

SECOND CONSULTATION ON PROPOSED AMENDMENTS TO THE FOOD REGULATIONS REGARDING MICROBIOLOGICAL STANDARDS FOR READY-TO-EAT (RTE) FOOD

Aim

The Agri-Food and Veterinary Authority (AVA) is seeking feedback from stakeholders on proposed revised amendments to the Food Regulations concerning the microbiological standards for ready-to-eat (RTE) food, following the first public consultation.

Background

2 AVA initiated the first public consultation exercise on proposed amendments to the Food Regulations regarding microbiological standards for RTE food from the period 22 August 2017 to 23 October 2017. Feedback was sought from stakeholders on the following:

- I. Whether the proposed definition of RTE food accurately describes such food.
- II. Whether the 5 categories of RTE food accurately describe all the categories of RTE food available on the market.
- III. Whether the RTE food products imported / manufactured by companies are able to comply with the proposed limits for total plate count, indicator organisms and pathogens.

The consultation document is available for viewing at the following website:
<https://www.reach.gov.sg/participate/public-consultation/agrifood-veterinary-authority-of-singapore/regulatory-programmes/proposed-amendments-to-the-food-regulations-regarding-microbiological-standards-for-rte-food>

3 At the close of the first public consultation, AVA received comments on I, II and III. The summary of comments received, together with AVA's response, can be downloaded from the REACH portal:

<https://www.reach.gov.sg/participate/public-consultation/agrifood-veterinary-authority-of-singapore/regulatory-programmes/proposed-amendments-to-the-food-regulations-regarding-microbiological-standards-for-rte-food>

4 Arising from the comments received, AVA has further reviewed the proposed microbiological standards for RTE food, and proposes the following revisions, taking into consideration the comments received.

Proposed revised amendments

5 AVA proposes to revise the definition of RTE food as follows (refer to right hand column of table below), to provide greater clarity on the type of food products that are considered to be “ready-to-eat” and for which the microbiological standards under the Food Regulations would be applicable.

Proposed definition in 1st consultation	Proposed revised definition
Food intended by producer or the manufacturer for direct human consumption without the need for cooking or other forms of processing effective to eliminate or reduce to an acceptable level the micro-organisms of concern	Food that is made available for sale for direct human consumption without the need for cooking or any other form of processing to eliminate, or reduce to the standards specified in the Eleventh Schedule, any pathogenic or other micro-organisms of concern in food; and includes concentrated food (e.g. beverages, cup noodles and fruit juice cordials, squashes and syrups) which have to be reconstituted or diluted with fluids before consumption, chilled or frozen cooked products (e.g. chicken wing, pizza and instant meal) which may be re-heated before consumption.

6 AVA proposes to remove limits for total plate count (TPC) from the Food Regulations, taking reference from the practices in Australia, Canada, United Kingdom, Ireland, and Hong Kong, which have published guidelines for the industry, rather than legislate the TPC limits. This is also consistent with the Codex Principles and Guidelines for the Establishment and Application of Microbiological Criteria related to Foods (CAC/GL 21-1997), which does not specifically indicate that total plate count is suitable as a mandatory microbiological criterion.

7 In the case of indicator organisms, AVA proposes to replace the coliform limits with Enterobacteriaceae limits, taking reference from the microbiological standards in Australia, New Zealand, the European Union and Hong Kong. *Enterobacteriaceae* is a large group of biochemically and genetically related bacteria that are useful indicators of the general hygiene status of a food product. Their presence in high numbers (>10⁴ per gram) in heat-treated food indicates inadequate cooking or post-processing contamination.

There are no proposed changes to the microbiological standard for Escherichia coli count in RTE food from the first public consultation. The revised table for indicator organisms is as follows:

Type of Food	Enterobacteriaceae count Colony forming unit/ gram (cfu/g) [NEW]	Escherichia coli count Colony forming unit/ gram (cfu/g) (no change from first consultation)
Milk powder (including full-cream, half cream, skimmed milk and infant formula), buttermilk powder, pasteurized milk and ice cream	<10 ⁴	<10 ²
All other ready-to-eat food	<10 ⁴	<10 ²

8 AVA proposes to only list those pathogens with specified limits (refer to table below). There are no quantitative changes to the limits from the first consultation. As in the first consultation, pathogens other than the ones listed in the table below, whether or not commonly associated with the RTE food, should not be detected in 25 grams of the RTE food.

Pathogens	Colony forming unit /gram (cfu/g)
Coagulase-positive <i>Staphylococcus aureus</i>	<10 ²
<i>Bacillus cereus</i>	<2.0 X 10 ²
<i>Clostridium perfringens</i>	<10 ²
<i>Vibrio parahaemolyticus</i>	<10 ² in ready-to-eat raw seafood only

Request for comments

AVA invites views and comments on the proposed revised amendments in paragraphs 5 to 8 above.

Procedure and timeframe for submitting views and comments

All submissions should be clearly and concisely written, and should provide a reasoned explanation for any proposed revisions.

Submissions should reach AVA no later than 12:00 p.m., 21 November 2018, through mail, or email, to the following addresses:

Mail:

Regulatory Programmes Department
Agri-Food & Veterinary Authority of Singapore
52 Jurong Gateway Road
#13-01 Singapore 608550 (Attention: Ms Leong Ai Ling)

Email:

leong_ai_ling@ava.gov.sg