

Annual Food Testing Report 2024-2025

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Introduction

The NSW Food Authority's primary objective is to provide consumers in NSW with safe and correctly labelled food.

To support this objective the Food Authority regularly conducts testing of food products to ensure compliance with regulatory requirements, as part of foodborne illness investigations and to gather information to identify and respond to food safety issues. The Food Authority also undertakes scientific surveillance projects to identify and better understand food safety issues and risks in NSW. The data obtained in these surveillance projects allows the Food Authority to identify and respond to key food safety issues and develop systems and processes to manage the prevention of foodborne illness effectively and maintain food safety.

In 2024-2025, there were 2 primary testing providers to the Food Authority, Mérieux NutriSciences AQ (MNAQ, formerly known as BVAQ) and Symbio Laboratories. This is because the provision of testing services to the Food Authority underwent a competitive tender process in 2024, with Symbio Laboratories as the successful laboratory. Symbio Laboratories commenced as the primary testing provider in December 2024. Prior to that, MNAQ was the primary testing provider. Testing services provided by MNAQ and Symbio Laboratories include microbiological, chemical, foreign object identification, allergen contamination and nutritional composition. MNAQ has had accreditation from the National Association of Testing Authorities (NATA) since 1961, and Symbio Laboratories has had NATA accreditation since 1973.

At the end of each financial year, the Food Authority reports on the testing conducted by the Food Authority's primary testing provider and by other laboratories. Other laboratories used in 2024-2025 included Elizabeth Macarthur Agricultural Institute (EMAI) for microbiological analyses and NSW Health Pathology for serotyping and whole genome sequencing.

Why test?

Samples are submitted for testing for reasons such as hygiene assessment, foodborne illness investigation, verification of food safety programs and for research purposes. Testing results are then used to:

- ensure compliance with regulatory requirements
- assist with the development of food regulatory framework
- assist with the evaluation and review of regulations
- assist with enforcement actions
- respond to incidents that occur in the industry
- provide scientifically based industry communication, training and advice
- provide scientifically based consumer advice and information
- assist local government with concerns and complaints
- assist with the development of emergency management framework.

A year in review

Between 1 July 2024 and 30 June 2025, a total of 2,126 samples were submitted for testing: 1,248 samples were submitted to MNAQ and Symbio Laboratories where 6,599 individual tests were conducted, and 878 samples were submitted to other laboratories where 2,719 individual tests were conducted (Table 1). Sample types analysed included meat, seafood, shellfish, dairy, plant products, packaged food, eggs and environmental samples (for example swabs). Many samples were submitted for multiple tests which may have included both chemical profiling and microbiological assessment. Over 60 different types of tests were performed including microbiological assessment, chemical assessment, pH, water activity and allergens.

Table 1. Number of samples per category

Category	Number of samples
Verification programs	443
Research and targeted surveillance projects	265
Food safety compliance	1,418
Total	2,126

Serotyping is a process that identifies a subspecies by its distinctive surface structures. *Salmonella* subspecies are distinguished by the chemical make-up of the 'O' antigen (outermost surfaces of the bacterial cell) and the protein content of the 'H' antigen (part of the bacterium's flagella). Each subspecies has a unique 'O' and 'H' combination. For example, the serotyping result for *Salmonella* Infantis is 6,7:r:1,5 and for *Salmonella* Typhimurium, the result is 1,4,5,[12]:i:1,2.

Whole genome sequencing (WGS) is a process where the unique genome of a microorganism, its DNA (deoxyribonucleic acid) sequence, is determined. The genome sequence of one microorganism can be compared with that of another to determine how closely related they are. This is of particular use when investigating foodborne illness outbreaks as it can link bacteria isolated from suspected foods with isolates from patients' specimens.

In NSW, all clinical and environmental *Listeria monocytogenes* isolates are analysed by WGS to determine their relatedness and search for clusters of illness and potential sources. Similarly, all isolates of *Salmonella* Typhimurium and *Salmonella* Enteritidis detected from the Food Authority sampling are sequenced for trends and comparison with clinical isolates for cluster identification. Other *Salmonella* serovars or foodborne pathogens are sequenced where there is a strong need (such as an increase in human cases in NSW and/or Australia).

From 1 July 2024 to 30 June 2025, 41 samples were submitted to NSW Health Pathology for identification by serotyping and WGS. These samples were *Salmonella*, *Listeria monocytogenes* or *Escherichia coli* bacterial isolates from food or environmental samples that had been submitted for testing due to a foodborne illness investigation, a verification program or a surveillance program. These 41 bacterial isolate samples are in addition to the sample numbers in Table 1 as they arise from testing of food or environmental samples accounted for in the sample numbers in Table 1.

Verification programs

Food Safety Schemes verification program for ready-to-eat (RTE) products

The Food Safety Schemes verification program monitors RTE food that is produced under the NSW Food Safety Schemes (the Schemes).

Samples collected as part of this program include dairy, meat, plant products and seafood. RTE foods that were manufactured or packaged under the Schemes were purchased from retail outlets or collected from the manufacturers and tested against the requirements set out in the Food Safety Schemes Manual.

Between 1 July 2024 and 30 June 2025, a total of 33 samples were randomly collected from retailers and manufacturers and submitted for testing (Table 2). The number of samples collected was less than the previous year as the program was paused while undergoing a review.

All samples were compliant.

Table 2. Number of samples analysed for the Food Safety Schemes verification program

Scheme	No. of samples tested	No. of non-compliant samples
Dairy	20	0
Meat	8	0
Plant products	3	0
Seafood	2	0
Total	33	0

UCFM verification program

Uncooked Comminuted Fermented Meat (UCFM) is a comminuted meat product manufactured by a series of processes including fermentation and maturation (with smoking and/or heat treatment as optional steps). In addition, the final product has not had its core temperature maintained at 65°C for at least 10 minutes or an equivalent combination of time and higher temperature during production.

In NSW, all UCFM products for sale must be produced in accordance with Standard 4.2.3 of the Food Standards Code (the Code) and the NSW Food Regulation 2025.

The Food Authority requires each UCFM to be manufactured in accordance with an approved pro forma, which is a documented and verified manufacturing process. Verification testing is required for one sample from each of the first 2 batches of a product manufactured under a new pro forma. The 2 samples must be submitted to the Food Authority for testing. From 1 July 2024 to 30 June 2025, a total of 106 UCFM samples were submitted for verification testing. All samples were microbiologically satisfactory.

Manufacturers and Wholesalers verification program

The Manufacturer/Wholesaler Food Inspection Program (MWIP) was introduced to ensure that food businesses not covered by the Food Authority's licensing or local government inspections are meeting their legal responsibilities in keeping food safe for consumers. Businesses covered in the MWIP are businesses that produce and sell foods by wholesale with limited or no retail sales business component. These businesses may include home-based businesses. Information about this program can be found in the Food Authority's website.

An ongoing verification program for this sector was introduced in July 2022. The program aims to provide a snapshot of the microbiological quality and/or the presence of chemical contaminants in high-risk products manufactured by businesses under the MWIP. The data collected throughout this program will be used to gauge the current situation and determine whether a larger or more targeted survey needs to be conducted in the future.

Due to the variety of products produced by businesses in this sector, each financial year focuses on 3 to 4 product categories only. For 2024-2025, sampling was focused on:

- alternative milk products – these products have never been surveyed before
- fresh noodles and pasta – the inclusion of these products is used to gauge the current situation after the 2016 project
- plant-based food products – the inclusion of these products is to gauge the current situation after the 2020 survey

Alternative milk products

- A total of 77 alternative milk products (For example, oats, almond, coconut, rice, and soy beverages) were tested for a range of microorganisms.
- 76 products (98.7%) were categorised as good or acceptable. One product was categorised as unsatisfactory due to an elevated level of Standard Plate Counts, but no pathogenic organism was detected.
- Of the 77 labels assessed, 2 had non-compliant nutritional claims. Advisory letters were sent to the manufacturers notifying them of the particular Food Standards Code breach as well as information to assist the business with food labelling requirements.

Fresh noodles and pasta

- A total of 121 fresh noodles and 20 fresh pastas were tested for a range of microorganisms and preservatives. All products must be cooked before consumption.
- For 139 products (98.6%), no pathogenic organisms were detected. One product had an elevated level of *B. cereus*, and another product had *L. monocytogenes*. Since the products must be cooked, no recall was initiated, but the manufacturers were informed of the results.
- Of the 140 products tested for preservatives, 30 of the fresh noodle products contained either a non-permitted preservative (benzoic acid) or a permitted preservative (sorbic acid) above the prescribed limit, or both.
- Of the 138 labels assessed, 55 (40%) were found to be non-compliant.
- Follow-up actions taken included inspection and/or warning letter.
- The verification testing results highlighted common issues in this industry and as a result, a project will be undertaken in 2026 to evaluate and address the identified non-compliances.

Plant-based food products

- A total of 82 plant-based food products were tested for a range of microorganisms. Six products were RTE and the rest of the products required reheating or further cooking before consumption.
- All the RTE products were categorised as good. For the non-RTE products, no pathogenic organisms were found in 73 (96.1%) of the products. *L. monocytogenes* was detected in 3 products. Since the products were not RTE, no recall was initiated but the results were brought to the attention of the company. In addition, yeast was also detected at high levels in a further 10 samples.
- Of the 82 labels assessed, 10 (12.2%) were found to be non-compliant. Advisory letters were sent to the manufacturer or importer of the products, notifying them of the particular Food Standards Code breach as well as information to assist the business with food labelling requirements.

Research and targeted projects

Pilot survey of trans fats

The Pilot Survey of Trans Fats is measuring levels of trans fatty acids in the Australian and New Zealand (NZ) food supplies, with a focus on partially hydrogenated oils in processed foods. The work will contribute to the policy and regulatory deliberations for improving the composition of the food supply in relation to trans fats.

A total of 154 samples were collected across NSW in January to March 2025. The data has been provided to FSANZ to be used in the final report.

Food safety compliance

Food safety compliance activities include:

- conducting audits and inspections of food businesses
- investigating breaches in compliance to the Code
- investigating suspected foodborne illness
- investigating labelling complaints and compliance
- addressing issues identified by Food Safety Officers during audits
- targeted food business or sector projects to increase compliance.

These investigations can result in the analysis of food for a wide variety of tests. Enforcement action may be instigated for non-compliant samples. Between 1 July 2024 and 30 June 2025, a total of 1,418 samples were submitted to MNAQ and Symbio Laboratories (Table 3).

Table 3. Samples submitted for compliance investigations

Category	Number of samples
Samples taken during audits and inspections	8
Foodborne illness investigations	439
Complaints and compliance projects	971
Total	1,418

Samples taken during audits and inspections

Samples taken during audits usually consist of raw meat samples that have failed a field test for sulphur dioxide (SO₂). SO₂ is not permitted to be used in raw meat. If a field test is positive, a three-part sample is then taken and submitted to the primary testing provider laboratory for SO₂ analysis. Some of these samples can also be submitted for meat speciation to determine whether the meat species matches with what is on the label. Sausage samples are occasionally submitted for SO₂ analysis to ensure they comply with the maximum permitted level in the Food Standards Code of 500 mg/kg.

Between 1 July 2024 and 30 June 2025, 1,218 audits of licensed retail meat businesses were conducted. This year 8 samples of raw meat from 3 butchers were submitted for SO₂ testing because of a positive field test. All the samples were non-compliant, with SO₂ values ranging from 691 to 1,800 mg/kg.

Appropriate enforcement action has been taken for the non-compliant samples, including issuing 8 penalty infringement notices.

Foodborne illness investigations

The Food Authority investigates suspected cases of foodborne illness in partnership with NSW Ministry of Health, local councils, and interstate agencies. Between 1 July 2024 and 30 June 2025, a total of 439 food and environmental samples were submitted for testing in response to foodborne illness investigations and their follow up activities.

Complaints and compliance projects

Complaint samples usually result from either a member of the public contacting the Food Authority's helpline or from local councils. Samples may be acquired from the complainant or from retail outlets, manufacturers or importers. Common complaints include unlabelled allergens, allergen contamination or poor labelling. Compliance projects usually result from an incident, increase in unknown illnesses, an increase in a particular issue seen during audits or inspections or an overseas or interstate event.

Between 1 July 2024 and 30 June 2025, a total of 971 samples were submitted for testing due to a complaint or compliance project.

Complaint samples

Between 1 July 2024 and 30 June 2025, 77 samples were submitted for testing due to a complaint. This number is lower than the previous year (316 samples were submitted in 2023-2024 which was due to a large number of samples relating to one complaint). Fifty-seven samples were submitted for testing due to complaints regarding allergens, which is similar to the number of allergens' complaint samples submitted in 2023-2024 (52 samples).

Compliance projects

Between 1 July 2024 and 30 June 2025, 894 samples were submitted for testing due to a compliance project.

Salmonella Enteritidis mandatory testing

In August 2019, the Biosecurity (*Salmonella Enteritidis*) Control Order 2019 came into effect. The Control Order aimed to prevent, eliminate, minimise and manage the biosecurity risk posed or likely to be posed by the spread of *Salmonella Enteritidis* (SE) in NSW.

The Control Order was amended on 30 June 2020 to include a requirement for all licensed egg business in NSW to undertake mandatory SE testing from 1 July 2020. Sampling and testing are required every 12 to 15 weeks for the duration of the Control Order. This testing can occur within the National *Salmonella Enteritidis* Monitoring and Accreditation Program (NSEMAP), or at either EMAI or Birling Laboratories. The Food Authority funded the cost of laboratory testing conducted by EMAI and Birling Laboratories.

On 20 May 2025, the Biosecurity (SE) Control Order was amended and extended until 30 June 2026, and the Food Authority will continue to fund the testing cost until then.

From 1 July 2024 to 30 June 2025, a total of 276 samples were tested at EMAI and Birling Laboratories.

On 1 September 2025, the NSW Food Regulation 2025 came into effect, and it outlines the new requirement for licensed egg primary producers to undertake *Salmonella Enteritidis* environmental sampling of poultry sheds and poultry housing areas. As a result, the Biosecurity (*Salmonella Enteritidis*) Control Order 2024 was revoked on 1 September 2025 as its testing requirements are now included in the Food Regulation 2025. The Food Authority will continue to fund the testing cost of one pooled sample for each farm every 12-15 weeks when the testing is conducted at EMAI or Birling Laboratories.

More information

- Visit www.foodauthority.nsw.gov.au
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