

## **RESPONSE TO COMMENTS RECEIVED FROM THE SECOND PUBLIC CONSULTATION ON PROPOSED AMENDMENTS TO THE FOOD REGULATIONS REGARDING MICROBIOLOGICAL STANDARDS FOR READY-TO-EAT (RTE) FOOD**

The former Agri-Food and Veterinary Authority (AVA), now the Singapore Food Agency (SFA), initiated a second public consultation exercise for the period 22 October 2018 to 21 November 2018 on proposed revised amendments to the Food Regulations regarding microbiological standards for ready-to-eat (RTE) food. (The first public consultation was held from 22 August 2017 to 23 October 2017.) Concurrently, then-AVA had also notified the World Trade Organisation (WTO) of the proposed amendments via notifications G/TBT/N/SGP/39/Add.1 and G/SPS/N/SGP/59/Add.1.

Feedback was sought from stakeholders on the proposed revised amendments to the definition of RTE food, removal of limits for total plate count from the Food Regulations, replacement of coliform limits with *Enterobacteriaceae* limits, and the revised format of listing for pathogens.

### **Definition of RTE**

Three companies expressed support for the proposed revised definition of RTE food:

*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.*

Two companies proposed to exclude “chilled and frozen cooked food that requires reheating” from the definition of RTE food, citing examples of frozen cooked food (for example, pizza) which require reheating for longer periods of time for the purpose of cooking and elimination of the associated pathogens. One company also highlighted that from the preparation instructions provided on the labels of frozen food, it is not possible to differentiate between reheating and cooking of such foods. SFA had taken these comments into consideration and will refine the definition of RTE food to exclude “chilled and frozen cooked food that requires reheating”.

Two other companies sought clarification on whether noodles which require cooking before consumption as well as salads labelled with “wash before consumption” would be regarded as RTE. SFA had responded that raw ingredients or food that are meant for further cooking before consumption would not be regarded as RTE food. However, salads that are labelled with “wash before consumption” would be regarded as RTE food.

## **Removal of total plate count limits from the Food Regulations**

There were no objections received on the proposal to remove the limits for total plate count from the Food Regulation, although one company sought clarification on whether testing for total plate count would still be required if the limits were removed from the Regulations, and another company asked if SFA would be publishing guidelines for total plate count.

SFA had responded that it will no longer be a legal requirement for companies to comply with the limits for total plate count for RTE food if the limits are removed from the Regulations. However, companies may wish to check for total plate count as part of their internal process control. SFA had also informed that there are no immediate plans to publish guidelines for total plate count, but may consider doing so in future.

## **Replacement of coliform limits with *Enterobacteriaceae* limits**

Three companies and a foreign government commented that *Enterobacteriaceae* is naturally present at high levels in RTE fruits and vegetables, cheeses (including ripened cheese) and fermented food, and proposed to exclude these food products from the *Enterobacteriaceae* limit as testing will not be useful to indicate their hygiene status. SFA noted the comments and will exclude a number of these food products from the *Enterobacteriaceae* limit. One company also commented that it would be costlier to test for *Enterobacteriaceae*, as compared to coliform.

## **Revised format of listing for pathogens**

There were no objections received on the proposed revised format of listing for pathogens.

## **Other comments received**

### **(a) On units for the proposed microbiological limits**

One company proposed to use MPN/g to enumerate the food pathogen *Vibrio parahaemolyticus*, based on the International Organization for Standardization (ISO) Standard 21872-1:2017, instead of Colony Forming Unit per gram (cfu/g) as proposed in the consultation document. SFA noted the comment, but will adopt cfu/g as the unit for testing of *V. parahaemolyticus*, in line with countries such as Australia, New Zealand, Canada, Ireland and the United Kingdom.

### **(b) Pathogen limits**

One company suggested for the limit of <200 cfu/g for *Bacillus cereus* to be increased to <500 cfu/g. SFA had informed the company that the proposed limit is realistic and is a safeguard to protect the health of consumers in Singapore. Another company sought clarification on whether the proposed amendments will include microbiological standards for norovirus in RTE food. SFA has responded that microbiological standards for norovirus in RTE food had not been considered in this round of amendments.

## **Conclusion**

SFA appreciates the time taken by individuals and organisations to submit feedback and comments which have contributed to the decision-making process, and would like to encourage all food industry members to actively participate in future calls for comments.

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