

ADDENDUM to FINAL REPORT – 19 February 2010

REVIEW OF THE CURRENT TESTING PROTOCOLS FOR IMPORTED SEAFOOD PRODUCTS

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Addendum to CSIRO Report reference R-661-03-11

For:
**Australian Government Department of Agriculture, Fisheries and Forestry,
Australian Quarantine and Inspection Service**



Cover page photographs from: Timesonline, Fishing Fury, Dave Ryan photography, abc.net, Fishing Resource, redgreenblue.org

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REVIEW OF THE CURRENT TESTING PROTOCOLS FOR IMPORTED SEAFOOD PRODUCTS

ADDENDUM – 19 FEBRUARY 2010

A Review of the Current Testing Protocols for Imported Seafood Products” (further referred to as “the Review”, report dated 22 December 2009) was conducted in response to the project brief issued by the Australian Government Department of Agriculture, Fisheries and Forestry, Australian Quarantine and Inspection Service (AQIS).

The aim of the project was to review the existing approach to the testing protocols for seafood imported into Australia and, following consideration of international practices and stakeholder opinion, to make recommendations for an optimal approach for food safety risk management and testing of imported seafood.

This addendum has been prepared to provide further information and analysis on Term of Reference 5: “Identify relevant validated test methods, if there is laboratory capability to undertake relevant testing and any gaps”. Its inclusion in the brief was to ensure that if particular commodity:hazard combination tests were recommended, this was done with consideration given to the ability to conduct the tests in Australia.

A Food Standards Australia New Zealand (FSANZ) review of the current provisions of the Australian Food Standards Code (AFSC; the Review section 3.2.1) is strong evidence that the current provisions are sufficient to address known risks as discussed in the Review. However, the Review recommends that FSANZ surveillance activities could be augmented by more coordinated planning to monitor and identify unknown or emerging risks (recommendation 6).

Section 7 of the Review recommends that AQIS should implement a mix of risk management options for seafood imported into Australia and that these options should be commensurate with the risk of the seafood. More specifically, greater use should be made of through chain assurance systems via foreign government certification arrangements and compliance agreements with importers of risk seafood.

As a consequence of the FSANZ review and the seafood import protocols review recommendation 6, no additional seafood commodity:hazard combinations were identified for testing. It should be noted that this review recommends moving to greater reliance on systems assurances rather than end product testing. Hence recommendations in respect of additional tests, methodology and laboratory capability were obviated.

The Review endorses that FSANZ continue to apply a risk based approach to prioritise seafood commodity:hazard combinations for control and/or testing under the Imported Food Program

It is highly probable that other seafood commodity:hazard combinations will be recommended by FSANZ for testing as a result of future risk assessment and surveillance work. Two aspects must be considered when any commodity:hazard combinations are recommended for testing although should not entirely direct a decision on whether to test for that particular hazard:

- Does a validated test method exist? [e.g. Australian Standard (AS) or International Standards Organisation (ISO) method]
- Does Australia have the capability to conduct this test?

It is also probable that new tests will be required to investigate concerns that arise about potential emerging hazards.

In the event that FSANZ identify new commodity:hazard combinations for testing, their advice to the Imported Food Program should also include the appropriate and validated test methods. Where no validated test method exists, a policy should exist to address the application or development of a suitable test method in Australia including:

- Does a method exist that is effective at detecting the hazard?
- What should/could be done if no Australian or ISO standard method exists?
- What should/could be done if reactive testing is required and no Australian capability exists?

Thus, an additional recommendation can be made here – that AQIS and FSANZ, in consultation with other relevant agencies and Australian appointed analysts, develop a policy and procedures to address Australian capability where a validated test method does not exist. Any policy/procedure should remain in line with the existing Review recommendation 6, that the inspection scheme allows for flexibility in the type of test(s) conducted and has the capacity for responsiveness to emerging/perceived unsafe and/or unsuitable food.

Initial steps to address this could involve ongoing surveillance and identification of tests that are conducted internationally, but not identified for seafood import testing in Australia. This would include identification of whether such testing is conducted using a validated test method. Such analysis could include tests such as those identified in Section 4 of the Review, in which, some tests conducted on seafood imported into other countries are identified but are not included in the testing under the Imported Food Program. For example, New Zealand tests for ciguatera toxin, metal contaminants incl. mercury and pathogenic viruses, where Australia does not.



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