

Standards Liaison Officer
Food Standards Australia New Zealand
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Proposal P1039 – Microbiological Criteria for Infant Formula

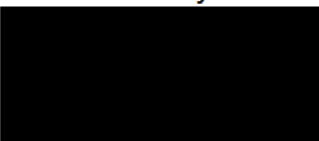
On 9 October 2016, Food Standards Australia New Zealand called for submissions in relation to Proposal P1039, Microbiological Criteria for Infant Formula.


The Australian Food and Grocery Council (AFGC) has had the opportunity to see the submission of the Infant Nutrition Council (INC) on this Proposal, and supports the comments made in that submission. In particular, the AFGC -

- **supports** the harmonisation of Australian regulation with standards in comparable jurisdictions and with Codex Alimentarius;
- **supports** the creation of distinct microbiological limits for powdered infant formula (0-6 months) and follow on formula (6-12 months), which reflects the epidemiological evidence and risk profiling in relation to pathogens in infant feeding products;
- **notes** that such a distinction also aligns with Codex and EU regulation;
- **supports** the draft variations in relation to pathogen criteria and sampling;
- **agrees** with the FSANZ assessment that microbiological limits for *B. cereus* and *S. aureus* are not necessary.
- **supports** the removal of process hygiene criteria from the Standard to the *Compendium of Microbiological Criteria for Food*, and in particular that testing of infant formula products, both during and after manufacture, for mesophilic aerobic bacteria and Enterobacteriaceae provides useful guidance to manufacturers to assess the effectiveness their hygiene programmes, without the need to regulate such testing.

The AFGC considers this assessment to reflect current scientific evidence and good regulatory practice, and accordingly commends FSANZ for its analysis.

Yours sincerely




Director, Legal and Regulatory