



SANFORD LIMITED
SUSTAINABLE SEAFOOD

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Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6143
NEW ZEALAND

To whom it may concern

Submission Proposal P1017: Criteria for *Listeria monocytogenes* – Microbial Limits for Foods

Sanford Limited as a major processor of ready-to-eat seafood supports the preferred approach taken by FSANZ to change to option 1, where limits the limits of *Listeria monocytogenes* on the basis of whether the foods is ready-to-eat and can support it's growth

The suggested change to option 1 is:

For foods in which the growth of *Listeria monocytogenes* can occur, a limit at end-of-shelf life should be considered, and for foods that don't support the growth of *Listeria monocytogenes* the same limit be applied at end of manufacture/point of sale.

We support the approach adopted by the Codex Committee on Food Hygiene (Codex 2007):

- criteria for foods in which growth of *L.monocytogenes* will not occur (<100 cfu/g)
- criteria for foods in which growth of *L.monocytogenes* can occur (not detected in 25g)

Definition of Ready-to-Eat Foods

We would support changes to Food Standards Code, Standard 1.6.1 if it only provided for a generic definition of Ready-to-Eat. The definition needs to take into account very minimally processed seafood products which do not undergo any form of listeriocidal processing, and are currently excluded from the *Listeria monocytogenes* criteria included in Food Standards Code, Standard 1.6.1.

In New Zealand, the *Listeria monocytogenes* requirements included in the Seafood COP do not apply to the raw seafood products, i.e.

- Raw fish (includes finfish, crustaceans, echinoderms, cephalopods and non-bivalve molluscan shellfish)
- Raw shellfish (includes all species of bivalve molluscan shellfish)

These products are predominantly sold chilled and have a short shelf-life, the risk of significant growth of the pathogen is minimal.

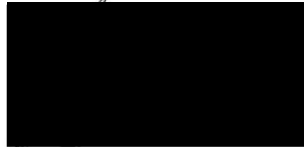
Growth or No Growth

The proposal indicates that identification of RTE foods in which growth of *Listeria monocytogenes* will not occur would be based on scientific justification and lists examples of factors that can control growth. We would support this proposal.

Methods of Analysis

We believe that the Food Standards Code Standard 1.6.1 should not prescribe methods of analysis to determine the level of microorganisms in foods for regulatory purposes. However we support the need to ensure that appropriate, valid methods are used for regulatory purpose analysis and therefore suggest that criteria for method selection be included in the standard.

Kind regards



Kim Thompson
Sanford Quality Manager