

## **Dairy Australia's Submission to FSANZ Proposal P1007: Primary Production and Processing Requirements for Raw Milk Products (Australia Only) – 1<sup>st</sup> Assessment Report**

Dairy Australia (DA) is the dairy industry owned service organisation. Its members are dairy farmers and the industry peak policy bodies, Australian Dairy Farmers and Australian Dairy Products Federation. Dairy Australia is the dairy industry's owned service company, limited by guarantee, whose members are farmers and industry bodies, including the Australian Dairy Products Federation (ADPF) and the Australian Dairy Farmers Limited (ADF).

DA, on behalf of the Australian dairy industry, welcomes the opportunity to provide comments on FSANZ Proposal P1007 Primary Production and Processing Requirements for Raw Milk Products (Australia Only) 1<sup>st</sup> Assessment Report, noting that DA is a member of the FSANZ Standards Development Committee. As such, DA has had the opportunity to provide comments to FSANZ during the development of the Discussion Paper on the Category approach and during the development of this 1<sup>st</sup> Assessment Report.

The Australian dairy industry is the third largest rural industry, providing approximately \$9 billion in value at the retail level, and earning approximately \$2.5 billion in export earnings for the Australian economy. The dairy industry is also a major regional employer, and dairy products are the largest processed food export through the Port of Melbourne. **Whatever decisions are made regarding raw milk products, the industry's excellent reputation as a producer of safe quality dairy products must not be put at risk.**

### **1. General Comments**

Dairy Australia supports the FSANZ preferred approach – namely 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.

**The dairy industry does not support the production and sale of Category 3 products.** The reputation of the Australian dairy industry for consistently producing safe products is of paramount importance. The benefits of this should not be discounted **for perceived advantages** associated with raw milk products claimed by small groups of consumer. The dairy industry agrees with the FSANZ assessment that Category 3 products would present an unacceptable high risk for public health.

While Dairy Australia supports the Category Approach as a good option to deal with the various risks associated with the different product types, this support is based on the expectation that there will be further work undertaken to better define what constitutes a Category 2 or Category 3 product – the boundaries are fairly blurred at present. This is

likely to involve among other things, more detailed validation criteria and process controls for the various Categories.

Support for Option 3 – ie allowing products in category 1 and 2 – is also dependent on the ability to have validated and verified control measures implemented at farm level. **Further attention also needs to be given to the proposed on-farm control measures to ensure there are consistently no pathogens present in the raw milk used for Category 1 and 2 products. This is especially important for those controls around the detection of clinical and subclinical diseases in animals and the potential for farm workers to be possible carriers for human diseases able to contaminate milk which will not be subsequently heat treated. The control measures for all categories, but particularly Category 2 products, also need to take into account the normal bacterial flora on the farm and in the factory environment.** Dairy Australia will work with FSANZ during the next phase to help identify the appropriate on-farm controls and how these may be implemented through State Dairy Food Safety Authorities.

We congratulate FSANZ on a very comprehensive technical assessment and the three Risk Assessments (Raw Cow Milk, Raw Goat Milk and Raw Milk Cheese) would appear to cover the types of risks posed by the various raw milk products. The Technical Assessment, combined with the Consumer Study and the Nutrition Assessment, provide a good basis for assessing the safety of raw milk products. However, as previously noted, further work on the control measures for Category 1 and 2 products needs to be undertaken.

## **2. Category Approach/Implementation**

Category 2 products – while not supporting growth, do allow survival of pathogens. The FSANZ risk assessment identifies that it is critical that pathogens are not present in the raw milk used for raw milk products. It will be essential to implement adequate on-farm control measures to ensure pathogens are absent on farms producing raw milk for raw milk products. Monitoring with revised microbiological criteria (Revision of FSC Standard 1/6/1 – Microbiological limits in food) to confirm non-detectable levels in raw milk used in Category 1 and 2 products will also be essential.

Control measures will need to ensure any pathogens that may be present at non-detectable levels are prevented from growth in all batches of product. Microbiological criteria alone for Category 2 products are likely to be unreliable control measures to provide adequate levels of confidence and other measures will need to be determined. It will also be imperative that the control measures are verified.

It will also be important to consider the implementation of any potential standards for raw milk products in Categories 1 and 2. The feasibility, costs, ability to validate the classification of product category and to verify the control measures etc may outweigh any benefits – this information may only become apparent when considering the detail of state based implementation of the risk management options. It will be important to include this information when the detailed Impact Risk Analysis is undertaken. State food safety authorities will need to be included in this analysis.

### **3. Imported Raw Milk Products**

Australian Food Standards apply to all food for consumption in Australia and provisions for imported products need to be the same or equivalent to the rules for Australian produced products. With the proposed focus on managing the risks for Category 1 and Category 2 products through process controls during production and processing further thought needs to be given to how the production and processing requirements of imported raw milk products will be verified. This includes consideration of pathogens in other countries that are not present in Australia (eg tuberculosis and brucellosis) and measures to ensure the absence of pathogens in the raw milk used to manufacture Category 2 products overseas. Dairy Australia agrees with FSANZ that there are recognised limitations with microbiological testing. Therefore, for imported products, microbiological criteria alone will be inadequate to manage the risks associated with raw milk products. Traceability will also be important – recall protocols need to be in place that can be quickly and effectively implemented. The problems associated with determining the use of melamine in a number of products illustrated the issues associated with product/ingredient identification and recall.

Dairy Australia looks forward to continuing to work with FSANZ in the development of a standard for Category 1 and 2 raw milk products that have appropriate and effective control measures in place to ensure the overall food safety reputation of the dairy industry is maintained.

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