

31 October 2011

Food Standards Australia New Zealand  
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The Terrace  
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By email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Dear Sirs

Submission for the approval of Listex P100 as a processing aid (Application A1045)

On behalf of Hawkins Watts Ltd we seek to make a submission in favour of the approval of the Listex P100 phage as a processing aid, as per the application "Bacteriophage Preparation as a processing aid".

Background

*Listeria monocytogenes* (*Listeria*) is a bacterium that can cause the foodborne illness called listeriosis. Although the reported incidence of foodborne listeriosis in New Zealand is relatively low when compared to the likes of campylobacteriosis and salmonellosis, the serious consequences of infection and high mortality rate, particularly in unborn babies.

David Gadiel (2010) estimated that there are approx 20 cases per year of Listeriosis in New Zealand and *Listeria* caused 7 out of 11 product withdrawals in 2009.

The costs of listeriosis, in both human and monetary terms, are undeniable.

Listeria management

The New Zealand Food Safety Authority (NZFSA) has a detailed risk management strategy, introduced in 2008, to target the prevalence of *Listeria* in food. One of the aims of this strategy is to achieve 'no increase in the reported incidence of foodborne listeriosis after five years'.

Cases of listeriosis have been linked to chilled, ready-to-eat foods with an extended shelf life. The increased availability, variety and consumption of chilled ready-to-eat meals, suggests that the opportunity for increased cases of listeriosis may increase and negate this aim. However we submit that the approval of the Listex P100 may assist NZ food manufacturers to meet the NZFSA aim, reduce the incidence of listeriosis and confirm New Zealand as a manufacturer of safe, high quality food.

### Potential uses

The application made by EBI Food Safety is based on its use in non-liquid ready to eat foods.

We submit that this phage could have major benefits for consumers of products such as;

- Cooked small goods, particularly sliced meats
- Cheeses
- Cooked seafood, such as mussels
- Prepared herbs and salads

We submit that these four food sectors account for 90% of the potential volume of Listex use in New Zealand.

### Food Safety

While the food industry has increased focus on the reduction of Listeriosis, the ubiquitous nature of the pathogen and random occurrence of many Listeriosis cases suggests that it is hard to manage and control.

As Listex has been shown to have between a 2D and 4D reduction in Listeria, it cannot be considered as a remedial tool for poor food safety or hygiene.

We submit that the Listex P100 phage will only become effective as part of an integrated food safety program, and not as a *solus* measure. It will therefore not be seen as an alternative to a functioning food safety program.

Phages are naturally occurring viruses. The Listex P100 is specific to Listeria sp. Based on the evidence presented in the application we submit that there are no reasons for safety concerns.

In conclusion we support the application by EBI Food Safety for the Bacteriophage Listex P100 to be permitted as a processing aid for non-liquid ready-to-eat foods.

Yours faithfully

Hawkins Watts Ltd



Paul Harrison  
Technical Director

Disclosure of Interest: Hawkins Watts represents EBI Food Safety as importing agent in the New Zealand market place.

### Reference

Gadiel, David, 2010. The economic cost of foodborne disease in New Zealand. Applied Economics Pty, Prepared for the New Zealand Food Safety Authority.