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Food Safety Schemes

Verification and surveillance program report July 2009 to June 2014

November 2014

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Content

Executive Summary

The Food Authority's microbiological testing verification program involves ongoing random sampling and testing of selected ready-to-eat (RTE) products manufactured in NSW under the Regulation. The purpose of the program is to provide a snapshot of the overall compliance of license holders to microbiological testing requirements. Such testing complements other audit and investigation procedures, which taken together provides the Food Authority with information to make determinations on the overall effectiveness of regulation and industry performance. This program supports the NSW Food Authority's thru-chain approach to food safety in the State and complements the audit and inspection, target food survey and education programs to maintain the high level of compliance by NSW food industry with food regulation.

Data summarised in this document comprises results obtained from the Food Authority's microbiological testing verification and surveillance program from July 2009 to June 2014.

Key findings were:

- A total of 1271 ready-to-eat (RTE) food products were tested and 96% of them complied with the regulatory requirements.
- NSW dairy products demonstrate 95% compliance with regulatory requirements.
- A total of 97% of RTE meat products complied with the regulatory requirements. In addition, hygienic status of NSW Uncooked Comminuted Fermented Meats (UCFM) products has improved significantly since the 2001 requirements took effect.
- All of the NSW manufactured fresh cut fruits & vegetables and unpasteurised juice tested complied with the regulatory requirements, and 92% of sprouts were compliant.
- The majority (94%) of high risk seafood products, e.g. raw oysters, bottled oysters, and cooked/smoked seafood was compliant.
- *Salmonella* was found in 100% of farms included in the egg farm verification program. The proportion was higher than that obtained in the baseline evaluation survey in 2010/11. However, only six farms were included in the verification program and 49 were part of the baseline. In addition, *Salmonella* was also found in 67% of egg grading facilities. This finding reinforces a thru-chain approach to managing food safety risks associated with poorly handled raw-egg based products over the past five years.

When samples were found to be non-compliant, when deemed necessary, the licensee was inspected by a Food Safety Officer to investigate the reason for non-compliance and rectify the issue. Improvement Notices were served to seven licensees following inspections resulting from non-compliant results.

In conclusion, the data presented in this report has provided an assurance that the majority of high risk RTE products manufactured in NSW are safe. All of the non-compliant products were caused by a breakdown in the manufacturing practices, and not by the intrinsic property of the food itself. Ongoing testing is still needed to ensure that food safety and compliance information for NSW products produced under the Regulation remains up to date.

Introduction

The Food Regulation 2010 (the Regulation) underpins the Food Authority's and local councils' food regulatory work, which aims to reduce the incidence of foodborne illness linked to certain food sectors in NSW.

The Regulation includes minimum requirements for six food industry sectors that have been identified as high risk. Each is referred to as a Food Safety Scheme (Scheme):

- Meat Food Safety Scheme
- Dairy Food Safety Scheme
- Seafood Food Safety Scheme
- Plant Products Food safety Scheme
- Vulnerable Persons Food Safety Scheme
- Egg Food Safety Scheme

Food businesses subject to the Regulation must hold a NSW Food Authority license and comply with the food safety requirements, such as an audited HACCP-based food safety programs.

Additionally, products produced under each Scheme, with the exception of Vulnerable Persons, must comply with analytical testing requirements set out in the NSW Food Authority Food Safety Manual (NSW Food Authority, 2013a).

Verification and Surveillance Program

The Authority's verification program involves ongoing random sampling and testing of selected ready-to-eat (RTE) products manufactured in NSW under the Regulation. The purpose of the program is to provide a snapshot of the overall compliance of license holders with regard to microbiological testing requirements. Such testing complements other audit and investigation procedures, which taken together provides the Food Authority with information to make determinations on the overall effectiveness of regulation and industry performance.

In addition, a surveillance program for egg farms and eggs grading facilities was introduced in July 2013 to gather information on the prevalence of *Salmonella* on these premises.

Materials and Methods

This report outlines the microbiological verification and surveillance data from July 2009 to June 2014. Samples were collected from five industry sectors: dairy, meat, plant products, seafood, and eggs (only for 2013/14 period). Where possible, data was compared to results from selected market analysis (food survey) done by other states and where applicable 2004 – 2009 verification data.

For the ready-to-eat (RTE) food samples, the results from the testing were analysed against the requirements outlined in the NSW Food Safety Schemes Manual (NSW Food Authority, 2013a). The microbiological limit for products included in the program can be found in Appendix 1.

The majority of samples were collected from manufacturers, while some of them were from retail premises, all around NSW.

This report explores five of the six industry sectors that the NSW Food Regulation 2010 covers. There is only limited information available for two of the industry sectors due to:

- There is no routine analysis of food or water currently required by the Food Authority for vulnerable persons businesses. A pre-regulation survey was conducted in 2004 and a baseline evaluation was conducted in 2009. The full report is available on the Food Authority's website (NSW Food Authority, 2010).
- The Egg Scheme was only implemented in June 2010. In the Manual, there is a testing requirement for egg products but there were not sufficient manufacturers of these products at the time of sampling. Thus, no samples have been collected. Effort was placed at gaining more information on-farm and at egg grading facilities.

Results and Discussion

Overall results

From July 2009 to June 2014, a total of 1271 RTE food samples were tested. 96.1% of samples tested complied when compared with the requirements outlined in the Manual. The number of RTE food samples collected in each financial year and the corresponding number of non-compliant samples is outlined in Figure 1.

In addition, in 2013/14, 280 egg and environmental samples were collected as part of the egg surveillance program. The number of samples collected per industry sector for each financial year is outlined in Figure 2. The breakdown of type of samples in each industry sector can be found in Appendix 1.

Figure 1. Number of RTE food samples collected and corresponding number of non-compliant samples

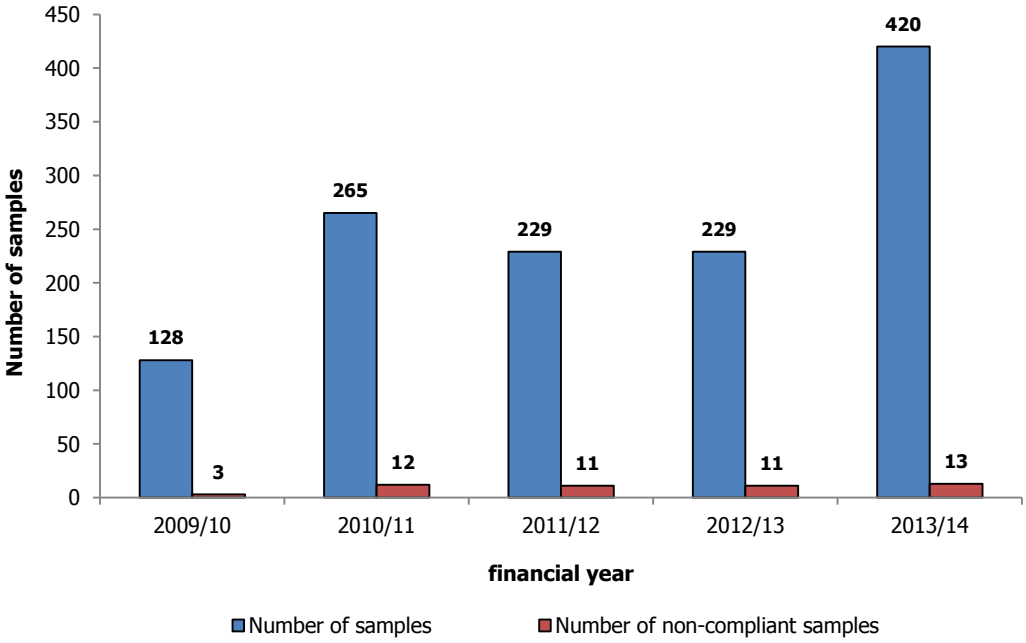
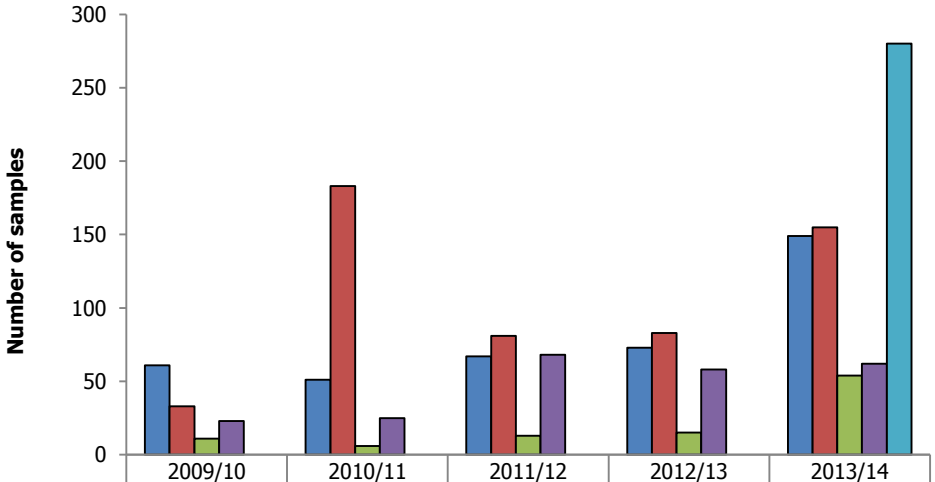


Figure 2. The number of samples for each industry sector in each financial year



	2009/10	2010/11	2011/12	2012/13	2013/14
Dairy	61	51	67	73	149
Meat	33	183	81	83	155
Plant products	11	6	13	15	54
Seafood	23	25	68	58	62
Eggs	0	0	0	0	280

Dairy Meat Plant products Seafood Eggs

Dairy

From July 2009 to June 2014, 401 dairy products from NSW licensees were analysed against the regulatory requirements. A total of eighteen samples (4.5%) were found to be non-compliant (Table 1) which is a higher proportion when compared to 2006 – 2009/2010 periods; which was 2% (5/275).

The non-compliant samples included:

- Twelve cheeses, one dairy dessert, one dairy-based dip and one cream sample contained high level of *E. coli,* ranging from 9 to 4,600 cfu/g.
- One cheese sample was positive for *L. monocytogenes.*
- Two cheese samples contained high level of *E. coli* and coagulase positive staphylococci (CPS). One sample had greater than 11,000 cfu/g of *E. coli* and 86,000 cfu/g CPS. The other one had 23 cfu/g of *E. coli* and 300 cfu/g CPS.

Table 1. Dairy products tested and level of non-compliance

Product group	Number of samples tested	Number of non-compliant samples (%)
Butter	8	-
Cheese	236	15 (6.4%)
Cream	8	1 (12.5%)
Dairy desserts & dips	21	2 (9.5%)
Dried milk powder	1	-
Goats milk (unpasteurised)	6	-
Ice cream/gelato	105	-
Kashta	1	-
Liquid milk products (pasteurised)	15	-

The level of non-compliant samples was lower than that obtained in the SA Health survey. In 2008 – 2009, SA Health tested 85 samples of cheeses and 20 samples of dairy dips for coliforms, coagulase positive staphylococci, *E. coli, Salmonella* and *Listeria monocytogenes*. A total of ten cheese samples (11.8%) found to be non-compliant due to elevated level of *E. coli*, ranged from 3.6 to 43 cfu/g (SA Health, 2009).

Meat

From July 2009 to June 2014, 535 pre-packaged ready-to-eat meat products from NSW licensees were analysed against the regulatory requirements (Table 2). A total of thirteen samples (2.4%) were found to be non-compliant however none of the UCFM samples were found to be non-compliant.

The non-compliant samples were:

- Eight RTE meat samples contained *L. monocytogenes*.
- Five RTE meat samples contained elevated level of *E. coli*, ranging from 4 to 43 cfu/g.

Table 2. Meat products tested and level of non-compliance

Product group	Number of samples tested	Number of non-compliant samples (%)
RTE meat & poultry, including pate	471	13 (2.8%)
Uncooked comminuted fermented meat (UCFM)	64	-

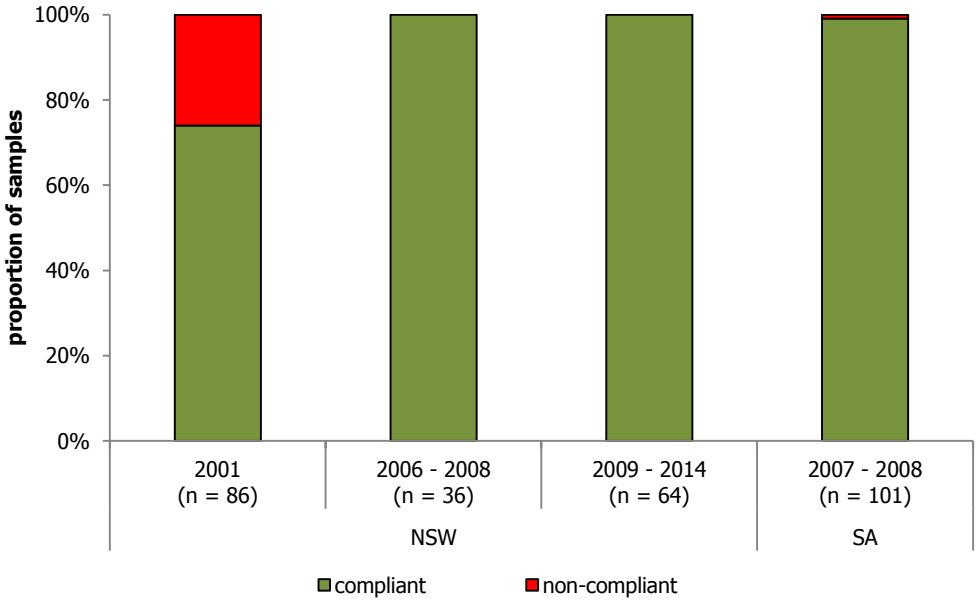
Uncooked Comminuted Fermented Meat (UCFM) products

A number of regulatory interventions have been introduced to control the process for manufacturing UCFM in Australia, and particularly NSW. These interventions were introduced in response to outbreaks such as the South Australian Garibaldi *E. coli* O111 outbreak where 173 people were affected by contaminated mettwurst and a young child died (Cameron et al, 1995).

- In 2003, Standard 1.6.1 Microbiological limits for food of the Australia New Zealand Food Standards Code was amended to include new requirements for UCFM products.
- In November 2007, the national Primary Production and Processing Standard for Meat introduced additional verification and validation requirements for businesses producing UCFM products.
- The NSW Food Safety Schemes Manual (NSW Food Authority, 2013a) also has a specific requirement that UCFM products should not contain *E. coli* greater than 3.6 cfu/g.

In NSW, the UCFM samples collected through the Food Authority's verification program and during the 2008 survey show marked improvement in the *E. coli* levels compared to those tested in 2001 (Figure 3).

Figure 3. Proportion of non-compliant UCFM samples in regards to *E. coli*



- In 2001, 86 UCFM samples were collected from NSW processors and tested for *E. coli*, pH and water activity (a_w). A total of 22 products (26%) did not comply with the limit for *E. coli* levels prescribed in the Code.
- From 2006 to 2008, 36 samples were collected as part of a survey and verification testing. All samples complied with the microbiological limits for *E. coli* prescribed in the Code.
- From July 2009 to June 2014, 64 samples were collected as part of the verification program and they all complied with the *E. coli* limit prescribed in the NSW Food Safety Scheme Manual.
- In addition, in 2007/08, 110 UCFM samples from 22 manufacturers across Australia were tested by SA Health. Locally manufactured products were collected from the manufacturing site, while inter-state products were purchased at retail. One sample (0.9%) was found to contain *E. coli* greater than 3.6/g and *Salmonella*. As a result, the product was recalled (SA Health, 2008).

Plant Products

From July 2009 to June 2014, 99 plant products from NSW licensees were analysed against the regulatory requirements (Table 3). A total of four sprout samples (4%) were found to be non-compliant due to elevated level of *E. coli*, ranging from 23 to 9,300 cfu/g.

Table 3. Plant products tested and level of non-compliance

Product group	Number of samples tested	Number of non-compliant samples (%)
Fresh cuts (fruits & vegetables)	37	-
Sprouts	50	4 (8%)
Unpasteurised juice	12	-

In 2008/09, SA Health also did some work in this area testing 50 pre-packaged fresh cut vegetables sold at retail for coliforms, *E. coli, Salmonella*, and *L. monocytogenes*. No pathogenic organisms were detected and all samples contained *E. coli* under the limit of detection of 3 cfu/g. In addition, SA Health also tested sprouts as part of their raw vegetable survey. From 2009 to 2012, eight sprouts samples were tested and *E. coli* was not detected in any of them (SA Health, 2010, 2011, 2012).

Seafood

From July 2009 to June 2014, 236 cooked/smoked seafood, opened oysters and packaged oysters from NSW licensees were analysed against the regulatory requirements (Table 4). A total of fifteen samples (6.4%) were found to be non-compliant, a higher level of non-compliance than that obtained from 2005 to June 2009 where a total of 101 samples were tested and all were compliant.

The non-compliant samples were:

- Two smoked fish contained *L. monocytogenes*.
- Seven opened oyster samples and six packaged oyster samples contained elevated level of *E. coli*, ranging from 4.3 to 240 cfu/g.

Table 4. Seafood products tested and level of non-compliance

Product group	Number of samples tested	Number of non-compliant samples (%)
Cooked/smoked seafood	180	2 (1.1%)
Opened oysters	37	7 (19%)
Packaged oysters	19	6 (3.2%)

Eggs

From 2000 to 2010 a 28% increase in foodborne *Salmonella* illness, mainly due to the inappropriate handling of raw eggs, was observed nationally. The ultimate aim of the Egg Food Safety Scheme is to reduce the incidence and potential for foodborne illness from eggs and egg products. A baseline evaluation was carried out in 2010 – 2011 and it provided clear justification for the introduction of regulatory food safety measures for the egg industry in NSW since *Salmonella* was detected on close to half of the farms surveyed. Also, many of the *Salmonella* types that predominated on farms also predominate amongst isolates from human cases notified to NSW Health. The full report can be found on the Food Authority's website (NSW Food Authority, 2013b).

While there is sufficient evidence in scientific literature to show that the presence of *Salmonella* in the egg laying environment does not automatically infer a high prevalence on whole eggs offered for sale, it does highlight increased risk associated with cross contamination of *Salmonella* from the environment to whole eggs. Thus, the egg farm surveillance program was introduced in July 2013. Samples were collected from *egg primary producers* and *egg primary producers with additional activities* license holders.

From each shed a series of environmental samples were collected: stock feed, boot swabs and faeces. In addition, one dozen of ungraded eggs were also collected from each shed. For any larger egg farm, a maximum of four sheds were randomly selected for sampling. For *egg primary production with additional activities* licensees, the egg grading facility and practices were also assessed. All samples were tested for *Salmonella* only.

Detection of *Salmonella* in environmental samples collected from sheds was not unexpected. However, follow-up action was taken if samples were positive for *Salmonella* and the business' hazard management practices were considered inadequate. In addition, *Salmonella* found on food contact surfaces within an egg grading facility was indicative of a problem with cleaning and sanitation practices. In the event of *Salmonella* positives in this area, an officer from the Food Incidence Response & Complaints team might consider a re-visit of the business, re-sampling and conduct appropriate enforcement actions according to the Food Authority Enforcement policy.

From July 2013 to June 2014, six egg farms and three grading facilities were visited and 280 samples were collected. The type and number of samples are outlined in Table 5. *Salmonella* on egg surface and the inside of the eggs were tested separately.

Table 5. The number of samples tested as part of the egg surveillance program and the level of *Salmonella* detection

Type of samples	Number of samples tested	Number of samples with *Salmonella* detected (%)
Eggs – content	29	-
Eggs – surface	51	-
Environmental swabs	144	49 (34%)
Faeces	28	1 (3.6%)
Stock feed	28	-

All farms included in the surveillance program had at least one positive environmental *Salmonella* sample. The baseline survey found that under half of the farms (22/49) sampled had at least one positive sample for *Salmonella*, however, more farms were included in the baseline survey. Overall, *Salmonella* prevalence was higher for environmental samples (swabs and faeces) than samples of farm/shed input (stock feed), which was similar to the finding of the baseline survey (NSW Food Authority, 2013b).

In addition, two of the three grading facilities had at least one *Salmonella* positive sample however, none of the egg samples were positive for *Salmonella*.

A total of 25 samples that showed positive for *Salmonella* were serotyped[1]. Nine samples (36%) were found to contain *S*. Typhimurium, singly or together with other serotypes. A number of other serotypes were also found namely *S*. Bareilly (10), *S*. Infantis (2), *S*. Montevideo (2), *S*. Ohio (1), *S*. Singapore (1), and *S*. subs 1 ser 4,5:-:- (1).

[1] Two isolates per sample were sent for serotyping testing.

Follow-up actions

When samples were found to be non-compliant, if deemed appropriate by Manager Audit Systems and Verification, the licensee was inspected by the Food Safety Officer to investigate the non-compliance and rectify the issue. The Food Safety Officer employed a graduated and proportionate approach to the application of enforcement tools upon these food businesses according to the NSW Food Authority Enforcement Policy (NSW Food Authority, 2014). As a result, Improvement Notices were served to seven of the licensees with non-compliant samples.

Some of the issues observed during inspections include:

- Lack of records e.g. production date for an implicated batch was not recorded, labelling for bulk products was absent, and temperature of product receipt was absent
- Construction and maintenance issues e.g. condensation on ceiling of cold room which could drip onto products, and no separation between raw and cooked products to prevent cross-contamination
- Lack of temperature control e.g. display refrigerator at the retail section was at 10˚C
- Inappropriate food handling practices e.g. product was not processed in the production room but in a room not designed for food production
- Cleaning and sanitation issue e.g. food residue was observed on a cleaned & sanitised basket, slicer was not cleaned after being used, no soap or paper towel in the production area, and no sanitiser during inspection

In conclusion, for all of the non-compliant samples there was a breakdown in the manufacturing processes observed. This likely contributed to the products' non-compliance and was not due to the intrinsic property of the food itself.

The microbiological verification program is a key component of the Food Authority's thru-chain approach to food safety regulation in NSW. It complements the audit and inspection program, targeted survey and education programs to maintain market and consumer confidence that food produced and sold in NSW is safe to eat.

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Appendix 1.

Testing requirements for end products produced under each scheme according to the Food Regulation 2010.

Dairy

Products	Tests	Limit
butter (salted or unsalted)	*E. coli*	<10 cfu/g
butter+ other ingredients post pasteurisation	*E. coli* *Salmonella*	<10 cfu/g Not Detected/25g
cheese – hard	*E. coli* CPS	<10 cfu/g <100 cfu/g
cheese - soft (moisture content >39%, pH >5.0)	*E. coli* CPS *L. monocytogenes* *Salmonella*	<10 cfu/g <100 cfu/g Not Detected/25g Not Detected/25g
cheese + other ingredients post pasteurisation	*E. coli* CPS *L. monocytogenes* *Salmonella*	<10 cfu/g <100 cfu/g Not Detected/25g Not Detected/25g
cream (pasteurised)	*E. coli* *L. monocytogenes*	<1 cfu/ml Not Detected/25ml
dairy dessert & dips (pH >4.5) (e.g. custard, chocolate mousse)	*E. coli* CPS *L. monocytogenes*	<10 cfu/g <100 cfu/g Not Detected/25g
dairy dessert + other ingredients post pasteurisation (pH>4.5)	*E. coli* CPS *L. monocytogenes* *Salmonella*	<10 cfu/g <100 cfu/g Not Detected/25g Not Detected/25g
dried milk powder	*Salmonella*	Not Detected/25g
kashta	*E. coli* *L. monocytogenes*	<10 cfu/g Not Detected/25g
frozen ice cream and edible ices (e.g. gelato)	*E. coli* *L. monocytogenes*	<10 cfu/g <100 cfu/25g
frozen ice cream and edible ices + other ingredients post pasteurisation	*E. coli* *L. monocytogenes* *Salmonella*	<10 cfu/g <100 cfu/g Not Detected/25g
refrigerated ice cream mixes[Error! Bookmark not efined.] (e.g. soft serve mix)	*E. coli* *L. monocytogenes*	<10 cfu/g Not Detected/25g
pasteurised liquid milk product	*E. coli* *L. monocytogenes*	<1 cfu/g Not Detected/25g
unpasteurised goat milk	*E. coli* *L. monocytogenes* *Salmonella* *Campylobacter*	<3 cfu/ml Not Detected/25g Not Detected/25g Not Detected/25g

Meat

Meat businesses	Products	Tests	Limit
Meat processing – RTE products & UCFM products	RTE meat & poultry products	*E. coli* *L. monocytogenes* *Salmonella*	<3 cfu/g Not Detected/25g Not Detected/25g
	sliced or whole packaged RTE meat products (vacuum packed or MAP)	*E. coli* *L. monocytogenes* *Salmonella*	<3 cfu/g Not Detected/25g Not Detected/25g
	whole packaged RTE meat product that receives a post pack pasteurisation step	*E. coli* *L. monocytogenes* *Salmonella*	<3 cfu/g Not Detected/25g Not Detected/25g
	uncooked comminuted fermented meat (UCFM)	*E. coli*	<3.6 cfu/g
Meat retail – RTE products & UCFM products	sliced or whole packaged RTE meat products (vacuum packed or MAP)	*L. monocytogenes*	Not Detected/25g
	whole packaged RTE meat product that receives a post pack pasteurisation step	*L. monocytogenes*	Not Detected/25g

Plant products

Products	Tests	Limit
seed sprouts (finished products)	*E. coli*	<100 cfu/g
fresh cut fruit	*L. monocytogenes* *Salmonella*	Not Detected/25g Not Detected/25g
fresh cut vegetables	*L. monocytogenes* *Salmonella*	Not Detected/25g Not Detected/25g
unpasteurised juice	*Salmonella*	Not Detected/25g

Seafood

Product to be tested	Tests to be conducted	Limit
opened oysters	*E. coli*	<2.3cfu/g
bottled oysters	*E. coli*	<2.3cfu/g
Cooked/smoked seafood	*L. monocytogenes*	Not Detected/g

Appendix 2. Type of samples in each industry sector

		Number of samples (non-compliant)					
		2009/10	2010/11	2011/12	2012/13	2013/14	Total
Dairy	Butter	4	-	1	1	2	8
	Cheese	37 (1)	31 (2)	50 (4)	54 (3)	64 (5)	236 (15)
	Cream	2	1	1	1 (1)	3	8 (1)
	Dairy desserts & dips	2 (1)	3	2	6	8 (1)	21 (2)
	Dried milk powder	1	-	-	-	-	1
	Goats milk (unpasteurised)	4	-	-	1	1	6
	Ice cream / gelato	4	16	11	8	66	105
	Kashta	-	-	-	1	-	1
	Liquid milk products (pasteurised)	7	-	2	1	5	15
Meat	RTE meat & poultry, including pate	26	168 (8)	70 (2)	67	140	471 (13)
	Uncooked Comminuted Fermented Meat (UCFM)	7	15	11	16	15	64
Plant products	Fresh cuts (fruits & vegetables)	2	2	5	-	28	37
	Sprouts	7 (1)	1	6 (1)	11	25 (2)	50 (4)
	Unpasteurised juice	2	3	2	4	1	12
Seafood	Cooked/smoked seafood	22	20	51	41 (1)	46 (1)	180 (2)
	Opened oysters	0	1	10 (2)	10 (4)	16 (1)	37 (7)
	Packaged oysters	1	4 (2)	7 (2)	7 (2)	-	19 (6)

NSW Food Authority
6 Avenue of the Americas
Newington NSW 2127
PO Box 6682 Silverwater NSW 1811
Phone 1300 552 406
Fax 02 9647 0026
www.foodauthority.nsw.gov.au