

# Responsibilities in relation to producing and handling ready-to-eat (RTE) meats in Queensland



The National Primary Production and Processing Standard for Meat (Standard 4.2.3) outlines the requirements in relation to the production of Ready-To-Eat (RTE) Meat (the National Standard).

The National Standard has been incorporated under the *Food Production (Safety) Regulation 2014* (the Regulation) and its provisions reflect the intent of the outcomes required by the Standard.

Accreditation holders who produce RTE meats must meet specific responsibilities under the *Food Production (Safety) Act 2000* and the Regulation.

## Definitions

### Meaning of RTE

RTE is defined under the Regulation to include:

- (a) smallgoods; and
- (b) slow-cured meat; and
- (c) UCFM.

### Meaning of Smallgoods

Under the *Food Production Safety (Act) 2000*, **smallgoods** means—

- (a) dried meat; or  
*example of dried meat—beef jerky*
- (b) uncooked and fermented minced meat products; or  
*example —salami*
- (c) cooked offal or minced meat products; or  
*examples—*
  - 1 chicken liver pâté
  - 2 luncheon sausage
- (d) cooked whole meat products; or  
*example— ham*
- (e) bacon.

**UCFM** means a comminuted fermented meat that 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, whether or not the meat has been heated.

## Risk classifications

All RTE activities, including UCFM, are classified as high risk, i.e. 'H'.

## Your responsibilities

You should not produce RTE meats unless you are accredited with Safe Food and are operating under an approved food safety program or management statement.

You must be able to demonstrate that your business processes produce safe smallgoods

You must also be able to demonstrate your business and product meet requirements of the relevant standards. A validated process is one that is carried out in accordance with the relevant national standards, or is confirmed by a scientifically proven study. Further guidance may be found in the Meat & Livestock Australia *Guidelines for the Safe Manufacture of Smallgoods*.

Results of validation should be part of your approved food safety program or management statement and must be made available for inspection by auditors as requested.

## Your food safety program or management statement

Throughout the year you will have to make sure that your food safety program (or management statement) remains consistent with your activities. Therefore, you should review your day-to-day business activities regularly to make sure activities carried out are consistent with your food safety program or management statement and reflect typical businesses processes.

Any major changes to your business might require approval from Safe Food, such as:

- change to your process
- change to your equipment
- changes to your activity
- changes to critical control points.

Making changes to your operations? Give us a call to see if you need to amend your food safety program or management statement. Free call 1800 300 815 or 07 3253 9800.

## Validating your business operations

As a food production or processing business operating in Queensland, you must be able to demonstrate that the processes you use will produce safe food that will comply with legal limits.

You should review and document your business and food production processes before commencing commercial operation.

You do not need to validate your processes if your business complies with the specific requirements stated in the national standard, AS 4696:2007. However, any variation from these requirements will require validation. You may be requested by Safe Food to validate your procedures as a condition of your accreditation, or as a result of an audit.

Results of any validation studies should be included in the food safety program or management statement. These should be submitted as part of any application for accreditation or amendment to the food safety program or management statement. RTE meats should not be produced or supplied unless the approved food safety program or management statement includes this activity.

The main activities in your business that are likely to require regular review and validation are:

- **cooking**  
time and temperature process used must be sufficient to kill pathogenic microorganisms present in raw meat
- **cooling**  
the process used to cool cooked product must be quick enough to prevent growth of pathogenic microorganisms. In particular, spore forming bacteria that could survive the cooking process and can grow in cooked product if it is cooled too slowly
- **any further processing**  
the processes from cooling to final packaging must not contaminate cooked, RTE product with micro-organisms.

Raw meat and RTE meat should be kept separate to avoid cross contamination. Staff undertaking the processes must have adequate skills and knowledge as demonstrated in the food safety program or management statement

- **use of food additives**

The *Australia New Zealand Food Standards Code* requires that you meet specific limits regarding the use of food additives.

You will need to validate that your cooking and cooling processes meet the time and temperature specifications required by the Regulation. You will need to use thermometers or temperature data loggers to produce cooking and cooling curves to demonstrate that your processes meet the requirements of the *Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption AS4696:2007*.

## Testing your product

To avoid the need for a food recall if pathogens are detected, all batches of tested product is required to be under 'test and hold' at the premises and not sold or supplied until laboratory results are known.

Validation can be demonstrated by testing representative product at each critical production point, or by testing representative final product.

Testing should be carried out for the relevant pathogens as specified in *Standard 1.6.1 – Microbiological Limits in Food*, and for food additive levels as specified in *Standard 1.3.1 – Food Additives* of the *Australia New Zealand Food Standards Code*, including, but not limited to:

- Salmonella species (an indication of inadequate cooking or cross-contamination)
- Campylobacter species related to poultry based smallgoods (an indication of inadequate cooking or cross-contamination)
- Clostridium perfringens (an indication of inadequate cooling processes)
- Pathogenic E coli (an indication of inadequate cooking or cross-contamination)
- Coagulase-positive Staphylococci (an indication of post-cooking contamination)
- Listeria species (an indication of post-cooking contamination)
- Food additives including Nitrites (potassium and sodium salts)/sulphites (Sulphur dioxide)/
- Sorbic Acid and Sodium, Potassium and Calcium sorbates.

A Listeria Management Guideline developed by the Australian Meat Regulators Group is available from Safe Food to help you meet your obligations in managing food safety hazards as outlined in National Standard.

The Guideline provides information regarding validation of processes and minimum management standards. Listeria is a major hazard in RTE meat production.

Please contact Safe Food for a copy of the Guideline, or access it through our website at [www.safefood.qld.gov.au](http://www.safefood.qld.gov.au) .

The notification protocol that must be followed by accreditation holders in circumstances where pathogen detection has occurred may also be accessed through the Safe Food website.

## Getting the samples right

Test results are only as good as the samples taken. Safe Food recommends that you contact a National Association of Testing Authorities (NATA) approved laboratory about your sampling and testing intentions, and the reasons for testing – before sampling. Laboratories approved by NATA must be used for your validation purposes.

Samples should be representative of the commercial product and should preferably reflect the 'worst case' situation (i.e. full range of critical limits) in relation to each businesses process.

Samples should reflect the following critical limits:

- lowest cooking temperature in the 'coldest' part of the cooking appliance
- shortest possible cooking time for the largest portion of meat
- longest cooling time
- typical post-cooking processes (e.g. sliced product if this is commercially supplied).

For validation purposes, a minimum of five samples from a batch should be taken, and sliced and packaged according to normal commercial practice (i.e. how it is sold to the consumer).

The samples should then be provided to the laboratory in accordance with instructions from the laboratory.

## Product distribution after testing

All batches tested must be held and not distributed until test results are known.

This is because NATA laboratories in Queensland are required to report the detection of certain pathogens to Queensland Health. These notifications can result in a recall of product found to contain prescribed pathogens.

If pathogens are detected, it is a relatively straightforward process to identify, isolate, rework or dispose of affected batches. However, it is a costly and complex procedure to recall implicated batches that have been distributed to the public.

## Sample compositing

In some cases it is possible to combine samples – producing 'composite' samples for analysis. This can reduce testing costs. If results are positive for pathogens then additional sampling and testing may be required to identify the non-complying components of the composite sample.

You should investigate costs and benefits of composite sampling with your chosen NATA laboratory.

## Verification

Verification is carried out to demonstrate that the validated processes achieve the critical limits documented in the food safety program or management statement.

Verification should occur:

- before supplying your product commercially
- whenever changes are made to your business processes
- on a regular basis after initial verification to confirm that procedures are operating appropriately (including whenever your food safety program or management statement is reviewed).

## Additional information

The Safe Food website is useful for various Standards, Protocols and Fact Sheets and can be accessed at [www.safefood.qld.gov.au](http://www.safefood.qld.gov.au). There is a library section with links to these publications under the Meat & Meat Products page of the website.

The 'Australian Standard for the Hygienic Production and Transportation of Meat and Meat Products for Human Consumption': <http://www.publish.csiro.au/nid/18/pid/3150.htm>

Details of laboratories approved by the National Association of Testing Authorities (NATA): <http://www.nata.asn.au>

Information for the food industry from Queensland Health: [http://www.health.qld.gov.au/industry/food\\_industry.asp](http://www.health.qld.gov.au/industry/food_industry.asp)

The publication *Safe Food Australia*: <http://www.foodstandards.gov.au/newsroom/publications/safefoodaustralia2nd519>

FSANZ food safety fact sheets: [www.foodstandards.gov.au](http://www.foodstandards.gov.au)

### **More information:**

Safe Food Production Queensland (Safe Food)  
PO Box 549  
Stones Corner Queensland 4120  
Telephone: 07 3253 9800  
Free call: 1800 300 815  
[info@safefood.qld.gov.au](mailto:info@safefood.qld.gov.au)  
[www.safefood.qld.gov.au](http://www.safefood.qld.gov.au)