

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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4 November 2015

SUBMISSION

Attention: **Manager P1039**
Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia, 2610.

Re: Microbiological Criteria for Infant Formula

FTA Australia has reviewed this [Proposal](#) and endorses the following comments of the Technical Sub Committee:

The Committee reviewed this document and rejected the proposed changes, due to the following:

1. It was agreed with the introduction of testing for *Cronobacter* species (also known as *Enterobacter sakazakii*) as per Codex Standards.
2. It was suggested that the new entry in the Australia New Zealand Food Standards Code use both names so as to initially enable Australian manufacturers to compare with overseas Food Standards for Infant Formula, etc that use mainly, at this time, the description *Enterobacter sakazakii*. The use of the official name only could be mandated in a Standards Variation/Omnibus at some future time, say 12 months, after introduction.
3. The current Standard 1.6.1 for Powdered Infant Formula Products, particularly for *Bacillus cereus*, Coagulase-positive staphylococci (*Staphylococcus aureus*) and Coliforms should be retained, as these micro-organisms are required to be tested in overseas jurisdictions where Australia made Infant Formulas are sold. SPC may be safely removed for any future Standard.
4. Although the suggested deletion of testing for some micro-organisms, that theoretically in ideal situations might not cause serious health problems, as Infant Formula which is fed to a highly vulnerable population with an initially compromised immune system, is a highly complex product comprising a large number of ingredients from a variety of sources and undergoing further processing (mixing, both dry and wet processes), packaging procedures, inclusion of a scoop, etc, all of which are potential sources of microbiological contamination.

5. In process testing would not be feasible, unless a problem is detected, as most manufacturers would prefer that Infant Formula not be held in a temporary unfinished form until microbiological testing is completed.
6. It is suggested that Australia retain a very strict testing procedure to obviate potential problems. It is further suggested that removal of the current testing regime, except for *Salmonella* and with the agreed and long overdue introduction of testing for *Cronobacter* species, should only occur when the countries that import Australian product also accept the Codex Standard.

If there are any queries regarding this submission, please contact the Technical Secretary, [REDACTED],
[REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Proposal](#).

Yours sincerely,

Del Teesdale
PRESIDENT – FTA AUSTRALIA