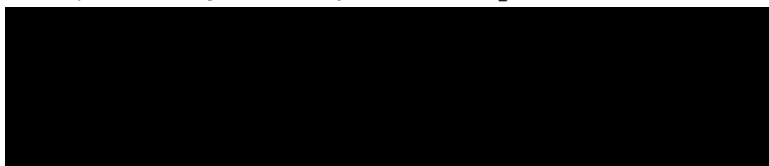


To whom it may concern

- Proposal P1017 – Criteria for *Listeria monocytogenes* – Microbiological Limits for Foods.
- Neil Harper Security and Compliance Manager



- Submission supported by Alpha , [REDACTED] , Technical Manager (UK)

Background Information

Alpha Flight Services, Pty Ltd, Australia are part of a global company .Flight catering kitchens in Australia are located in Sydney, Adelaide , Brisbane, Canberra , Coolangatta, Darwin , Melbourne, Perth, Sydney and Townsville.

We operate to strict Food Safety procedures based on the Global Industry guidelines (World Food Safety Guidelines version 3, June 2010) which have been produced with support from the International Flight Services Association (IFSA) and Association of European Airlines (AEA) and various Airline representatives operating Globally. The Alpha Food Safety procedures have been modified in line with local Legislation (National) which takes precedence.

Being a global company Codex /EU, FDA /USDA and Food Standards Australia and New Zealand Food safety regulations and guidelines have formed the basis of the Alpha Food Safety programs.

At each of its kitchens, Alpha has worked closely with the authorities responsible for enforcing the National and local legislation.

With regards Microbiological criteria the Guidelines for Assessing the Microbiological Safety of Ready –to –Eat Foods placed on the Market (Health protection Agency HPA) , the Commission Regulation EC No 2073 /2005 and the Public Health Guidelines for Ready-to-eat foods of various countries have been referenced.

Alpha Flight supports the proposed amendments to Standard 1.6.1. – Microbiological Limits for Foods in the Australia New Zealand Food Standards Code and the development of guidance or other tools to assist industry and enforcement agencies. The company supports the need for an internationally, nationally and locally (State & Territories) harmonised and consistent regulatory approach especially as its kitchens in Australia are located in several different states.

3.2.1 Risk management options.

In view of the above and after review of the Standard 1.6.1. and FSANZ Recall procedures the preference is for a combination of Option 1 (Codex) and Option 2.

- Whilst some Mandatory Microbiological limits have been set for some products in the EC Regulation No 2073 /2005 (Food Safety Criteria) it may take some time for criteria to be set for more Ready-to eat foods capable of supporting growth of *Listeria monocytogenes* .It will be useful to expand the list to include other Ready –to –eat foods that may be able to support growth of *L.monocytogenes* with guideline criteria for reference by business operators and food safety compliance staff to reference when assessing Public Health risk posed by results of microbiological verification programmes (Food sampling and Hygiene monitoring).
- Agree that unlike EC regulation No 2073/2005, the Standard 1.6.1 does not define clearly the application of the microbiological criteria e.g. point of manufacture, point of retail, Food Service, Catering or end of shelf-life etc. Additionally within flight catering kitchens as part of their Haccp verification samples are taken of Ready-to –eat foods as received , in –process and of finished meals before despatch from the kitchens. Additionally there are documented "Withdrawal " and "Recall " procedures based on those issued by the local Food Standards Agency. Therefore various Microbiological Guidelines are constantly referenced when making decisions on microbiological sampling results with the ultimate focus being protection of the end consumer health.

Definitions of Ready –to-eat

- Codex Definition is acceptable .However Definition of "listericidal steps "may need to be included on the amendments to the Standard or Guidelines.
- "Products that are intended to be consumed without any further biocidal steps "(Ref: Codex Alimentarius Commission).
- " Food intended by the producer or the manufacturer for direct human consumption without the need for cooking or other processing effective to eliminate or reduce to an acceptable level micro-organisms of concern " (Ref :Commission Regulation (EC) No 2073/2005 on Microbiological criteria for foodstuffs (Text with EEA relevance).
- " Food that is in a form that is edible without additional preparation to achieve FOOD safety " (Ref : FDA Food Code 2009:Chapter 1 - Purpose and Definitions
- " that is in a form that is edible without washing, cooking, or additional preparation by the food establishment or the consumer and that is reasonably expected to be consumed in that form " (Ref: IFSA and AEA World Food Safety Guidelines).

Growth or no growth

Factors which could support growth of *Listeria monocytogenes* in ready-to eat foods is not readily available to Catering staff. The complexities of interactions which could affect growth are not readily understood.

Therefore in the absence of information on factors that can control or affect growth e.g. PH, Water activity etc, rather than presuming "a ready-to –eat food could support growth of *L.monocytogenes* "it may be more practical to presume "refrigerated foods with a long shelf life which would be consumed without further processing (or in the same state) may be capable of supporting growth of *Listeria monocytogenes* during shelf-life "(Reference: FSANZ Recall Guidelines). Surveillance of products involved in *Listeria* outbreaks locally or worldwide and products involved in Recalls provides useful information when selecting Ready –to-Eat products for monitoring (e.g. potential Growth of *Listeria monocytogenes*).

Guidance material to assist industry and government in relation to requirements for *L.monocytogenes*

Several references of Guidance for control of *Listeria monocytogenes* in Ready –to –eat foods are being used by Manufacturers of Ready –to –eat foods as part of preventative controls (listed in References at the end of this Submission document). These also provide Best practice guidance to other Food Business operators e.g. Caterers. However the measures are operational in Ready-to –eat Food manufacturing environments where strict Listericidal controls can be implemented and where Absence of *Listeria monocytogenes* in 25g in a packaged product is achievable .These measures however cannot be implemented in a Catering environment , especially physical segregation into High Risk /Low Risk , *Listeria* Control programmes etc .Whilst Hygiene procedures including Haccp Pre-requisite procedures and monitoring procedures are operated the nature of flight catering operations is such that consistent absence of *Listeria* species in the environment or surfaces cannot be guaranteed .

Measures are in place to monitor the efficacy of cleaning standards and Absence of or low *Listeria* levels in food in process or in the finished meals (both Ready –to –eat to be consumed Cold or after reheating onboard the aircrafts.

Comment : Guidelines for testing of *L.monocytogenes* in the production environment as well as other stages in the production system will be useful as part of a preventative through –chain approach to ensuring food safety .Currently there are guidelines on food sampling results but not environmental sampling during investigations of "Borderline "Results (e.g. presence of *Listeria monocytogenes* detected 10-100 cfu/g) .Moreover there is no consistency between actions taken by the various states.

Methods of Analysis

Standard 1.6.1 Prescribes methods of analysis to determine levels of microorganisms in foods for regulatory purposes .As an Accredited testing lab is used for the analysis of samples taken from the various flight catering kitchens across Australia , the methods being used are "alternative validated methods ".Therefore whilst it is useful to have reference methods included in the amendment , reproducible methods used by Accredited laboratories should be sufficient to demonstrate consistence and for assurance .

Comment: Analysis of food samples to confirm compliance to the various microbiological Guidelines requires Enrichment Method, Enumeration and Speciation .There are costs involved in conducting this analysis. Whilst Manufacturers of Ready –to-eat foods capable of supporting growth of *Listeria monocytogenes* may conduct these at a higher frequency (e.g. Positive Release of equipment / Surfaces , ingredients) Caterers usually perform such analysis based on Risk Assessment (e.g. Refrigerated , Ready –to eat foods to be consumed without further heat treatment) . Reliance is on robust Food Safety programmes, Verification (Haccp Audits, scheduled Microbiological

sampling) and monitoring of Non –conforming product reports. Use of a larger number of simple tests to monitor hygiene standards (e.g. Indicator organisms) instead of specific tests for *Listeria* species in a Catering environment should be considered. This is operational globally in small Catering kitchens.

3.2.1.2. Option 2 – No limits in Standard 1.6.1

As mentioned above there is a need for both regulatory limits and advisory limits in the Standard 1.6.1 in line with the International approach.

3.2.1.3 –Option 3 –Status quo

This is not the preferred option.

3.2.1.4 Reference: FSANZ *Listeria* recall guidelines for packaged ready-to-eat foods.

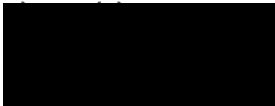
The Action levels for the two categories of Ready-to-eat food products listed in these Guidelines have possibly been used to instigate a large number of Recalls based on definition rather than the stage at which the sample was taken e.g. before leaving manufacturer premises or during product shelf-life .A zero tolerance approach appears to have been applied covering ready –to –eat foods requiring refrigerated storage and able to support growth of *L.monocytogenese* and those which have been implicated in human listeriosis .

As outlined above we support review of these in line with the international approach.

Finally we note and support the risk assessment work in assessing the Proposal P1017.

Kind regards

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