

18 August 2014

Project Manager
Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610

Dear Sir/Madam,

Proposal P1022 – Primary Production & Processing Requirements for Raw Milk Products

Comments on 2nd Call for Submissions

1. This is to respond to the 2nd Call for Submissions in relation to FSANZ's consideration of a proposal to extend permissions for the production and sale of raw milk products (Proposal P1022).
2. Proposal P1022 has been prepared to assess additional requirements for the safe production of raw milk products and follows on from Proposal P1007. In the first round of consultation, this Association supported Option 1, the development of additional requirements for the production of raw milk products where it can be demonstrated:
 - (1) that the intrinsic physico-chemical characteristics of the raw milk product do not support the growth of pathogens, and
 - (2) there is no net increase in pathogen levels during processing.
3. FSANZ has decided to endorse Option 1 and prepare draft variations to standards 4.2.4, 4.2.4A and 1.6.1. The FBIA strongly supports this decision.
4. The decision is a sound and scientifically justified advance on the thorough basis developed through P1007. As well, this approach will eliminate the need for a product-by-product assessment by FSANZ.
5. In relation to imported raw milk products, we note that FSANZ will be working closely with the Department of Agriculture in developing the risk management approach to be applied to imported products. FSANZ will be providing assessment advice to the Department of Agriculture on whether imported raw milk products present a medium or high risk to public health.

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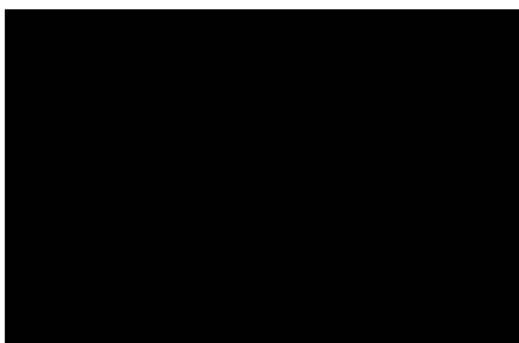
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We support this approach as the best way for providing a high level of assurance that imported raw milk products have been manufactured under production and processing controls that ensure public health and safety. We note that this approach is also entirely consistent with current practice in the administration of the Imported Food Control Act.

Please do not hesitate to contact me if you have any questions on these comments.

Yours faithfully,



A J Beaver
Secretary