



Goodman Fielder Limited

Response to Proposal P1017
Criteria for *Listeria Monocytogenes* –
Microbiological Limits for Foods

November 2012

Introduction

This response has been prepared by Goodman Fielder Limited and we welcome the opportunity to provide comments with regard to criteria for *Listeria monocytogenes* limits in ready-to-eat foods.

Goodman Fielder is one of Australasia's largest food manufacturing companies, owning many well known brands in Australia and New Zealand. These comprise bread and bread related products, edible & cooking oils, margarines, ready to eat cakes and slices, desserts and topping mixes, cake mixes, cooking ingredients, salad dressings & mayonnaise, frozen pastry and desserts, pasta sauce, table sauce, Asian meal kits and sauces, biscuits and savoury snack products.

General Comments

End point testing of finished product is not effective for management of *Listeria monocytogenes* (Lm) due to the nature of sampling and time taken for test results to be returned. Not all product can be managed through a hold and release system due to very short shelflife (eg. sandwiches). Preventive through-chain approaches, such as a *Listeria* Management Programme which follows the guidance provided by the New Zealand Food Safety Authority (NZFSA), allow a business to take ownership and have greater control over the production of safe food.

Regulatory Options

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*

Comment

Option 1 would align Australasia with Codex, the EU and North America. Food safety outcomes that are risk-based and science-based are appropriate and in proportion to the risk to health. Illness from Lm infection has been demonstrated to be a dose-response infection relationship. Some foods support growth of Lm more readily than others. Foods are stored for varying lengths of time. Option 1 addresses these aspects. Option 1 also provides a regulatory limit for enforcement or in the event of prosecution. Regulatory limits also consistently and clearly state a critical point where the operator must take action. Option 1 differentiates foods that support growth and foods that do not as well as recognising the dose-response nature of Lm infection.

If Option 1 were selected, definitions for ready-to-eat foods (eg. does not apply to foods with cooking instructions, etc) and short shelflife should be provided. Guidance on use of Best Before Date or Use-by Date for products that do support the growth of Lm must be provided to align with revised Lm limits.

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*

Comment

Aspects of Option 2 should be introduced as tools to control Lm and demonstrate due diligence. The on-going implementation and verification of appropriate hygiene and manufacturing controls in Chapters 3 and 4 of the Joint Australia New Zealand Food Standards Code apply to Australia only, are not specific and do not address the unique features of Listeria management. The Guidance document provided by NZFSA provides information across a wide variety of situations and is flexible with respect to size of business, product type, level of staff expertise etc.

Recommendations

- 1) that Option 1 is adopted as the most effective risk management approach; and
- 2) that the definition of ready-to-eat food as outlined on p8 of the Proposal is included in Standard 1.6.1 as well as guidance on the use of Best Before and Use By dates; and
- 3) that some aspects of Option 2 are included in Standard 1.6.1, specifically the development of a preventative through-chain approach to food safety.