



Standards - Microbiological Compliance for Dairy Products

Dairy foods that are produced for sale and consumption must be tested to ensure that they conform to the required standards.

This Note identifies the relevant reference documentation and provides clarification on the differences between mandatory and recommended requirements for microbiological testing.

A microbiological testing program is an essential component of any dairy manufacturer's Food Safety Program (FSP). The microbiological testing program needs to be designed to include all of the relevant regulatory requirements and be sufficient to verify the effectiveness of the FSP in preventing end product contamination.¹

Certain microbiological testing requirements and maximum acceptable limits are mandatory and enforceable by law. There are also recommended suitable testing regimes and acceptable microbial limits that are guidelines. The intent of both the mandatory and recommended requirements is to ensure safe food is being produced for sale.

Mandatory requirements

Mandatory requirements for microbiological sampling and testing programs must be incorporated into a company's FSP and the maximum permissible levels of microorganisms in food must be complied with for the food to be considered acceptable for sale and consumption.

The mandatory sampling and testing requirements are listed in Standard 1.6.1 *Microbiological Limits for Food* in the Australia New Zealand Food Authority's Food Standards Code (FSC)². This standard includes the maximum permissible levels of micro-organisms in foods, the numbers of samples that are required to be tested, and the criteria for determining when food poses a risk and should not be offered for sale.

In Victoria, *The Code of Practice for Dairy Food Safety 2002* (CoP)³ is mandated through the Victorian Dairy Act 2000⁴. In addition to the mandatory FSC requirements listed above, this Code has also adopted the *pathogen levels*

specified in the User Guide - *Microbiological Limits for Foods*⁵ as mandatory testing requirement for dairy manufacturers.

The Australia New Zealand Dairy Authorities' Committee (ANZDAC) *Australian Manual for the Control of Listeria 1999*⁶ and the *Australian Manual for the Control of Salmonella 1999*⁷ are also mandatory documents as defined under the CoP. These manuals include detailed information on how to control and prevent *Listeria* and *Salmonella* contamination in processing environments, and also the specific clearance procedure that must be followed in the event of product contamination occurring.

Note. These manuals are currently undergoing review, and the actions required to be taken when pathogens are detected in products may change in the future.



Export Requirements

Products being exported have specific microbiological standards that must be complied with prior to export. The Australian Quarantine and Inspection Service (AQIS) *Export Control (Milk and Milk Products) Orders*⁸ stipulate that every product lot must comply with the Food Standards Code sampling and testing protocol.² Additionally, there may also be importing country specifications that need to be met.

The importing country requirements can change over time, and it is the responsibility of the exporter to ensure that they are aware of the current requirements. Advice and approval of these aspects will need to be obtained through AQIS.

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Guidelines

The ANZDAC *Minimum Sampling Guidelines for Dairy Products 2000*⁹ provides recommendations for implementing a microbiological sampling and testing program appropriate for the various dairy product categories. This is not a mandatory document but is a useful guide, particularly suited to low volume dairy manufacturers.

Summary

It is the responsibility of each individual company to ensure that their microbiological testing program is designed to include all of the mandatory testing requirements, and that the program adopted is robust enough to adequately verify the effectiveness of their FSP.

Further information about sampling and testing can be found in *Dairy Food Safety Note 23 – Microbiological Sampling and Testing of Dairy Products*¹⁰

References

1. Dairy Food Safety Victoria (2006) '*Guidelines for Food Safety: Dairy Food Manufacturers*. Section 5.7: Testing Programs' **Available from:** www.dairysafe.vic.gov.au/pdf/ManufacturingGuidelines.pdf
2. Food Standards Australia New Zealand - Food Standards Code (2007) *Standard 1.6.1 - Microbiological Limits for Food*. **Available from:** <http://www.foodstandards.gov.au/thecode/foodstandardscode/index.cfm>
3. Dairy Food Safety Victoria (2002) '*Code of Practice for Dairy Food Safety*. Section 5: Dairy Manufacturing Premises' **Available from:** www.dairysafe.vic.gov.au/pdf/DFSV_CodeOfPractice2002.pdf
4. Government of Victoria. 'Dairy Act 2000'. Act No. 37/2000 – Part 4 (31) Codes of Practice. **Available from:** http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/PubLawToday.nsf/2184e627479f8392ca256da50082bf3e/4f37812bb762dea1ca2573e2000ad62e!OpenDocument&Highlight=0,dairy
5. Food Standards Australia New Zealand – *User Guides to the New Food Standards Code (2001)* User Guide to Standard 1.6.1 - Microbiological Limits for Food. **Available from:** <http://www.foodstandards.gov.au/thecode/industryuserguides/index.cfm>
6. Australia New Zealand Dairy Authorities' Committee (formerly Australian Dairy Authorities' Standards Committee) (1999) *Australian Manual for the Control of Listeria in the Dairy Industry*. **Available from:** http://www.dairysafe.vic.gov.au/pdf/DFSV_QA311145.pdf
7. Australia New Zealand Dairy Authorities' Committee (formerly Australian Dairy Authorities' Standards Committee) (1999) *Australian Manual for the Control of Salmonella in the Dairy Industry*. **Available from:** http://www.dairysafe.vic.gov.au/pdf/DFSV_QA311143.pdf
8. Australian Quarantine & Inspection Service (AQIS, 2005) '*Export Control (Milk and Milk Products) Orders 2005*. Schedule 6, Part 1: Product Standards for milk, milk products and ingredients' **Available from:** www.comlaw.gov.au/comlaw/management.nsf/lookupindexpagesbyid/IP200510269
9. Australia New Zealand Dairy Authorities' Committee (formerly Australian Dairy Authorities' Standards Committee) (2000) *Minimum Sampling Guidelines for Dairy Products*. **Available from:** <http://www.dairysafe.vic.gov.au/pdf/Minimum%20Sampling%20Guidelines%20for%20Dairy%20Products.pdf>
10. Dairy Food Safety Note 23 - Microbiological Sampling and Testing of Dairy Products **Available from:** <http://www.dairysafe.vic.gov.au/pdf/Dairy%20Safety%20Note%2023%20-%20Micro%20Sampling%20%20and%20Testing.pdf>

Further information

Other Dairy Food Safety Notes are available from www.dairysafe.vic.gov.au

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