FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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SUBMISSION

26 October 2011

Attention: **Project Manager – Application A1045**

Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia, 2610.

Re: Bacteriophage Preparation P100 as a Processing Aid – 1st Assessment Report

FTA Australia has reviewed this Application and endorses the following comments of the Technical Sub Committee:

The Committee agreed with Option 2 – to prepare a draft regulatory measure BUT NOT as Processing Aid and offer the following comments:

1. The product Bacteriophage P100 should be treated as a Food Ingredient, most probably as a Food Additive in Standard 1.3.1.

2. In the FSANZ "Reasons for Preferred Approach" it states "P100 has a technological function as a processing aid". Standard 1.3.3 requires that a Processing Aid fulfills a 'function" or a "technological purpose" which are consider quite separate from the "Technological Functions" which are in Standard 1.3.1 Schedule 5 and ONLY apply to Standard 1.3.1 Food Additives. A Processing Aid does is not permitted to have a "technological function" or if a substance has a "technological function" as per Schedule 5, then it must be a Food Additive.

3. In the Executive Summary it states:
   "Furthermore, the weight of evidence, coupled with the restricted functionality of the bacteriophage in commercial conditions and in non-liquid food matrices, supports the conclusion that P100 has no ongoing technological function in non-liquid ready-to-eat food according to the use and levels proposed by the Applicant."
   Does this mean that once the Bacteriophage eliminates or reduces the initial load of Listeria *monocytogenes* that it suddenly loses its viability? This would appear contradictory to other statements made in this Application.

4. It was noted that Bacteriophage P100 is present and viable on the food through out its expected shelf life and would continue to be active if *Listeria monocytogenes* was reintroduced after opening or through recontamination or cross-contamination, for examples. Thus its primary function is still active whereas in the case of many Processing Aids, these are either inactivated during processing or have no function in the final ready-to-eat food.

5. As there are several types of *Listeria* that are not reportable if found to be present, is the Bacteriophage also effective against other strains of *Listeria* other than *monocytogenes* or is it completely specific?

6. The Application states:

   "The P100 bacteriophage species could be updated as necessary, to maintain efficacy, while conforming to the specification."

   This leaves it up to the supplier to alter the species and/or characteristics required to maintain efficacy. This is concerning, as presumably the Applicant has put forward the safest possible option to gain regulatory approval. As it is not revealed what is in the specification, but if they can alter species and characteristics overtime it could become an issue, depending on how well the specification is defined. Would the Applicant have to initiate a fresh Application to FSANZ if the specification was amended?

7. The logic used is that the application is for solid food only. The bacteriophage binds to the surface of the solid food and cannot move and thus will only kill those bacteria near it. Once they are dead the phage is no longer active (no more bacteria) although it survives (for at least 6 days) and thus will kill any new bacteria that landed in its sphere.

8. As the Bacteriophage P100 is applied to the food through a spraying or dipping process, it is assumed that the food has a uniform covering and with a reasonable viable period, this Bacteriophage will still be capable of activity after the initial period of, particularly, only reducing *Listeria monocytogenes* which may recontaminate and multiply on the product surface.

9. It is also considered that consumers may believe they are being deceived by the non-labelling of this product as a Processing Aid.

10. Overall, FTAA believe that Standard 1.3.1 – Food Additives would be the most appropriate categorisation for this substance.

If there are any queries regarding this submission, please contact the Technical Secretary, Tony Zipper, Telephone (03) 9532 8213, Fax (03) 9532 8213, Mobile 0409 324 075, E-mail tzipper@dodo.com.au .

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this Application.

Yours sincerely,

Paul Habojan
PRESIDENT – FTA AUSTRALIA