

**RTE Food Guidelines working group of the Health Protection Agency Regional Food, Water & Environmental Co-ordinators Forum**  
**Chair: Prof Eric Bolton**

**Consultation document: Health Protection Agency Guidelines for Assessing the Microbiological Safety of Ready-to-Eat Foods**  
**November 2008**

10 February 2009

Page number	Item Number	Comments
5	1.0	The new emphasis on interpreting results using a risk basis, focusing on public health, is a welcome development.
8	1.2	I agree that the mere existence of criteria and end-product testing alone cannot protect consumer health, and that Good Hygiene Practice and HACCP systems are more important.
12	2.1	<p>The statement that “Detection of foodborne pathogenic bacteria in ready-to-eat food represents an unacceptable risk to health regardless of the number of bacteria present” is not correct in every case.</p> <p>The statement appears to refer to the pathogens listed in Table 2.0. However the statement is at odds with the contents of Table 2.1, which indicate that the presence of low levels of certain pathogens (e.g. <i>Vibrio parahaemolyticus</i> at a level of &lt;20cfu/g) is acceptable. A suggestion would be to rewrite the statement to read: “The presence of foodborne pathogenic bacteria listed in Table 2.0 in ready-to-eat food...”</p> <p>Also, a ready-to-eat food such as sashimi or smoked salmon has not undergone a cooking treatment. Any <i>Listeria</i> on the raw material will therefore remain on the finished product. While Good Hygiene Practice and HACCP should minimise the incidence of <i>Listeria</i> on the finished product, the occasional detection of <i>Listeria</i> on the final product does not necessarily imply that the food is unacceptable. This view has been expressed by the European Food Safety Authority in a recently updated Opinion on the presence of <i>Listeria</i> in ready-to-eat foods<sup>1</sup>, and is reflected in the microbiological criteria for <i>Listeria monocytogenes</i> listed in European Regulation 2073/2005.</p>

<sup>1</sup> European Food Safety Authority. Request for updating the former SCVPH opinion on *Listeria monocytogenes* risk related to ready-to-eat foods and scientific advice on different levels of *Listeria monocytogenes* in ready-to-eat foods and the related risk for human illness. Scientific Opinion of the Panel on Biological Hazards. 2008.

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		A more considerate approach is indicated in the first bullet point of Item 5.1 of the draft guidelines, which states that when pathogens are detected, action needs to be taken in proportion to the risk to human health.
14	-	The guidance on the named pathogens in this table, including <i>V. cholerae</i> , is useful to the seafood industry.
16	-	<p>The presence of between 10 and <math>\leq 10^2</math> cfu/g of <i>Listeria monocytogenes</i> does not necessarily imply that the food is unsatisfactory, though I agree with the requirement for intervention as listed in the Action column.</p> <p>The criteria listed for <i>Vibrio parahaemolyticus</i> will prove useful to the seafood industry. They are particularly welcome because no microbiological criterion for <i>V. parahaemolyticus</i> is listed in European Regulation 2073/2005.</p>
32	8	I agree with the guidance on ready-to-eat fish and cold smoked fish, and with Note f on acceptable levels of yeasts etc.
41	-	I would suggest changing the <i>Vibrio cholerae</i> 's "Food types most often associated with human infections" from "Seafood" to "Imported seafood", since <i>V. cholerae</i> is not associated with locally caught fish and shellfish.