

SUBMISSION

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To: Food Standards Australia New Zealand

On the: Proposal P1017 Criteria for *Listeria monocytogenes* – Microbiological Limits for Foods

Date: 9 January 2014

Contact: [REDACTED]
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SUBMISSION TO FOOD STANDARDS AUSTRALIA NEW ZEALAND ON PROPOSAL P1017 "CRITERIA FOR LISTERIA MONOCYTOGENES – MICROBIOLOGICAL LIMITS FOR FOODS"

1. EXECUTIVE SUMMARY

- 1.1 Federated Farmers of New Zealand welcomes the opportunity to comment on the Proposal P1017 "Criteria for *Listeria monocytogenes* – Microbial Limits for Foods" paper.
- 1.2 While supportive of the proposal in general, the Federation is concerned at the proposed sampling requirement (documented in Attachment A) that requires that sealed retail packages of material be taken for analysis. Where the retail products concerned are high value – such as half or full legs of cooked ham – the sampling process carries a significant cost to the operator. Federated Farmers of New Zealand consequently recommends that FSANZ re-examine the sampling requirement to see if a less expensive, but still effective, sampling requirement can be developed for such high value products. This matter is discussed further below.
- 1.3 We would be pleased to discuss the matters raised with you in more detail should you believe this is necessary. Please contact David Burt, Industry Advisor, Primary Sector [E-Mail dburt@fedfarm.org.nz] in the first instance.

2. BACKGROUND

- 2.1 Our submission is in accordance with the call for submissions, by Food Standards Australia New Zealand, on Proposal P1017 "Criteria for *Listeria monocytogenes* – Microbial Limits for Foods" (8 November 2013).

3. SPECIFIC COMMENTS

- 3.1 [Attachment A – Draft variations to the Australia New Zealand Food Standards Code] Schedule 3 "Sampling of food for microbiological analysis (Page 23)
 - 3.1.1 This section states – in relation to the taking of samples of food, by an authorised officer, for microbiological analysis - that [3(2)(b)] "*where the sample consists of one or more than one sealed package of a kind ordinarily sold by retail, must submit for such analysis that sample in the package or those packages **in an unopened and intact condition***" (emphasis added).
 - 3.1.2 Where the (retail food) "package" is a leg (or half-leg) of cooked ham - and noting also that Section 2.3.2 requires that five samples be taken and the requirement [Attachment A, 3(2)(a)] that samples shall not be divided – the Federation wishes to draw to the attention of FSANZ the high commercial value of the proposed sampling protocol and the significant monetary loss that will be incurred by operators as a result of this process.
 - 3.1.3 The Rural Butchers industry group within Federated Farmers includes Dual Operator Butchers who will be impacted by the proposal. Many of these operators are small businesses and the financial impact of the proposed sampling protocol will be severe.
 - 3.1.4 Further, if the proposed requirement – ie to take whole hams for testing – is extended to other related processes (such as the validation of shelf-life) that involve sampling/testing for *Listeria monocytogenes* in such products, then the cost impacts will be even more significant.

- 3.1.5 The Federation urges FSANZ to determine if other, less expensive, sampling protocols might be available that would achieve the necessary public health outcomes - without destroying as much value – when testing high value products, such as cooked legs of ham.

4. ABOUT FEDERATED FARMERS OF NEW ZEALAND

- 4.1 Federated Farmers of New Zealand is a member-based organisation representing farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 4.2 The Federation aims to add value to its members' farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- Our members may operate their business in a fair and flexible commercial environment;
 - Our members' families and their staff have access to services essential to the needs of the rural community; and
 - Our members adopt responsible management and environmental practices.