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Standards Management Officer
Food Standards Australia New Zealand
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Dear Sir / Madam

Submission – Consultation paper – Application A1111 – Bacteriophage S16 & FO1a as a Processing Aid

Thank you for the opportunity to provide a submission on the call for submissions regarding Application A1111 – Bacteriophage S16 & FO1a as a Processing Aid.

This submission provides technical advice and comments related to this issue. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government should notification be made by the FSANZ Board to the Australia New Zealand Ministerial Forum on Food Regulation.

Concern is raised that the proposed variation to the Food Standards Code will permit the bacteriophage preparation as an internal treatment of raw meat products. The proposed variation to the Food Standards Code lists the function for the preparation as “Reduce Salmonella species on or in raw meat during processing”. As drafted, it would not exclude the use of it in products such as mince, minced products (e.g. chicken nuggets), sausages, rissoles, manufactured meats, fermented comminuted meat products, pate, meat spreads, reformed meat products, et cetera. This means the assessment by FSANZ may not have assessed some issues.

If the bacteriophage preparation is to be permitted by the Food Standards Code for use *in* raw meat products during processing then the technological purpose need to be assessed. The Call for Submission paper and risk assessment discuss the use of the bacteriophage preparation as a surface treatment of carcasses, chicken breast, chicken skin, chicken drum stick and cuts of pork and beef. Use inside meat products is not discussed.

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An assessment should be undertaken of whether the bacteriophages may have some on-going technological function within some meat products such as mince. While not liquids, antimicrobial activity may increase when mince is mixed up at any time after it is made, for example, when portioning it to give to a customer in a butchery. Often minced and chopped meat products are sold in plastic bags and will be subject to some internal mixing as the bagged product is handled. Furthermore, bacteriophages on the surface of cuts of meat may have some ongoing effect when the packaging or other cuts of meat rub against them during handling by bringing the bacteriophages into contact with *Salmonella* cells. If there is any ongoing antibacterial effect then the bacteriophages could be considered food additives and not as processing aids. If this were the case, the bacteriophages would need to be listed as food additives in the Food Standards Code, and where appropriate listed on packaged meat products in the ingredients list.

In conclusion, the scope of the amendments should be restricted to the use of the bacteriophage preparation as a surface treatment of raw meat products during processing. Alternatively further assessment of the application of the bacteriophage preparation *in* raw meat products should be undertaken and a discussion included in the Final Assessment Report. The discussion would need to justify the use of the bacteriophage in raw meat products, including whether it classified as a food additive in certain circumstances.

Should you require further information in relation to this matter, please contact Food Safety Standards and Regulation, Department of Health on (07) 3328 9310 or at foodsafety@health.qld.gov.au

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