

SUBMISSION TO:
Food Standards Australia New Zealand

Regarding Proposal P1017
Criteria for *Listeria monocytogenes* – Microbiological Limits
for Foods

FROM:
The Australian Meat Industry Council
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Contact:

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ABOUT THE AUSTRALIAN MEAT INDUSTRY COUNCIL

The Australian Meat Industry Council (AMIC) is the recognised Peak Council in Australia representing the post-farm gate sector including export and domestic meat processors, smallgoods manufacturers, wholesalers, distributors, boning rooms and independent retail butchers.

AMIC is registered as an employer organisation pursuant to the provisions of the Fair Work (Registered Organisations) Act 2009.

AMIC has 2,300 members of which approximately 140 are classified as smallgoods manufacturers and 2,100 are retail butchers, many of whom make smallgoods products.

AMIC provides services to employers in the meat industry and these include advice on industrial relations, occupational health and safety, food safety and market access.

In Victoria, Tasmania and Queensland AMIC has a Food Safety Plan which is operated by most retail butchers and some abattoirs and smallgoods manufacturers.

ISSUES

This submission does not attempt to address each of the terms of reference in the review but provides an overall view of the treatment of *Listeria monocytogenes* in the manufacture and distribution of smallgoods.

FSANZ EXPOSURE PAPER P1017

The FSANZ proposal paper provides the background, the current standard and the reason for this review. An AMIC summary of this paper follows.

Standard 1.6.1 – Microbiological Limits for Food was included in the *Australia New Zealand Food Standards Code* (the Code) in December 2000. Since this Standard was developed, food safety requirements have been included in the Code supporting a preventative approach to ensuring food safety. Work has also progressed internationally to establish microbiological criteria for *Listeria monocytogenes* more broadly in ready-to-eat foods. The limits for *L. monocytogenes* in Standard 1.6.1 are being reviewed to provide a nationally consistent and internationally harmonised approach.

Internationally, through the Codex Alimentarius Commission (Codex), microbiological criteria have recently been developed for two categories of food:

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

Proposal P1017 will assess how this approach can be applied, both through amendments to Standard 1.6.1 and the development of guidance or other tools to assist industry and enforcement agencies. Particular matters to be clarified in this process include:

- definition of “ready-to-eat”
- establishing whether a food can or cannot support growth
- analytical methods.

Three options are being considered:

- 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.
- Option 2 – to delete the limits for *L. monocytogenes* in Standard 1.6.1 and establish reference criteria for *L. monocytogenes* in ready-to-eat food on the basis of whether it can or cannot support its growth.
- Option 3 – make no amendments to the limits in Standard 1.6.1 (status quo).

Proposal P1017 was prepared to address a number of problems that have been identified with the current limits for *L. monocytogenes* in the Code:

- Standard 1.6.1 product-by-product (vertical) approach to setting regulatory limits for *L. monocytogenes* has meant that other ready-to eat foods that may support the growth of *L. monocytogenes* may not be regulated equivalently.

There is an inconsistent approach between applying regulatory limits and guideline criteria. The limits in Standard 1.6.1 for generic product categories do not allow discretion as to whether the particular properties of a food support the growth or not of *L. monocytogenes*.

- Microbiological criteria should state the point in the food chain at which it applies, based on where maximum benefit is provided to the consumer that the food is safe and suitable for consumption.
- For certain foods, the testing of *L. monocytogenes* in the production environment as well as other stages in the production system may be required to manage *Listeria* in the food supply. The role of regulatory end point limits in this context was not considered when Standard 1.6.1 was developed.

AMIC SUPPORTS OPTION 1

AMIC 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.

REASONS FOR SUPPORTING OPTION 1

AMIC members have been operating under the zero tolerance requirements applied generally as a result of the current Standard 1.6.1. As a result the issues raised in the exposure paper have been an ongoing source of concern and have resulted in costly recall of products even where the level of listeria was low and the product will not support growth.

AMIC has cooperated with Meat and Livestock Australia (MLA) in a project to determine which products support the growth of listeria and which products will not support growth.

The project was based on the work of Mejholm and Dalgaard on the control of *L. monocytogenes* in fish referred to in the exposure paper. Their work, uses a predictive model containing eight factors which affect the lag phase and growth rate of listeria in fish products. The MLA project adapted this work to ready to eat meats and was able to demonstrate a similar outcome to that achieved originally by Mejholm and Dalgaard. The project considered the addition of anti listerial ingredients such as organic acids into current formulations for ready to eat meats. The project concluded that it was possible to correctly anticipate if a formulation in ready to eat meats would support the growth of listeria and whether the lag phase could be extended beyond the use by date of the product.

Because of the zero tolerance currently enforced on products which are found to have listeria *monocytogenes* there has been a lack of incentive with smallgoods manufacturers to ensure that their product does not support growth. The MLA project has provided the same manufacturers with an incentive to use a formulation which will ensure that their ready to eat product does not support growth or that the lag phase can be extended beyond the normal use by date.

AMIC is encouraged by the fact that Option 1 also reflects the approach adopted by the Codex Committee on Food Hygiene (Codex 2007).

AMIC notes that changes to the Code under Option 1 would also be consistent with the approach in establishing limits for *L. monocytogenes* in the FSANZ guidance documents (Recall Guidelines and RTE Guidelines).

For these reasons, AMIC supports a change in Standard 1.6.1 to reflect Option 1. Smallgoods manufacturers could be encouraged to invest in a formulation which will be a safer product and reduce the possibility of a product recall.

OPTIONS 2 AND 3

AMIC does not support Option 2 as it is of the opinion that this will be more difficult to apply in practice by many smaller operators.

AMIC does not support Option 3 because that would perpetuate the current zero tolerance regime currently enforced in Australia.

DEFINITION OF READY TO EAT MEATS

AMIC notes the codex definition of ready to eat food.

AMIC also notes that the FSANZ paper states “The definition of ready-to-eat applied to any microbiological criteria in Standard 1.6.1 will take into account existing definitions.”

However, the current Standard 4.2.3 has a definition of ready to eat meats which is somewhat different and a review of the definition which reflects Option 1, and the practical effect on the growth and no growth of *listeria monocytogenes* in ready to eat meat products, would deliver a more workable base to the meat industry.

CONCLUSIONS

AMIC has provided in this submission an overview of the issues which it considers most important for FSANZ to address rather than to attempt to address all the items in the terms of reference for this review.

AMIC appreciates the opportunity provided by FSANZ to have input to this important issue for the meat industry.