



27 February 2015

Food Standards Australia New Zealand
Boeing House
55 Blackall Street
BARTON ACT 2600

Attention: Standards Management Officer

Review of microbiological criteria (second stage)

The Food & Beverage Importers Association (“FBIA”) welcomes the opportunity to respond to the Consultation Paper for the second stage of the Review of microbiological criteria. By way of background, the FBIA is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia.

Having updated microbiological limits for *Listeria monocytogenes* in ready-to-eat foods (Proposal P1017), FSANZ has now moved to reviewing the remaining microbiological criteria in the Food Standards Code to ensure their appropriateness for food safety management.

The consultation paper notes that since the microbiological limits in Standard 1.6.1 were first set, the approach to food safety arrangement has changed and now focuses on through-chain, preventative management. As well, there has been extensive increase in knowledge about foodborne illnesses.

Preventative approaches to food safety in Australia and New Zealand rely on food businesses implementing control measures throughout their production process and verifying that these measures are in place and working effectively. Food safety standards now provide obligations on food businesses and food handlers to produce food that is safe to eat.

The paper sets out FSANZ’s strategy for the remaining review of microbiological criteria, including principles for their development and establishment, the pathogen/commodity or commodity groups under consideration and the proposed priority and timeframe for consideration of issues. We note that FSANZ will be applying internationally recognised principles such as those of the Codex

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Alimentarius in the review of microbiological criteria and that criteria are to be established as either food safety criteria (applied to determine the safety of a lot) or process hygiene criteria (applied to verify hygiene measures/control of process).

The FBIA strongly supports this strategy.

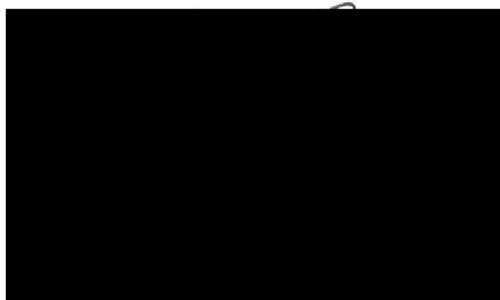
In addition, FSANZ proposes to complete the review of existing microbiological criteria (limits in Standard 1.6.1 and associated guidelines criteria) by the end of 2016. Broadly, the groups identified for review include:

- infant formula products
- seafood
- dairy foods
- meat and poultry products
- low moisture foods
- packaged water

We think those groups are appropriate and in particular, urge work on seafood and dairy foods.

Should you have any questions on the above, please do not hesitate to contact me.

Yours faithfully,



A J Beaver
Secretary