

25 February 2015

Food Standards Australia and New Zealand,
PO Box 7186
CANBERRA BC, ACT, 2610

Via email: submissions@foodstandards.gov.au

Dear Food Standards Australia New Zealand,

**Submission – Consultation Paper on
Completing The Review of Microbiological Criteria**

The Australian Beverages Council (the Beverages Council) is the peak body representing the \$7 billion non-alcoholic beverage industry. The Beverages Council provides a single, united industry voice to a range of stakeholders including government, non-government organisations, media and the general public.

Membership of the Beverages Council comprises over 95% of the non-alcoholic industry's production volume and is comprised of multi-national companies, small and medium business. The Beverages Council has two dedicated category divisions – Fruit Juice Australia and the Australasian Bottled Water Institute, which represents the unique interests of members manufacturing juice and bottled water products respectively.

It is understood that the existing microbiological limits in Standard 1.6.1 in the *Australia New Zealand Food Standards Code* (the Code) and associated guidelines were developed before 2000. Since then, a preventative through-chain approach to food safety has evolved and work has progressed internationally to further inform our understanding of pathogen management in the food chain, including the management of 'emerging' pathogens.

The Beverages Council notes and agrees that it is now widely understood that microbiological testing of end products alone cannot assure food safety. Over the past twenty years microbiological food safety management has moved from a reactive approach based on inspection and compliance with end product testing to a preventative approach, in which



control measures are implemented throughout the food chain and depends on having “fit for purpose” criteria .Such criteria for food safety requirements should be included in the Code under the food safety standards in Chapter 3 and the primary production and processing standards in Chapter 4

The Beverages Council also agrees and wishes it noted that the mandatory microbiological criteria currently established in Standard 1.6.1 of the Code provides microbiological limits, sampling plans and reference methods of analysis for nominated foods, or classes of foods. These limits were largely derived from microbiological standards that existed in the vertical food standards in the former Australian *Food Standards Code*(before 2000) and were retained based on qualitative risk assessment. This Standard in conjunction with World Health Organisation Guidelines for Drinking Water have been the foundation basis on which the Australasian Bottled Water Institute's (ABWI) Model Code was originally established in 1995 (periodic reviews since). Adherence to the Model Code is a condition of membership of the Beverages Council.

Microbiological (as well as chemical) criteria and limits are constantly monitored by the adjudicators responsible for the revision of this Model Code with input from the international body - The International Council of Bottled Water Associations (ICBWA). Presently this group finds no additional indicator organisms other than Enterobacteriaceae , *E. Coli* (as listed in Std1.6.1 for Packaged Water necessary for monitoring such risk). Total plate count / yeast and mould / as well as heterotrophic testing is part of the overall quality assurance program for such manufacturing members, who are annually audited to this Model Code compliance.

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We thank FSANZ for the opportunity to provide this submission regarding and support a **STATUS QUO** for the REVIEW OF MICROBIOLOGICAL CRITERIA :RELATING TO PACKAGED WATER STD 1.61.. [REDACTED]

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[REDACTED]
[REDACTED]
Yours sincerely,

[REDACTED]
Technical and Regulatory Affairs Manager



