

**Review of The Australian New Zealand Food Standards Code: position paper prepared by Peter McFarlane, AOA OliveCare® Code of Best Practice Administrator
M: 0418 839 836; E: peter@mc.com.au**

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[Foodborne Illness Reduction Strategy 2018-21+](#)

Review of The Australian New Zealand Food Standards Code:

Food Standards Australia New Zealand (FSANZ) is currently reviewing food safety standards in the Food Standards Code.

The review will focus on:

- *The requirements for food safety management in the food service sector and closely related retail sectors, and*
- *Potential development of a primary production and processing standard for high-risk horticulture products to introduce requirements to manage food safety on-farm, including requirements for traceability.*

Firstly it is important to recognise that well-made olive products are regarded as high food safety risks:

- Olive oil products that have low moisture levels do not support growth of microbes – however some flavoured oils infused with fresh fruit or vegetables, emulsions can form in the anaerobic environment of the oil to support the growth of *Clostridium* with associated food safety risk.
- Table olives naturally fermented in brine are regarded as high acid products with a pH <4.3 and NaCL > 6.0 % and are considered to be shelf stable and safe at room temperature.

The focus of the FSANZ review is on ready to eat (RTE) foods that are not shelf stable including foods containing, meat, seafood, eggs, dairy and seed sprouts. In addition the review will look at high-risk horticulture products includes leafy green vegetables, melons, berries, sprouts and ready-to-eat minimally processed fruits and vegetables.

The following explanation sets out the likely impact of the review on the Australian olive industry.

Chapter 1: Introduction:

Food Safety Standard 1.6.1: Microbiological limits in foods – currently does not apply to olive products (rather it is aimed at high risk ready to eat foods)

Note: The Voluntary standard for table olives in Australia (RIRDC 2012) incorporates microbiological limits so in this respect we are well ahead of the game. Testing against this standard currently applies to table olives entered into the AIOA competition, and to OliveCare® certified table olive products.

Routine microbiological testing of naturally fermented table olives now includes:

- Microbiological Criteria - *Escherichia coli*: Not detectable (<3 cfu/g)
- Microbiological Criteria - *Clostridium perfringens*: Not detectable (<10 cfu/g)

- Microbiological Criteria - *Lactobacillus*: Not detectable (<10 cfu/g) – (only for pasteurised product)

Chapter 3: Food safety standards

Any business (including those that process or pack olive products) in Australia is deemed a ‘food business’.

All food businesses in Australia are currently required to comply with the Australia New Zealand Food Standards Code, including Food Safety Standard 3.1.1: Interpretation and Application, Food Safety Standard 3.2.2: Food Safety Practices and General Requirements, and Food Safety Standard 3.2.3: Food Premises and Equipment.

Food Safety Standard 3.2.1: Food Safety Programs, sets out the requirements for the control of food safety hazards during the production, manufacture and handling of food, **is not mandatory for all food businesses**. It applies only to 4 industry sectors that have been identified as being high risk, (food service to vulnerable populations, raw oysters and other bivalves, manufactured and fermented meat, and catering operations to the general public.)

However, in some state jurisdictions such as NSW and Victoria all food businesses (including olive processors) are required to have a food safety program (except for retail businesses selling low-risk pre-packaged food). This provision also requires food safety supervisor arrangements, mandatory training of food handlers and evidence of management of key activities and control processes.

Other jurisdictions may also require businesses to have HACCP-based food safety systems in place. Therefore, all food businesses need to check with their local authority for the requirements that apply in the state or territory where the business is located.

Should there be a serious food-safety incident with table olives in Australia, further regulation could be imposed on the industry.

This could include mandating Standard 3.2.1: Food Safety Programs, and Food Safety Standard 1.6.1: Microbiological limits in foods

To assist in implementing Good Agricultural Practice (GAP), and Good Manufacturing Practice (GMP), AOA has developed a Hazard Analysis Critical Control Point (HACCP) style Food Quality Plan template for Table Olives for use by OliveCare® Signatories.

Food Safety Standard 3.3.1: Food safety programs for food service to vulnerable persons – does not apply to olive producers – it only applies to food service in hospitals, aged care and child care and similar situations where vulnerable people are involved.

Further details on specific standards under the Australia New Zealand Food Standards Code are available on the Australian Government ComLaw website¹.

Chapter 4: Primary production standards

Currently these requirements only apply to high risk products – meat, seafood, dairy, eggs and seed sprouts.

FSANZ will consider a proposal to develop a Primary Production and Processing Standard for high-risk horticulture.

Proposed high-risk horticulture includes leafy green vegetables, melons, berries, sprouts and ready-to-eat minimally processed fruits and vegetables.

In Summary:

The three areas of the Standard currently under review are:

Chapter 3 —Food Safety Standards (Australia only)

- Already implemented for table olive producers in some jurisdictions / states.

- Proposed national implementation of :

- Food safety supervisor arrangements
- requirements for evidence to be provided by food businesses to demonstrate that key activities or control processes are being managed
- mandatory training for all food handlers

This would mean more olive producers would be required to comply with food safety training requirements – not such a bad thing!

Chapter 4 —Primary Production and Processing Standards (Australia only)

It is unlikely that olive products will be caught up in proposed new PPP standards

Standard 1.6.1 —Microbiological Limits for Food

Is already addressed in the *Voluntary standard for table olives in Australia (RIRDC 2012)*, and *OliveCare®*.