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| Guide for Victorian manufacturers and importers |
| Semi-dried tomatoes |

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# Semi-dried tomatoes and Victorian regulations

In Victoria, food businesses are regulated by councils under the *Food Act 1984* (the Act) and must comply with the Australia New Zealand Food Standards Code (the Code). Manufacturers must be registered with their local council, have a food safety program that addresses hazards associated with food handling and also have a food safety supervisor. Importers are also covered by the Act.

It is an offence under the Act for a person to sell food that is unsafe or unsuitable for human consumption and Chapter 3 of the Code sets out obligations that apply to all food businesses, including businesses that handle semi-dried tomatoes (SDT). For information about the Code, go to: <http://www.foodstandards.gov.au/code>.

This guidance note has been prepared to assist businesses to meet a number of their key obligations by reinforcing the need to manage food safety throughout the production chain.

## On farm

When sourcing tomatoes to manufacture SDT, or when importing SDT, you should be satisfied that on farm operations used to grow the tomatoes have:

* good agriculture practices (GAP) in place to help minimise transmission of Hepatitis A (HAV). For example, food safety systems such as Freshcare™ or Global GAP may be useful
* clean irrigation and product wash water that is free of human waste
* fertilisers that do not contain human waste
  + accessible hand washing and clean and suitable toilet facilities for farm workers.

## Manufacturing

### You should ensure that:

* good manufacturing practices (GMP) and hazard analysis systems should be in operation to help minimise transmission of microorganisms
* you understand where, who and how the tomatoes and ingredients are sourced
* production and product wash waters are potable (safe for human consumption). The quality of water is important to prevent contamination
* all surfaces with which SDT (or product used to manufacture them) come into contact must be cleaned and sanitised to prevent cross contamination
* washing of produce and equipment is monitored to ensure appropriate levels are maintained, and contact times of sanitisers/disinfectants are used at all stages of production and manufacture
* cross contamination from other products or ingredients does not occur to prevent microbiological or chemical contamination
* traceability of all ingredients used in the manufacture of SDT can occur. Maintain traceability throughout production and manufacture. Ensure appropriate records are kept to show all of these stages
  + during the manufacturing of SDT in Australia and overseas, you are satisfied that the manufacturing facility has suitably recognised and accredited food safety systems.

**Importers of SDT should be assured that these steps are taken at manufacturing sites.**

## Specific reduction steps during the manufacture of SDT

There is no single specific treatment for HAV that has been shown to be effective in eliminating all HAV from semi-dried tomatoes. Therefore, prevention of product contamination is essential to minimise the transmission of the HAV.

Some treatments can be used to reduce the risk of HAV contamination in SDT manufacture, and contribute to the control of the risk of HAV in association with hygienic processes throughout on farm and production stages. Recommendations can change over time, as more becomes known about the presence of viruses in and on food, and the means of controlling risks. At this stage the following is suggested:

* + 1. Washing fresh whole tomatoes using the following process may reduce the level of contamination:
    - sanitiser containing 500-1000ppm peracetic acid for 10 minutes
      * washed in potable water for 20 minutes.
    1. Heat treatment of cut tomatoes using the following processes may reduce the level of contamination:
    - ≥ 60 °C or above for 14 hours, or
    - 75 °C for 11 hours, or
      * 85 °C for 2-3 hours followed by 55 °C for 5-6 hours.

These processes have shown a reduction in HAV levels during laboratory experiments, but none of these processes can be relied on to eliminate HAV completely. Manufacturing operations can be quite different to laboratory testing. If implemented, these processes must be verified in the manufacturing facility. If you import SDT, be satisfied that appropriate steps are in place at the manufacture site.

## Personal hygiene at all stages

Staff handling of product can occur at several points across the supply chain of SDT from harvest on farm through to the processing plant, and any packing sites. Therefore, personal hygiene is critical to prevent contamination.

### You should be satisfied that:

* workers are educated about personal hygiene and are limiting hand contact with food that is not subsequently cooked as a preventative measure
* practical advice and education about personal hygiene including techniques for effective hand washing is given to food handlers
  + staff have been educated about exclusion from duties if a person is unwell, and preventative measures that apply if they come into contact with persons with infectious diseases such as Hepatitis A, and that these measures are enforced.

## Record keeping and traceability

Standard 3.2.2 of the Code covers the requirements for traceability in a food business: that is, the ‘one step forward and one step back’ principles.

This means that **a food business is obliged to keep records**. The business must be able to provide information about what food it has on the premises and where it came from, and must be able to supply, when asked, the name of the food and the name of the vendor of that food to the business.

A food business engaged in the wholesale manufacture or importation must also have a written system in place to ensure the recall of unsafe food.

To be effective, it is recommended that the recall plan include records that cover:

* what products are manufactured or supplied
* the volume or quantity of products manufactured or supplied
* the batch or lot identification (or other markings)
* where products are distributed
  + any other relevant production records.

# Remember:

There is no specific treatment that has been shown to be effective in eliminating all HAV from semi-dried tomatoes.

It can be difficult to ascertain at which point food contamination with HAV takes place.

Preventative strategies at each stage of food production are the best way to reduce the risk of contamination and transmission.

Importers and manufacturers must ensure their food safety systems and good manufacturing practices are effective and implemented across the supply chain.

Further information on traceability can be found at the **FSANZ website** at: <http://www.foodstandards.gov.au/industry/safetystandards/traceability/Pages/default.aspx>

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