

New Zealand Food Safety Science and Research Centre

Guidance for managing sensitive results obtained in research projects

Background

NZFSSRC conducts high quality science to support New Zealand's food and beverage sector in their goal to produce, process and sell food that is safe to eat. It is a key objective of the Centre to work with New Zealand's food industry to help reduce the risk and impact of adverse food safety events and to safeguard the health of all domestic and international consumers of New Zealand products. The NZFSSRC is a partnership between food industries including the red meat, poultry, dairy, seafood and horticulture sectors, the Ministry for Primary Industries, and seven research organisations namely, AgResearch, Massey University, Cawthron Institute, University of Otago, The Institute of Environmental Science and Research, Plant and Food Research and the University of Auckland.

The type of research performed by the NZFSSRC and its partners is varied, and includes applied research focused on (a) preventing the microbial contamination of foods with bacteria such as *Listeria*, *Campylobacter*, *Salmonella* and *Yersinia* – including the use of molecular methods to identify strains, source tracking, and decontamination trials, (b) chemical contaminants, (c) evaluating the risk of various hazards in foods, including testing to understand their occurrence and prevalence and to understand the impact of various risk mitigation steps, and (d) consumer insights and risk communication research.

As part of the Centre's research activities, from time to time testing is conducted for hazards that have microbiological or chemical limits detailed in legislation or guidelines. Various microbiological and chemical limits are contained in the Animal Products legislation, the Australia New Zealand Food Standards Code, and the Ministry for Primary Industries food legislation and regulations. It is possible that periodically as part of the Centre's research projects that there will be detections of hazards at levels that exceed microbiological or chemical limits, or which have implications for public health or market access. It is critical that both the industry, the regulators and the researchers have a clear understanding of the consequences of such an event and the actions that will be undertaken by each partner if it occurs.

The goal of the following principles is to ensure that industry, regulatory and research partners act cohesively and respectfully together and are able to work together positively to minimise public health and market access impact if a 'sensitive outcome' ¹occurs through a Centre project. They are intended to give confidence to stakeholders that results generated through NZFSSRC research will be handled in an appropriate manner. The principles are **not** intended to restrict food safety research.

Principle One:

When designing projects, research and industry partners will carefully consider the risks of the project, including the likelihood of generating a 'sensitive outcome' through the course of the project.

Principle Two:

If a sensitive outcome is considered possible, a response plan will be developed as part of the project brief and address the following questions:

- Why is the research needed?
- What samples are required?
- What findings are possible?
- How can the impact of a potentially sensitive outcome be minimized?
- What could be the impact of the findings²?

¹ A 'sensitive outcome' could include the following issues: detection of a microbiological or chemical hazard at a level exceeding that specified in legislation, detection of a new species or virulent strain of bacteria, discovery of a new toxin or toxin analogue, identification of a substance regulated by an overseas country, identifying a potential linkage between the presence of a hazard in a food and current or historical human illness, etc.

² Note that consideration should be given to potential implications for market access/international trade.

- How will the findings be managed?
- Who can share the findings and with whom?
- Is data security addressed?

Principle Three:

Triggers for engaging with regulatory authorities will be defined in the response plan.

If a potentially sensitive outcome occurs in foods intended for consumption or in the primary production or processing environment, the industry is expected to notify their verifier and MPI, and take appropriate actions to protect consumers and prevent reoccurrence, as mandated in their food control plan, risk management plan, or national programmes. The triggers for when a notification to MPI must occur will be documented in the response plan.

Principle Four:

Actions taken when a 'sensitive outcome' is generated through a research project will be clearly documented in the response plan. This may include the following points:

- Researchers will verify results, and if appropriate re-test samples and/or commission an external laboratory to re-test.
- Researchers will promptly inform the industry partner and the Director of the NZFSSRC of the test result.
- In the case that regulatory disclosure is required by industry, the industry partner will provide written assurance to the NZFSSRC that notification to MPI has occurred.
- Industry will review the relevant legislation and follow the procedures in their food control plan, risk management programme, or national programmes (for example, locate affected product, hold product, recall product, take corrective actions to prevent recurrence).

The NZFSSRC research partners and industry members agree to these principles and they will be captured in each individual project plan.