CONSUMER GOODS COUNCIL OF SOUTH AFRICA

FOOD SAFETY INITIATIVE

LISTERIOSIS OUTBREAK STATUS REPORT

08 May 2018

BACKGROUND

On the 4th March 2018, Dr. Aaron Motsoaledi, announced the source of the outbreak and the National Consumer Commission (NCC) gave an order to recall processed meat products manufactured by Enterprise (a division of Tiger Brands) and Rainbow (a division of RCL Foods) following confirmation of laboratory tests by the National Institute for Communicable Diseases (NICD). As of December 2017, the Consumer Goods Council of South Africa (CGCSA) has been assisting with the gathering of information since the Minister of Health, Dr. Aaron Motsoaledi, notified the nation of the outbreak of Listeriosis, a food borne disease in South Africa. So far, regrettably, a total of 201 deaths have been reported.

MEDIA REPORT ON LISTERIOSIS OUTBREAK AS OF 4TH MARCH 2018

After the Minister’s announcement, the CGCSA prepared a response which was disseminated to the media, and posted on the CGCSA website. In addition, it was distributed to relevant CGCSA stakeholders. Predictably and inevitably, media interest in the issue was high, and still is. The CGCSA, as an interested party, received numerous requests from the media for interviews and further comment. It was decided that subject expert, Ms. Matlou Setati, would be the spokesperson for the CGCSA. In all, 11 media engagements have been held as at 10am, 4th March 2018, which have included 8 radio and 3 television broadcasts.

The summary of the media engagements is as follows:

   - SABC “Morning Live” (7am) [https://youtu.be/78AMVajwRlg](https://youtu.be/78AMVajwRlg)
   - eNCA (9.30am) [https://www.facebook.com/eNCAnews/videos/1200096330127030/?ref=tahoe](https://www.facebook.com/eNCAnews/videos/1200096330127030/?ref=tahoe)

INDUSRTY INVOLVEMENT

The CGCSA commends industry for their assistance since December 2017, where test results were shared with the NICD and Food Control of the Department of Health. The NICD has further requested point of sale data from retailers to assist in the finalization of the research. The data will be solely used for research purposes and to monitor the decline of the outbreak and the recall
efficiency. The CGCSA urges members (retailers & affected production companies) to provide data to assist the NICD.

CGCSA WAY FORWARD

1. Food Safety Training

The CGCSA, in partnership with KVRQgubheka, will be running a 2-day workshop on how to safely handle food & beverage products in the food manufacturing, production distribution and retail environments. The programme will provide delegates & companies with the ability to, amongst other topics:

- Handle, store & manage food & beverage products safely & appropriately
- Understand & prevent contamination of food & beverages products etc.

The purpose of this training is to reemphasise the importance basic food hygiene in food handling for employees.

Training will be held on:

Date: 5 – 6 June 2018
Venue: CGCSA Office
Cost: R5000.00 per person

For any queries email info@cgcsa.co.za.

2. CGCSA Government Engagements

On the 30th March 2018, The CGCSA-FSI had a meeting with the NICD and the work demarcations between the NICD (clinical surveillance & outbreak response) and the NHLS (food sampling and testing: enforcement surveillance) were outlined to clarify engagements going forward.

Following the NICD meeting and discussions at the Joint Parliamentary meeting for Health on the 28th March 2018, the FSI will be engaging with the Food Control of the Department of Health and the Department of Agriculture, Forestry and Fisheries (DAFF) to facilitate industry & government discussions around:

- Conclusion of the outbreak investigation
- Communication pertaining to affected industry to restore consumer confidence in the sector and products
- General processed meat sector facilities evaluation/inspection process to continue with business (as per parliamentary DAFF Minister comment)
- Hygiene and microbiological regulations and limits
- Food products surveillance testing and inspection
- Sampling methods
- Environmental pathogen limits and what a positive result means for a facility
- South African food history data-monitoring for rise in pathogen infections (fingerprinting and genome sequencing)
• Government Private Consumer education on Listeria and the various strains involved. (What a positive Listeria test means and basic consumers education on the subject)
• A meeting with the DTI has been secured for the 4th June 2018 in that regard.

3. Food Safety Workshop

Date: 8 May 2018
Attendance: Government, NICD, Industry, SMME's

As Planned, the CGCSA-FSI hosted an industry workshop to discuss issues regarding general food safety with Listeria as a key pathogen of discussion.

The status as per NICD situational Report dated 7 May 2018, states that there has been a decrease in listeriosis cases diagnosed each week since the product recall, with three additional cases reported since the last situation report. In total, 1 027 cases have been reported from 01 January 2017 to 02 May 2018, with 58 cases reported for the 8-week period since 5 March 2018. During the eight weeks prior to 5 March 2018, 200 cases of listeria were reported.

Government has established a multi-sectoral incident management team (IMT) that was formed under the leadership of the National Department of Health and has finalized the implementation of the updated Listeriosis Emergency Response Plan. The plan was developed by the IMT and approved by the DG, National Department of Health (NDoH) on 20 April 2018. The aim of the plan is to control and end the current listeriosis outbreak, and to strengthen systems to facilitate prevention and early detection of outbreaks. To inform and support these aims, surveillance and investigation of cases of listeriosis and risk communication activities are ongoing.

Additional activities to complement these are being conducted as follows:
• Phase 1: Development of the ERP, communication of the plan with provincial and district stakeholders, development of material and training of staff to support inspections of facilities identified as at-risk food processing plants;
• Phase 2: Inspection of at-risk food processing plant and strengthening the capacity of district environmental health practitioners;
• Phase 3: Reporting and consolidation of health system strengthening activities, and after-action review.

Progress of the Emergency Response Plan:
• Phase 2 of the listeriosis emergency response plan (ERP) to strengthen the response to the listeriosis outbreak has commenced. Factory inspections of Tiger Brands (Hercules and Germiston) and RCL (Wolwehoek) factories were conducted by the Incident Management Team (IMT) including WHO food safety experts.
• Data is being collected from district municipalities to support prioritization of food production facilities for inspection (Source: NICD)
In view of the above, the CGCSA-FSI held an industry workshop to discuss food safety and Listeriosis, in particular.

**Key discussions included:**

1. Identification of high risk food products in addition to the codex and globally identified for Listeria, South Africa context.
2. Frequency of testing during production and release requirements of high risk products.
3. Standards for Listeria for a variety of products: needed urgently. Accept international standards e.g. EU or need for SA to do risk assessment? Time considerations, if we are not to adopt the international standards with focus on production release micro limits vs shelf life limits?
4. Accreditation of methods and laboratories (private & public labs), necessity or not in view of conflicting test results found during inspections recently.
5. Sharing of isolates with the NICD for South African Micro databank, for outbreak monitoring and swift identification of source.
6. Mandatory Food safety requirement for high risk products (HACCP), need or not?
7. Need for Government risk communication plan to be shared with the public.
8. Provincial involvement in food control and how does industry and public best liaise with the many provincial and municipal inspectorates (will there be uniform guidelines shared with all government stakeholders on food safety instead of different protocols from different municipalities & provinces), Health Act is the main Act enforced by EHP’s?
9. Application & mandatory advocacy for GS1 standards to assist in terms of traceability, data capture and for swift and orderly product recalls e.g. recall of batch vs full recall etc.)
10. Food Safety discussions at high level such as at NEDLAC level (Labor, government departments affected, industry and community involved). Is the need for a single food agency or parallel inspections from government?
11. Enforcement by EHP vs NRCS? Quality remains a DAFF mandate unless mandate assigned to one of the government agencies which is a possibility for industry to prepare for.
12. Product recall protocol: What to do and who to contact when faced with a product recall

**Report from the Workshop:**

1. It was resolved that there is a need for a National Food Safety Strategy that will outline public objectives regarding food safety in the country. This national strategy should outline who the key stakeholders are along with their roles and responsibilities. Further, the strategy should address the following:
   - High profile food borne pathogens and related high-risk food microbiological limits legislation needed as a matter of urgency from the national Department of Health, in addition to the Hazard Analysis & Critical Control Points (HACCP) and Hygiene regulations
   - Protocol for Sampling and analysis for the listed pathogens - this protocol should include requirements for laboratories and methods of analysis;
   - Protocol for sharing of isolates and communication with stakeholders and the public when positive results of food borne pathogens are identified in the field, to build a national food history data bank;
   - Communication when an outbreak is identified and outbreak response Team is convened; and
   - A protocol for product recall will be developed by the CGCSA.
The meeting discussed issues relating to global standards on food safety and found the EU standards Commission Regulation (EC) No 2073/2005 well aligned with South African Industry current practice and were widely accepted (see below table). The CGCSA and industry are to make recommendations of the EU standards to be adopted as South African microbiological standards. The EU regulations are already aligned to Codex Alimentarius and scientifically supported by European Food Safety Authority (EFSA). The application of absence of Listeria monocytogenes in raw meat as currently applied by Environmental Health Practitioners is not acceptable as scientifically it is not aligned internationally and consideration to the intended use and inherent nature of the product is important.

<table>
<thead>
<tr>
<th>Food Category</th>
<th>Limits</th>
<th>Stage where the criterion applies</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Ready-to-eat foods intended for infants and ready-to-eat foods for special medical purposes</td>
<td>Absence in 25 g</td>
<td>Products placed on the market during their shelf-life</td>
</tr>
<tr>
<td>1.2 Ready-to-eat foods able to support the growth of L. monocytogenes, other than those intended for infants and for special medical purposes</td>
<td>100 cfu/g</td>
<td>Products placed on the market during their shelf-life</td>
</tr>
<tr>
<td></td>
<td>Absence in 25 g</td>
<td>Before the food has left the immediate control of the food business operator, who has produced it</td>
</tr>
<tr>
<td>1.3 Ready-to-eat foods unable to support the growth of L. monocytogenes, other than those intended for infants and for special medical purposes</td>
<td>100 cfu/g</td>
<td>Products placed on the market during their shelf-life</td>
</tr>
</tbody>
</table>

The NICD/IMT has a meeting planned for the 18th May 2018 to discuss the NRCS development and publication on SANS 885 as a compulsory standard, meaning they will be doing inspection on a levy basis. The DoH is in the process of reviewing microbiological standards for various food products to further assist in the food safety compliance which would possibly be with the NRCS in terms of processed meat products.

Industry recognises that there is an urgent need for microbiological standards, updated hygiene regulations and updated HACCP regulations which include preventative actions, such as Good Hygiene and Manufacturing Practices (GHP, GMP) and the Hazard Analysis Critical Control Point (HACCP) principles which contribute extremely to achieving food safety, current legislation does not include such practices.
Kind Regards,
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