

Upcoming EU legislation change for *Listeria* *monocytogenes*

What it means for **your business**

From 1 July 2026, EU Regulation 2024/2895 introduces a change to the criterion for *Listeria monocytogenes* in many ready-to-eat (RTE) foods*. This legislation is an amendment to Regulation (EC) 2073/2005 and is being implemented to improve consumer safety across Europe.



What is changing?

For many RTE foods, it is not possible to guarantee an absolute absence of *Listeria monocytogenes* at any level, however low. Through managing good hygiene, food businesses can produce testing results routinely showing *Listeria monocytogenes* not detected in 25g of product while under their control, even though there may be undetected presence at very low levels from time to time.

Under the new EU rules, these RTE foods that support the growth of *Listeria monocytogenes* must either:

- ✓ Meet the legal microbiological criterion of not detected in 25g, which will apply for the entire shelf-life of the product, not just while it is under the control of the manufacturer as it did previously
- ✓ Demonstrate that levels will not exceed 100 cfu/g throughout shelf-life.

Where absence of *Listeria monocytogenes* cannot be guaranteed, and as conditions outside of the manufacturer's control including temperature abuse could make detection more likely, the change raises concerns.

Some food manufacturers now wish for the first time to build evidence of compliance with the 100 cfu/g criterion.

How does this affect UK businesses?

Although this regulation has not been adopted into GB law, it will apply to all food products placed on the EU or Northern Ireland markets. If your products are exported or distributed across Europe, food businesses will need to demonstrate compliance.

What foods are most affected?

Products most likely to be affected include RTE foods that are raw or have post-cook handling and are exposed to the environment before packaging. These include:

- ✓ Cold-smoked fish (e.g. smoked salmon)
- ✓ Soft cheeses
- ✓ Cooked sliced meats
- ✓ Salads, sandwiches, and pâté
- ✓ Fresh cream cakes

How Eurofins can help

Eurofins Food Testing UK Ltd. offer a wide range of testing and consultancy services to support your compliance with EU 2024/2895.

Routine and investigative testing

- ✓ Finished product testing, including end-of-life testing
- ✓ Environmental monitoring; swab testing and sampling strategies
- ✓ Shelf-life verification, including testing to and beyond product expiry
- ✓ Physicochemical analysis; pH, water activity (Aw), salt content

Specialist studies and support

- ✓ Challenge testing for *Listeria monocytogenes*
- ✓ Predictive modelling to simulate microbial growth over shelf-life
- ✓ Microbiological risk assessments, including setting specification criterion
- ✓ Interpretation of results and trends across testing data
- ✓ Consultancy support on hygiene practices, sampling plans and HACCP
- ✓ Tailored training for internal technical and QA teams

FAQs

Q: Does this regulation apply to all food businesses in the UK?

A: Only businesses supplying food to the EU or Northern Ireland must comply. However, many UK producers are voluntarily adopting these standards to protect exports and enhance product safety.

Q: What if I can't meet the not detected in 25g* limit throughout shelf-life?

A: If you can't meet the criterion throughout shelf life, then you must provide evidence that

Listeria monocytogenes levels remain under 100 cfu/g* for the full shelf-life.

Q: What's the best approach to demonstrate compliance?

A: A combined approach: Good quality ingredients, good hygiene practices and effective management of controls, comprehensive environmental monitoring, predictive modelling, and end-of-life testing. In some cases, challenge testing is appropriate.

Q: Can Eurofins Food Testing UK help us design a testing programme or sampling plan?

A: Absolutely. Our microbiology consultants can help you develop a fit-for-purpose monitoring plan, train your team, and advise on interpretation and corrective actions.

Q: Will this regulation also be introduced into GB law?

A: As of now, no decision has been made. However, divergence in standards could impact cross-border trade, so forward-thinking businesses are preparing in advance.

Next steps

If you produce or handle RTE foods for the EU or NI markets, now is the time to act. We recommend:

- ✓ Reviewing your hygiene and environmental monitoring protocols
- ✓ Assessing your current shelf-life data and microbiological testing strategy
- ✓ Discussing challenge testing and predictive modelling with our team

* Note: Applies to RTE foods able to support the growth of *Listeria monocytogenes*, other than those intended for infants and for special medical purposes

This document reflects our understanding of EU Regulation 2024/2895 as of July 2025. While prepared with care, Eurofins Food Testing accepts no liability for errors or legislative changes.