

Comments from the Victorian Departments of Health and Human Services, and Economic Development, Jobs, Transport and Resources, and PrimeSafe.

Due date of submission: 10 August 2016

The Victorian Departments of Health and Human Services and Economic Development, Jobs, Transport and Resources (the departments) and PrimeSafe welcome the opportunity to provide comments on Application A1113, Extension of the use of propionates in processed meats.

From the FSANZ assessment report it is understood that:

- The Applicant is seeking permission to extend the use of propionates, as an anti-microbial preservative, to processed meat products.
- The proposed use of propionates would enhance, not replace, good manufacturing practices or nationally agreed regulatory or compliance procedures.
- Propionates have been shown to be particularly effective for inhibiting growth of *Listeria monocytogenes* in processed meat poultry and game, at low levels of use.
- Propionates (propionic acid and its sodium, calcium and potassium salts) have a long history of safe use as food additives. They are currently permitted by the Code to be added as preservatives to a broad range of foods including breads, pastries, fruit and vegetable juices, jams and toppings.
- The Joint FAO/WHO Expert Committee on Food Additives has concluded that there is no evidence of systemic toxicity resulting from oral exposure to propionates. Establishment of an acceptable daily intake (ADI) was therefore not required and the level of addition relies on good manufacturing practice (GMP).
- The Codex Alimentarius General Standard for Food Additives permits the addition of propionates at GMP to the processed meat products identified in A1113.
- The US Food and Drug Administration permits the use of propionic acid and its sodium salt as preservatives in ready to eat meat and poultry up to a level of 500 mg/kg.
- The application is justified on the grounds that it will provide an efficacious anti-microbial alternative for food businesses to limit the growth of *Listeria monocytogenes* in a range of processed meat products.
- The products manufactured using propionates will still need to meet the regulatory guidelines for *Listeria monocytogenes*. If manufacturers rely on propionates to claim their products will not support the growth of *Listeria monocytogenes* then this will need to be able to be substantiated for the appropriate Code requirements to apply.

On the basis of the information provided, the departments and PrimeSafe support progression of Application A1113.