

Current law is effective when enforced. It's assured by enforcing adherence to HACCP-based principles/GHP/Guides/guidance & best practice (inc. shelf life) + action plans, & requires continuous compliance verification by FBOs, customers, 3rd party auditors & CAs. Epidemiology shows clear food safety benefit of this & is, we contend, sufficient to fill any perceived legal gap, so no new legal Lm limit is necessary. The proposals are a move by EU away from risk- to hazard-based law & from science, taking no account of differing virulences of Lm strains, published QMRAs or multifactorial listeriosis mitigation analyses.

Proposal text clarifications needed

- Footnote (2): 'absence' must change to 'not detected' (ND). Non-detection does not guarantee absence. This is a technical wording error
- 'the values observed' referred to are those from by CA testing, not done by the FBO. Any detection by the FBO needs to be supported by evidence of criterion 1.2a compliance
- Methods for FBOs can be validated alternatives to ISO-11290-2 or ISO-11290-1

We propose instead of 1.2b ND throughout life

1. Current law enforced at all stages of supply & distribution as this is known to be effective in reducing listeriosis (One Health data for Ireland & UK)
2. Failing this, a quantitative limit of 10 or 20 cfu/g as defined by EN/ISO 11290-2 throughout life would reflect public health & sustainability policy needs without disincentivising FBOs from carrying out monitoring testing so reducing control.

IFST Support the Industry Listeria Group's Technical Summary document (submitted by Industry Listeria Group to this consultation).