

Australian Food and Grocery Council SUBMISSION

NOVEMBER 2012

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:
P1017 CRITERIA FOR *LISTERIA monocytogenes* –
MICROBIOLOGICAL LIMITS FOR FOODS

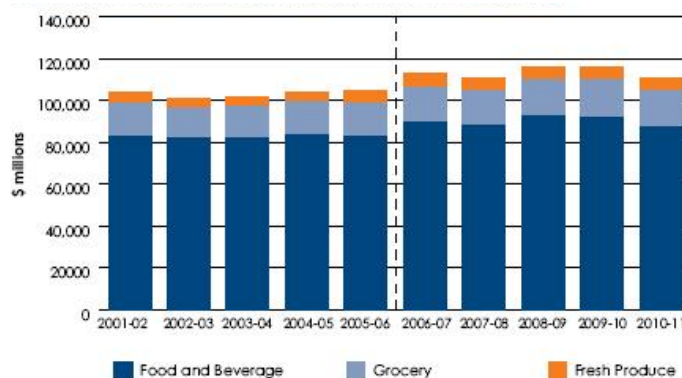


Australian Food and Grocery Council

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

Figure 1. Composition of the industry's turnover (\$2010-11)



Source: Based on ABS, catalogue number 8221.0 and 8159.0

With an annual turnover in the 2010-11 financial year of \$110 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

This diverse and sustainable industry is made up of over 22,600 businesses and accounts for over \$49 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. The industry spends \$466.7 million a year on research and development.

The food and grocery manufacturing sector employs more than 296,300 Australians, representing about 3 per cent of all employed people in Australia, paying around \$11.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia². It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

² About Australia: www.dfat.gov.au

1. INTRODUCTION

The Australian Food and Grocery Council (AFGC) welcome the opportunity to make this submission to Food Standards Australia New Zealand (FSANZ) in response to the call for submissions – Proposal P1017 Criteria for *Listeria monocytogenes* – Microbiological Limits for Foods.

AFGC notes the intent of this proposal is to review existing limits for *L. monocytogenes* in Standard 1.6.1, taking into account agreed international criteria developed for *L. monocytogenes* in ready-to-eat (RTE) foods.

This submission is in two parts:

1. Overall position and recommendation; and
2. Specific comment on matters in the call for submissions paper.

2. OVERALL POSITION

The AFGC **supports** a review of the microbiological limits for *L. monocytogenes* to address the issues that have been identified with the current limits in the Code and to bring the criteria into line with the approach agreed internationally (through Codex) for ready-to-eat foods.

The AFGC **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.

The AFGC supports the development of a comprehensive set of advisory or reference criteria on the basis of whether the food can or cannot support the growth of *L. monocytogenes*.

3. SPECIFIC COMMENTS

3.1. Support for Option 1

The AFGC considers that Option 1 proposed by FSANZ reflects the most recent international consensus for the management of *L. monocytogenes* in the food supply and will reduce trade barriers for products which are imported or exported from Australia and/or New Zealand.

AFGC consider it would be necessary for FSANZ to provide a guidance document on the specific criteria and characteristics that determine which foods can support the growth of *L. monocytogenes* and also those which do not support the growth of *L. monocytogenes*, with references to appropriate Codex documents.

As the scientific literature shows considerable divergence on the conditions under which a food can support the growth of *L. monocytogenes*, it is important that these criteria are defined to ensure clear guidance.

AFGC note the EU regulation 2073/2005 on microbiological criteria for foodstuffs contains the following:

- RTE foods intended for infants and for special medical purposes: $n = 10$ and $c = 0$

- For other RTE foods able to support growth of *L. monocytogenes*, other than those intended for infants and for special medical purposes: $n = 5$ and $c = 0$.

The Commission Regulation applies a more extensive sampling plan to foods intended for 'at risk' consumers, a concept that should be considered.

3.2. Definition of ready-to-eat-food

*FSANZ welcomes information or comment on existing definitions for "ready-to-eat" and specific considerations that may need to be taken into account when applying criteria for *L. monocytogenes* to this category of foods.*

AFGC support a review of the definition of "ready-to-eat" to ensure consistency within the Code and alignment with Codex.

AFGC support the Codex definition (below) although note that it makes specific reference to *L. monocytogenes* which may not be applicable for use in other areas of the Code, for example Standard 3.2.2.

"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."

3.3. Growth or no growth

*FSANZ welcomes information or comment on whether adequate guidance or tools are available for industry or enforcement agencies to validate whether a food can support the growth of *L. monocytogenes* or not.*

It is appropriate that FSANZ should provide clear guidance to industry irrespective of the available information - there is a large amount information available, some of which may be conflicting.

Guidance from FSANZ would provide clear direction to industry and enforcement agencies.

3.4. Methods of Analysis

FSANZ welcomes comment on the need to specify methods of analysis in the Code or whether other mechanisms can be used in order to ensure consistent application of microbiological criteria.

AFGC support alignment of methods of analysis with current Australian standards.

3.5. Option 2 – No limits in Standard 1.6.1

FSANZ welcomes comment on the role or need for regulatory limits in Standard 1.6.1 to ensure a safe food supply. Can reference criteria provide adequate support for enforcement agencies (and guidance to industry) to ensure food businesses produce safe and suitable food?

AFGC supports the development of a comprehensive set of advisory or reference criteria on the basis of whether the food can or cannot support the growth of *L. monocytogenes*.

The Codex Guidelines on the Application of General Principles of Food Hygiene on the Control of *Listeria monocytogenes* in Foods (CAC/GL 61-2007) provides this information and in fact, reference to the Codex document would also address the need to provide guidance on the conditions under which growth of *L. monocytogenes* will or will not occur in the food.

3.6. Additional Comments

AFGC recommend that FSANZ consider a review of Standard 1.6.1 in its entirety to bring it into line with current research and international approaches to management of safety across the food supply.

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Australian Food and Grocery Council

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- Nestle Australia Ltd
- Nutricia Australia Pty Ltd
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