of this treatment should therefore be monitored carefully.

#### **Editorial Note to clarify a solid food**

The editorial note does not adequately clarify what is considered to be a solid food and needs to be refined.

“Foods that are solid hold their shape and do not flow when placed on a flat surface such as a table. An example of a solid food is a cut melon. Fruit purée, on the other hand, would not be considered a solid food.”

A food that is solid at the time of application may be a liquid or semi-liquid depending on the temperature of the surroundings. For example, a ready to eat frozen dessert, would be a solid at low temperature. A number of foods when placed on a flat level table will hold their shape and not flow in the first instance, but over a longer period of time there may be changes in shape and flow rate.

**Categorisation of P100 as a processing aid**

Other biological organisms such as yeasts, fungi (eg *Penicilium* in cheese) and bacteria (eg Starter cultures, probiotics and natural flora) are considered to be food by the Food Standards Code and are not listed in the Food additive standard or the Processing aids standard. To be consistent, P100 may be considered as a food since it also is a biological organism.

If P100 is considered as a food, then the novel food standard may apply and this would require its pre-assessment approval. It is noted that the definition of novel food in the novel food standard is proposed for removal in the FSANZ Consultation paper on nutritive substances and novel foods.

Food may be used as processing aids without being listed specifically in the processing aid standard. If P100 is present in a food product as a food or food additive, it would require labelling in the ingredient list.

**Labelling**

As previously stated in the SA Health submission to the 1<sup>st</sup> assessment report, it is considered that, despite P100 being assessed as a processing aid, there may be consumer expectation that food using this new technology is labelled to indicate the use of bacteriophages in their preparation.

The use of a live organism is unprecedented in Standard 1.3.3 and supports an individual approach to labelling. Consideration should therefore be given to labelling food products that have used this new method of treatment.

Food Policy and Programs Branch  
SA Health  
PO Box 6 Rundle Mall SA 5000