Submission: FSANZ Consultation Paper on Completing the Review of Microbiological Criteria

Submitter: Agnes Tan, Food Safety Consultant

Contact details: [redacted]

I submit these comments for your consideration.

Role of Microbiological Testing

Microbiological testing does not provide real time information and is not useful for real time process control. It is, however, useful for verification of process control and for demonstration that a product meets its specifications.

From a regulatory perspective, microbiological testing, in conjunction with regulations requiring notification of pathogens in foods, provides a means of capturing results of private testing for food safety management.

Pathogen testing and the subtyping of the isolated pathogen is indispensable for outbreak investigations and for root cause analyses.

Use of existing microbiological limits and any difficulties in their application

From my experience, the current sampling and limits in Standard 1.6.1 are not used for regulatory compliance because of cost. Local government would routinely take 1 sample for analysis. However, the microbiological limits in Standard 1.6.1 are used as indicators of product safety.

Proposed development and application of microbiological criteria to support food safety management

I support the approach proposed for the development of microbiological criteria. I believe that

- Standard 1.6.1 should only cover food safety criteria. Any food that does not meet the requirements of this Standard cannot be sold.
    - In the infant formula example provided, the actions to be taken when limits are not met are not binding. That is, failure to meet limits "should result in the affected lot not being released for human consumption..". This creates uncertainty.
- Food hygiene criteria should be in the form of guidelines as these may change with new processing developments. [Note: it is not clear from the paper if FSANZ proposes to

develop process criteria for finished product, as set out in the powdered infant formula example or at different stages in production. My comment applies to the latter scenario.]

Food groups identified for review

1. Low moisture foods encompass a wide range of products from spices to chocolate to peanut butter. They pose different risks and it may be too difficult to put them all in the 1 grouping.
2. Should produce (intended to be eaten raw) form another group? Apart from sprouts - leafy greens and other vegetables such as snow peas (often imported) are eaten raw. There have been several outbreaks associated with these foods.

Finally, I suggest that consideration be given to

1. The possibility of different intended uses of the product when developing the microbiological criteria
2. Management of foods that fall into more than 1 group. For example, sliced cooked meats – should they fall under meat & meat products or under ready to eat foods?
3. Providing an explanation of the test sample size. Although this is evident to the scientific community, Standard 1.6.1 is also used by non-scientists.
4. Whether there is capacity to test for new agents identified as risks in this review, but are normally low in demand. For example, there is currently no NATA accredited laboratory for the detection of Hepatitis A and Norovius in foods. Listing an agent in Standard 1.6.1 will not necessarily promote testing for it, especially if it is an expensive test.