



TASMANIAN DAIRY INDUSTRY AUTHORITY

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Standards Management Officer
Food Standards Australia New Zealand

SUBMISSION ON PROPOSAL P1007:

PRIMARY PRODUCTION AND PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS

The Tasmanian Dairy Industry Authority is the agency with the legal authority to enforce Standard 4.2.4 in Tasmania.

The TDIA supports the objectives of Proposal P1007 to enable a greater range of dairy products to be produced in or imported in to Australia and to enable the sale of imported and domestically produced raw milk products to allow domestic producers to compete fairly with international producers, while maintaining an acceptable level of public health and safety.

We support FSANZ's Preferred Approach, Option 3, to amend the current dairy processing requirements in the Code to allow for the production and import of raw milk products that meet the definition of Category 1 and 2 products.

This support is conditional upon demonstration by the business that milk production and product processing capabilities result in a product where pathogens are eliminated and where on-farm controls to achieve very low levels (agreed specification) of pathogens in the raw milk. Processing controls must not allow for the growth of pathogens and the final product properties must not support their growth.

We do have some reservations about approval of Category 2 products. A major concern is how the regulatory framework can distinguish between Category 2 and Category 3 products to avoid confusion and from a risk perspective ensure unsafe products are not manufactured under a Category 2 framework. We consider it necessary that a relatively comprehensive (but not complete) list of products in each category be provided in a detailed interpretive guideline to the primary production and processing requirements for raw milk products.

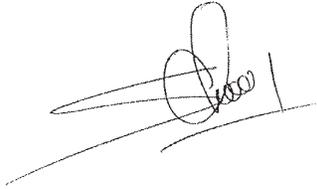
Processors wishing to manufacture Category 2 products would need to have expertise available to determine level of risk and the ability to determine the correct hurdles necessary to ensure food safety e.g. pH, acidity, salt, moisture, starter culture variety, maturation times and temperatures, segregation practices for raw and pasteurised product, appropriate labelling and identification and adequate assurance that product is being appropriately treated at wholesale and retail level.

Farm food safety programs will need increased regulation, including a broader raw milk testing program, increased audit frequency and detailed and more precise farmer training and animal health programs.

In our experience, skills and training for processors would be an issue. It is likely that small processors with little technical and scientific support will be the main individuals likely to want to make such products. This risk must be managed.

End-product testing and farm milk testing would need to be increased and I suggest discussion in the 2nd Assessment Report needs to focus on test frequency:- batch testing, daily testing, hold-and release systems, as well as necessary personnel skills and competencies to support the safety of such products.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alex Schaap', written over a horizontal line.

Alex Schaap
Chairman