



Submission
FSANZ Consultation Paper on Completing the Review of Microbiological
Criteria
27th February 2015

Thank you for the opportunity to comment on FSANZ Consultation Paper on Completing the Review of Microbiological Criteria.

1. This submission is made by Seafood New Zealand Limited on behalf of the New Zealand commercial seafood industry.
2. Seafood New Zealand is a professional organisation delivering industry good services for the wider benefit of the seafood industry. The Seafood Standards Council, an official committee of the Seafood New Zealand board plays a leading role in developing and presenting the seafood industry's response on legislative and regulatory proposals affecting the industry, in the animal products and food safety space.
3. This submission is based on consideration of the following:
 - a) FSANZ Consultation Paper on Completing the Review of Microbiological Criteria.
4. Seafood New Zealand supports the process to continue to review Standard 1.6.1, in order to provide clarity and to ensure the standard is aligned to international approaches, such relevant Codex Alimentarius standards.
5. As the paper discusses, food safety management has evolved since Standard 1.6.1 was developed, now focussing on a systems approach to prevention and risk management rather than relying on final product testing to assure food safety. Therefore we contend that food safety criteria should only be included in the standard where there is a genuine pathogen-commodity risk and specified criteria are needed to protect public health.
6. The paper proposes that food safety criteria and process hygiene criteria will be developed as applicable. We are strongly of the opinion that the joint Australia-New Zealand standard (i.e. Standard 1.6.1) should only contain necessary food safety criteria, and that any process hygiene criteria should be removed and thus left to each individual country (i.e. Australia and New Zealand) to determine the appropriate management tool.
7. We also suggest that review includes both Standard 1.6.1 and the associated guidelines as part of its scope, and agree that it should be conducted in a manner aligned to Codex principles for the establishment and application of microbiological criteria for food.

8. Again thank you for this opportunity to provide these comments and we look forward to further consultation as the review progresses.

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