



**Dietitians Association of Australia**

**Response to FSANZ on Proposal P1017**

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

**November 2012**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 5000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for better food, better health, and wellbeing for all. DAA is pleased to provide a response to this initial public consultation by FSANZ regarding P1017 Criteria for *Listeria monocytogenes* - Microbiological limits for foods.

Contact Person: Kate Paul  
Position: Professional Services Dietitian  
Organisation: Dietitians Association of Australia  
Address: 1/8 Phipps Close, Deakin ACT 2600

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[REDACTED]  
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DAA supports Option 1, i.e. "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". DAA agrees that this option will support a nationally consistent approach and international harmonisation. It also appears that this option would appropriately set different criteria for foods that can support the growth of *Listeria* and foods that cannot.

If option 1 is taken to change Standard 1.6.1 this may ensure a wider choice of foods for this community. DAA notes that 75% of listeriosis notifications were for people aged over 60, (page 5 of the Consultation Paper). While DAA is concerned that the risk to vulnerable residents of listeriosis is managed, it also considers that the menus of residential aged care facilities, hospitals and other institutions may be unnecessarily restricted. There is a high prevalence of malnutrition in the residential aged care setting, in the order of 40-70%<sup>1</sup>. This population therefore often require a high energy high protein diet to prevent and treat malnutrition, and to maintain immune function. A menu that has restricted food choices may hamper the ability to prevent malnutrition or to provide a high energy high protein diet to treat malnourished individuals.

## **Reference**

1. DAA (2009). Evidence Based practice Guidelines for the Nutritional Management of Malnutrition in Adult Patients Across the Continuum of Care. Nutrition & Dietetics. 66(s3):S1–S34. Accessed 2 November at <http://onlinelibrary.wiley.com/doi/10.1111/ndi.2009.66.issue-s3/issuetoc>