

2026



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10 YEARS OF UNCOMPROMISING
COMMITMENT TO PRODUCT
FOOD SAFETY



Annual food-safety update



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This year marks ten years since Milarex was established. Over that decade, our business has been built on one basic principle: product integrity comes first. That means delivering products that are consistent, reliable, and true to specification, every day, across raw materials, processing, and final product. Food safety sits at the centre of that commitment. It is not a separate workstream or a communications theme, but a core part of product integrity and of the trust our customers place in us.

True to this commitment, we are transparent about our food safety testing results. In this update we describe our thinking and practise, and share our food safety test results from 2025.

Food safety is a basic requirement in ready-to-eat seafood. It is also a matter of trust. Most of our salmon products are consumed without further heat treatment. That means we must work on the assumption that control has to be built into the product, the process, the factory environment, and the supply chain. For *Listeria monocytogenes* in particular, it requires discipline, testing, validation, and fast corrective action when deviations occur.

From 1 July 2026, the regulatory framework for ready-to-eat foods in the EU becomes stricter. For products that support the growth of *Listeria monocytogenes*, food business operators must either demonstrate that the product will remain within the applicable limit throughout shelf life or ensure that *Listeria monocytogenes* is not detected in 25 g during the relevant period. This raises the evidential burden on producers and increases the importance of robust validation, environmental control, and supplier management.

At Milarex, we regard this not as a communications issue, but as an operational one. The question is straightforward: can we document that our products, our processes, and our controls are fit for purpose under the tighter regime? Our food-safety work is organised around that question.

Listeria control, validation, and compliance with legal requirements for the 2026 regulatory regime

Milarex approach

Milarex works with a preventive control model built around raw materials, process control, factory environment, finished products, and rapid intervention.

All incoming raw material batches are subject to pathogen screening in line with our food-safety procedures. Findings are followed up with suppliers in accordance with Milarex specifications and delivery rules. In parallel, our production environment is monitored systematically in order to identify high-risk areas, detect potential harbourage points, and verify that sanitation and zoning controls are working as intended. Finished products are tested in accordance with our control regime, and products are not released unless they meet the applicable food-safety requirements.

Where a positive finding occurs, the product is blocked from distribution and the case is investigated. Depending on the circumstances, the outcome may include rework for alternative use, destruction, intensified cleaning, equipment review, additional sampling, supplier dialogue, or other corrective measures. The objective is not only to manage the individual case, but to identify the cause and implement effective corrective actions which reduce the risk of recurrence.

This is supported by in-house laboratory capability, established hygiene procedures, daily monitoring routines, and a hold-and-release discipline designed to prevent unsafe products from reaching the market.

What the 2026 regime means in practice

The regulatory change is important because it shifts the focus from general statements about food safety to documented control over time. It is no longer enough to test finished product at one point and rely on historic practice. Producers must understand product characteristics, processing conditions, storage conditions, and the potential for growth during shelf life.

In practice, this means more emphasis on:

- Product-specific validation.
- Shelf-life assessment.
- Challenge and durability testing where relevant.
- Stronger environmental monitoring.
- Clear decision rules for release, rework, or destruction.
- Closer follow-up of raw material performance.
- Documented corrective actions where findings indicate elevated risk.

For customers, this should provide greater assurance. For producers, it requires more work, more discipline, and better documentation.

Why environmental monitoring matters

Environmental monitoring is a central part of Listeria control in ready-to-eat production.

Listeria monocytogenes is persistent, resilient, and capable of surviving in food-processing environments if control is weak or inconsistent. It can grow at refrigeration temperatures and therefore requires a preventive approach throughout production, storage, and shelf life. That is why environmental monitoring is not a side activity. It is one of the main ways a producer verifies whether hygiene barriers, zoning, sanitation, and equipment controls are functioning as intended.

Environmental findings do not automatically imply finished-product contamination, but they do require attention, interpretation, and action. A mature food-safety system is not defined by slogans. It is defined by whether findings are detected early, investigated properly, and converted into operational improvement.

Validation and evidence

A stronger regulatory regime requires stronger evidence. For that reason, Milarex's 2026 food-safety work is centred on validation and verification. This includes continued work on shelf-life assessment, product-specific review of factors relevant to Listeria monocytogenes growth, and the use of challenge and durability testing where needed to demonstrate compliance. It also includes continued evaluation of supplier performance and ongoing refinement of environmental controls, sanitation, and process design.

The purpose is practical. We need to know, and be able to document, whether a given product category can support growth, what assumptions are valid, which controls are critical, and how these controls perform in normal production. Customers should expect documented reasoning, not broad assurances.

What customers should expect from Milarex

Customers should expect four things from us.

First, transparency about our control framework and the way we interpret results.

Second, continued investment in validation, monitoring, and preventive measures rather than reliance on end-product testing alone.

Third, clear decision-making when deviations occur, including blocking, investigation, corrective action, and follow-up.

Fourth, a food-safety dialogue grounded in evidence. In a stricter regulatory environment, documentation and operational discipline matter more than ever. Our objective is to provide customers with confidence that our products are produced under a control system designed for ready-to-eat risk, not adapted to it after the fact.



Our 2025 Listeria test results

Milarex reports its Listeria test results openly because food safety depends on trust, documented control and continuous improvement. Transparent reporting gives customers a clearer basis for assessing performance and shows how findings are identified, managed and followed up in practice.

Listeria results for incoming raw materials

All raw material batches arriving at our production facility undergo rigorous pathogen testing, with listeria as the primary focus for salmon. Our standard is zero listeria on incoming deliveries, regardless of species, origin, or packing station. However, the results indicate that this expectation is not met and has been moving in the wrong direction, reinforcing the need for strict testing protocols to minimize risks.

Listeria monocytogenes – Raw material										
Species	Origin	2023			2024			2025		
		Samples	positive	% positive	Samples	positive	% positive	Samples	positive	% positive
Salmon	Norwegian	1440	43	3,0%	1795	64	3,6%	1668	64	3,8%
	Scottish	64	5	7,8%	81	10	12,3%	74	9	12,2%
	Icelandic	132	13	9,8%	113	5	4,4%	259	18	6,9%
	TOTAL	1807	65	3,6%	2153	88	4,0%	2069	94	4,5%
Trout	Norwegian	89	3	3,4%	25	0	0,0%	84	1	1,2%
	Polish	17	13	76,5%	49	14	28,6%	59	10	16,9%
	Scottish	62	1	1,6%	61	1	1,6%	-	-	-
	Finnish	3	0	0,0%	1	0	0,0%	-	-	-
	Swedish	-	-	-	6	1	16,7%	1	0	0,0%
	Spanish	-	-	-	6	1	16,7%	28	3	10,7%
	French	-	-	-	3	0	0,0%	-	-	-
	Turkish	-	-	-	6	0	0,0%	1	0	0,0%
	Italian	-	-	-	-	-	-	3	0	0,0%
Bulgarian	-	-	-	5	0	0,0%	9	0	0,0%	
TOTAL	178	20	11,0%	199	18	9,0%	262	16	6,1%	
Sockeye	TOTAL	234	29	12,4%	195	20	10,3%	152	3	2,0%
All species		2219	114	5,1%	2547	126	4,9%	2483	113	4,5%

The percentage results based on Milarex internal testing data refer to routine testing before corrective action. Analyses are performed according to testing schedules approved by local veterinary authorities and based on manufacturer-validated testing methods or PN ISO standards.

At Milarex, food safety begins with our raw materials, and our ongoing monitoring of listeria levels play a crucial role in ensuring the highest standards. The latest testing data from 2023 to 2025 highlights some important trends in Listeria prevalence across different species and origins.

Overall Trends (All species)

- 2023: 5,1% positive cases (114 out of 2219 samples)
- 2024: 4,9% positive cases (126 out of 2547 samples)
- 2025: 4,5% positive cases (113 out of 2483 samples)

The overall Listeria rate is declining year by year, indicating a steady improvement in this area. However, the level of Listeria in raw salmon increased by 0.9% from 2023 to 2025, which is disappointing and underscores the need for further improvements.

All findings of Listeria are addressed with the supplier in accordance with Milarex food safety specifications and an established set of delivery rules.

Listeria results for environmental monitoring

Occasionally, listeria is detected in our production environment. Our extensive experience allows us to identify high-risk zones and equipment, while our specially designed Milarex facility minimizes the risk of pathogen spread.

Listeria Results for environment monitoring (according to monthly schedules)	2023	2024	2025
	% positive	% positive	% positive
„low risk area - BEFORE PRODUCTION“	0,4%	2,8%	0,9%
„low risk area - DURING PRODUCTION“	2,6%	6,2%	4,8%
high care/ high risk area - BEFORE PRODUCTION	1,6%	0,7%	0,8%
high care/ high risk area - DURING PRODUCTION	3,0%	2,8%	2,1%
TOTAL	2,6%	3,2%	2,5%

Our 2025 environmental screening showed better results in Listeria tests compared to 2024, primarily in isolated areas of our production facility. With our zero-listeria mindset, we are committed to continuous improvement. At Milarex, we proactively assess and enhance our processes and facility design, implementing preventive measures wherever risks or improvement opportunities arise. All our testing follows the highest industry standards, including HACCP, GMP, and relevant ISO certifications, ensuring uncompromising food safety for our consumers.

Listeria results for finished products

Producing and supplying ready-to-eat (RTE) products for global retail markets carries a significant responsibility. Ensuring the highest food safety standards is essential, as these products are often consumed directly from the pack, without further preparation. This requires strict quality control, rigorous testing, and continuous improvements to uphold consumer trust and safety.

Listeria results for finished product at the beginning of shelf life test RTE		Total Samples	Positive	% positive
2023	Sum Atlantic, Sockeye, Trout	66403	172	0,2%
2024	Sum Atlantic, Sockeye, Trout	62867	451	0,7%
2025	Sum Atlantic, Sockeye, Trout	59192	413	0,7%

2025 Listeria Testing Results showed a stable rate in ready-to-eat finished products compared to 2024 data. While we are dedicated to further reducing this number, we also recognize that an absence of Listeria findings over an entire year would indicate ineffective testing rather than a truly Listeria-free environment.

Consumers assume their food is safe to eat. That's why Milarex goes beyond the basics – protecting people's health is not just regulations. It is our duty.

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