

Peters Ice Cream

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Standards Management Officer
Food Standards Australia New Zealand
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Email: submissions@foodstandards.gov.au

Dear Sir/Madam

PROPOSAL P1017 Criteria for *Listeria monocytogenes* – Microbiological Limits for Foods

Peters Ice Cream welcomes the opportunity to make a submission to Food Standards Australia New Zealand (FSANZ) on the Discussion Paper P1017 Criteria for *L. monocytogenes* – Microbiological Limits for Foods.

Peters Ice Cream supports the review of the limits for *L. monocytogenes* in Standard 1.6.1 – Microbiological Limits for Food in the FSANZ code and supports Option 1, to include limits in Standard 1.6.1 for *L. monocytogenes* on the basis of whether the food is ready-to-eat and can or cannot support its growth.

Peters Ice Cream supports Option 1 based on the following:

- This option reflects international guidelines (both Codex and FDA) for the management of *L. monocytogenes*
- It reduces trade barriers for the importation of food into Australia, and export of food from Australia and New Zealand

Definition:

Peters Ice Cream support the use of the Ready-to-eat definition used in Codex as 'any food which is normally eaten in its raw state or any food handled, processed, mixed, cooked, or otherwise prepared into a form which is normally eaten without further listericidal steps'.

It is important that any definition used in this standard should be consistent with definitions used in other Standards.

Growth or no growth:

Peters Ice Cream supports the sampling plan given in Option 1 which is aligned with Codex CAC/GL 61-2007, and supports the use of the control factors listed in Option 1.

Peters Ice Cream would support the development of risk based guidance documents based on Codex to help producers understand what foods can or cannot support the growth of *L. monocytogenes*.

Methods of Analysis:

Peters Ice Cream strongly supports the inclusion of the analytical test method in Standard 1.6.1, along with limits. It is strongly recommended that the analytical test method specified be aligned with the same ISO standards referenced by both Codex and FDA to help facilitate import and export trade.

Information from Section 4 Microbiological Criteria for *L. monocytogenes* in Ready-to-eat Foods in Codex CAC/GL 61-2007 could be used as a guidance document to help interpret results from *L. monocytogenes* testing.

Yours sincerely

Margaret Harrington
Quality Assurance Manager