

9 January 2014

Food Standards Australia New Zealand (FSANZ)

submissions@foodstandards.gov.au

Dear Sir/Madam,

Submission to FSANZ Proposal P1022: Primary Production and Processing Requirements for Raw Milk Products

Fonterra welcomes the opportunity to provide comments on the FSANZ P1022: Primary Production and Processing Requirements for Raw Milk Products, noting that Fonterra is a member of the FSANZ Standards Development Committee and has had the opportunity to provide comments during the development of the Proposal. Please also note that Fonterra supports the Dairy Australia submission.

Fonterra supports Option 1 of the FSANZ proposal. The dairy industry's excellent reputation as a producer of safe, quality dairy products is of paramount importance. Fonterra is of the opinion that the approach in Option 1 will protect whilst still enabling some raw milk products to be produced.

Fonterra has been supportive of the category approach since it allows regulation of different raw milk products to be considered proportionate to their risk. Fonterra comments are as below - .

1. *Further consideration of the exemption in Standard 4.2.4 for raw drinking milk that allows States and Territory laws to provide for the sale of unpasteurised milk.*

We note that FSANZ has decided not to assess the exemption at this stage and therefore allow States and Territory law to either allow or disallow the sale of unpasteurised milk. The dairy industry is a national industry and we believe it is important to have consistent national outcomes. FSANZ's risk assessment has concluded to date that raw drinking milk poses too great a threat to allow its sale. We believe that FSANZ should reassess this exemption and promote nationally consistent requirements – especially in view of the comment made in the FSANZ Call for Submissions document, page 5 “The severity of illness that results from EHEC infection is a significant contributor to the high level of risk associated with category 3 products, in particular raw drinking milk” Fonterra believes that raw drinking milk does pose very significant risks to public health – especially if not handled appropriately. Most food illness relating to dairy products are associated with raw drinking milk or category 3 type products. We would like to see this risk consistently managed across Australia, with raw drinking milk not allowed to be sold for consumption.

2. *We note the Supporting documents and believe they are appropriate.* The Guide for the primary production of milk for raw milk products is supported. The recognition of the importance of carrier status regarding animal health is vital – and we look forward to seeing the section foreshadowed to be developed to cover an appropriate herd monitoring program to confirm carrier status, specifically for EHEC/STEC. However, this may need to include some microbiological criteria. We also question the status of the recommended monitoring criteria in the Guide –these criteria are critical to ensuring safe raw milk product production and wonder if only having them in the Guide as recommended criteria is sufficient.
3. *Imported products* – we note that FSANZ has advised it “will work closely with the Department of Agriculture to inform the risk management approach to be applied to imported products “ and that this approach will be outlined in the 2nd call for submissions report. We believe that imported products must comply with the same requirements as domestically produced products and will be looking to ensure there is a robust system in place to verify this. All the risk assessment and management work for raw milk products and the category approach will be negated if imported products are not verified as meeting equivalent management criteria. The past

arrangements of only using a testing regime of a sample of imported products against microbiological criteria will not be satisfactory for Category 2 products under the proposed standard. Evidence of the whole chain management system will also be required.

4. *Imported products coming to Australia via New Zealand* under the Trans Tasman Mutual Recognition Agreement (TTMRA) are addressed through the agreement on Risk Foods which includes raw milk cheeses except where the milk or dairy products used to manufacture the cheese were processed, in making the cheese, in accordance with the requirements of Australia's Imported Food Control Order 2001.

Fonterra looks forward to continuing to work with FSANZ in finalising a standard for Category 2 products with appropriate and effective control measures to ensure the overall food safety reputation of the dairy industry is maintained.

With regard to Category 3 products, we agree with FSANZ's assessment that the production and sale of these products (including raw drinking milk) would present an unacceptably high risk for public health, and as such would put at risk the reputation of the industry for producing safe, quality products.

Being a natural product, raw milk is susceptible to contamination with bacterial pathogens, but is kept and made safe by a combination of modern on-farm hygiene and milk handling and storage practices and pasteurisation.

.Due to the increasing interest in 'natural' foods and minimal processing, alternatives to traditional pasteurisation continue to be examined. None the less any change to the traditional pasteurisation approach needs to provide assurances with respect to microbial safety of the milk and be balanced with the need to ensure that food safety is not compromised. Fonterra like the dairy industry supports continued research into possible alternative technologies.

ABOUT FONTERRA

Fonterra is a global leader in dairy nutrition - the preferred supplier of [dairy ingredients](#) to many of the world's leading food companies and is also a market leader with our own [consumer dairy brands](#) in Australia/New Zealand, Asia/Africa, Middle East and Latin America. The [farmer-owned](#) New Zealand co-operative is the largest processor of milk in the world, producing more than two million tonnes of dairy ingredients, value added dairy ingredients, specialty ingredients and consumer products every year. Drawing on [generations of dairy expertise](#), Fonterra is one of the largest investors in dairy based [research and innovation](#) in the world. Our more than [16,000 staff](#) work across the dairy spectrum from advising farmers on sustainable farming and milk production, ensuring we live up to exacting quality standards and delivering every day on our customer promise in more than 100 markets around the world.

In Australia, Fonterra operates [manufacturing sites across Victoria, Tasmania and New South Wales](#) and employs around 2,000 people. Fonterra collects around 1.6 billion litres of milk annually from almost 1,300 farmer suppliers and their 300,000 dairy cows. This milk is made into the many Fonterra dairy foods that generations of Australians have grown up with and love, including Perfect ItalianoTM, MainlandTM, Western StarTM and Nestle[®] Ski^{®}. The business also sells dairy ingredients to many of the world's leading food companies and it operates a dedicated sales channel for the [foodservice](#) industry, providing a full range of dairy products specifically designed for commercial kitchens.*

*Used under licence by Fonterra Brands (Australia) Pty Ltd. © Registered Trade Mark of Société des Produits Nestlé S.A. Vevey, Switzerland. NUTRITIONAL COMPASS ©

Thank you for the opportunity to provide comment on P1022 and if you have any queries please do not hesitate to contact me on mobile [REDACTED] or email [REDACTED]

Yours sincerely [REDACTED]

[REDACTED]
Regulatory Manager Australia