



Australian Government

Department of Agriculture, Fisheries and Forestry

Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610

SUBMISSION TO THE

**PRIMARY PRODUCTION AND PROCESSING REQUIREMENTS FOR RAW MILK
PRODUCTS FIRST ASSESSMENT REPORT (PROPOSAL P1007)**

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF), including the Biosecurity Services Group, is pleased to provide comments on the FSANZ Primary Production and Processing Requirements for Raw Milk Products First Assessment Report (Proposal P1007).

DAFF supports the development of primary production and processing standards within the *Australia New Zealand Food Regulation Ministerial Council - Overarching Policy Guidelines on Primary Production and Processing Standards*. DAFF has a specific interest in reducing the regulatory burden on Australia's food sector. DAFF supports the development of nationally consistent standards to replace current state-based provisions for raw milk products.

DAFF supports the proposed risk management framework that includes product categorisation and gives in-principle support to the preferred approach outlined in Option 3 pending full impact analysis. DAFF suggests that the Second Assessment Report includes more information about how raw milk products will be assessed against the category framework and who will be responsible for these assessments.

DAFF notes that the summary of impacts table in the First Assessment Report does not consider all the potential costs to consumers, industry and government from an outbreak of foodborne illness arising from the consumption of a raw milk product. In particular, DAFF suggests that FSANZ in developing the Second Assessment Report considers the costs to industry from a potential loss of trade; costs to consumers due to illness; and costs to government due to incident response activities and added pressures on the public health system. The impact analysis of any proposed new framework which may allow the manufacture or import of raw milk products should take into account all potential costs and benefits to consumers, industry and government to derive the option that results in net community benefit.

DAFF notes that the New Zealand Food Safety Authority has developed a framework for the manufacture, importation and sale of raw milk products. DAFF supports joint Australia/New Zealand efforts to harmonise food standards to ensure Australian producers will not be disadvantaged by possible New Zealand permissions for the manufacture and importation of raw milk products.

Technical Comments

DAFF suggests that the Second Assessment Report includes a comparison of the proposed requirements for Category 1 products to *The Ordinance on Quality Assurance in the Dairy Industry of the Swiss Federal Council of 18 October 1995* referenced in Standard 4.2.4A – Primary Production and Processing Standards for Specific Cheeses to ensure proposed requirements are not less stringent.

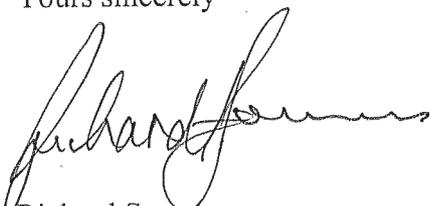
DAFF suggests removing the two seemingly contradictory references to foremilk stripping. On page 58 foremilk stripping is listed among the main risk factors identified for raw milk contamination in Category 3 products, yet on page 77 it is recommended as an additional measure for harvesting and transporting raw milk intended for Category 2 products. Foremilk stripping is not recommended in the Codex *Code of Hygienic Practice for Milk and Milk Products* and DAFF can provide information about international research on foremilk stripping that links this practice to the potential spread of mastitis.

DAFF further suggests that references to ‘housing’ should be qualified given that most of Australia’s milk is produced under an extensive production system and animals are not housed. DAFF suggests inserting the qualifier ‘when used’ after references to housing. For example the reference to housing on page 77 would be amended to ‘operator to ensure any housing, *when used*, is operated ...’

DAFF notes that FSANZ proposes to amend the current thermisation parameters in the Food Standards Code to align with the current practice in New Zealand by adopting the requirement for a minimum of 64.5°C for 16 seconds instead of the current 62°C for 15 seconds. DAFF believes that, before such a proposal is adopted, the analysis in support of the proposal, including information in Table 2, should also consider the effect of additional non heat measures on the pathogen kill. For example, the effect of cheese storage at a temperature of no less than 2°C for a period of 90 days from the date of processing, as currently required in Standard 4.2.4 – Primary Production and Processing Standard for Dairy Products.

Thank you for providing DAFF the opportunity to comment on this report.

Yours sincerely



Richard Souness
General Manager
Food Branch

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