

3 November 2015

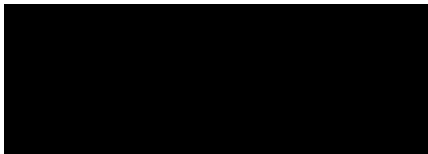
Project Manager  
Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143  
NEW ZEALAND

Email: [standards.management@foodstandards.gov.au](mailto:standards.management@foodstandards.gov.au)

Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1111: Bacteriophage S16 & FO1a as a Processing Aid.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**

**CALL FOR SUBMISSIONS – APPLICATION A1111:  
BACTERIOPHAGE S16 & FO1A AS A PROCESSING AID**

**6 November 2015**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1111: Bacteriophage S16 & FO1a as a Processing Aid.***

### **New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

### **The Application**

Micreos B.V. has applied for permission for a *Salmonella* phage preparation (S16 and FO1a), *Salmonex*™, (subsequently called *Salmonella* phage in this submission), for use as a processing aid to reduce *Salmonella* spp. contamination in specific foods, namely during post-slaughter processing of fresh meat and poultry products.

Bacteriophages are viruses that infect and break down bacterial cells. They are specific to the strains of bacteria they infect and are not pathogenic to plants, animals or humans. Bacteriophages cannot actively locate bacterial cells; they are non-motile and rely on passive diffusion to locate and attach to receptor sites on target bacterial cells. They are not meant as a replacement for good hygienic practices nor as an alternative to approved and effective cleaning and sanitising agents generally used in the food industry.

### **Comments**

This *Salmonella* phage, according to the evidence in the application, is highly specific to *Salmonella* species and is for use during post-slaughter processing of raw meat. Several antimicrobial controls are applied at various steps during poultry processing in what is known as a multi-hurdle approach, usually resulting in multiple antimicrobial interventions being used. An additional antimicrobial control to add to the ‘toolbox’ is a positive food safety measure. NZFGC notes that, as with all antimicrobial interventions, the use of the applicant’s *Salmonella* phage should be viewed as an additional tool for control of *Salmonella* in food, supplementing Good Manufacturing Practices (GMP), Hazard Analysis Critical Control Points (HACCP) and other measures aimed at preventing *Salmonella* contamination, and should not be seen as a replacement of hygiene.

EFSA and the USDA have each commented on and approved a range of bacteriophages for food products not only for *Salmonella* but also *Listeria*. In 2012, FSANZ approved Application A1045 also submitted by Micreos B.V., to permit the use of *Listeria* phage P100 (tradename

Listex P100™) as a processing aid on approved foods for use of phage under conditions of GMP.

The FSANZ risk assessment of the current Application A1111, found that overall the *Salmonella* phage was efficacious and did not have an ongoing technological function on raw fresh meat and poultry products. FSANZ concluded that the *Salmonella* phage was unlikely to pose any health risk when used as intended to treat fresh raw meat and poultry. Further, the proposed use of the *Salmonella* phage as a processing aid to reduce the levels of *Salmonella* during post-slaughter processing of raw fresh meat and poultry, was technologically justified in the form and prescribed amounts, and demonstrated to be effective. The *Salmonella* phage was completely characterised and there was no ongoing technological function performed when used as intended.

NZFGC is well aware that *Salmonella* is one of the most commonly reported causes of foodborne illness, with fresh raw meat and poultry often implicated as a source of infection. Meat is susceptible to *Salmonella* contamination during processing, with poultry meat more susceptible than other meat. Products such as the applicant's *Salmonella* phage, is a positive addition to the options available to reduce *Salmonella* in raw meat and poultry and is supported on this basis.