



Queensland Dairyfarmers' Organisation Limited ABN: 90 090 629 066

Queensland Dairyfarmers' Organisation Ltd (QDO)
submission to the
FSANZ Proposal P1007: Primary Production and Processing Requirements
for Raw Milk Products (Australia Only) – 1st Assessment Report

The Queensland Dairyfarmers' Organisation Ltd (QDO) welcomes the opportunity to submit the following comments to the FSANZ Proposal P1007 Primary Production and Processing Requirements for Raw Milk Products (Australia Only) 1st Assessment Report

The QDO is the peak industry organisation representing the interests of and providing services to dairy farmers in Queensland and as such is a key stakeholder in the Australian dairy industry.

The QDO has considered the FSANZ Proposal P1007 Primary Production and Processing Requirements for Raw Milk Products (Australia Only) 1st Assessment Report and presents the following response;

1. the QDO strongly holds the stance that, 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,
2. the QDO would support Option 2, 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, being that Category 1 products are defined as those for which the, properties and / or processing factors eliminate pathogens that may have been present in the raw milk, provided that risk control, traceability and recall measures implemented at farm and processing level are able to be validated and verified with confidence, to ensure there are consistently no pathogens present in the raw milk used and products produced,
3. the QDO further more believes that an additional detailed risk analysis needs to be undertaken on Category 2 products and potential risk management and control measures required to mitigate risks before they could be considered, given the definition that Category 2 products are defined as those products for which the properties and / or processing factors may allow the survival of pathogens that may have been present in the raw milk but do not support the growth of these pathogens, and imported products under this definition could contain pathogens not already present in Australia creating a potential food hazard and biosecurity risk, and given there are recognised limitations with microbiological testing, which for imported products alone will be inadequate to manage the risks associated with raw milk products,

4. The QDO agrees with the FSANZ assessment that Category 3 products would present an unacceptable high risk for public health and as such does not support the production and or sale of Category 3 products, given the definition that Category 3 products are defined as those products for which the properties and / or processing factors are likely to allow the survival of pathogens that may have been present in the raw milk and can support the growth of these pathogens.
5. The QDO believes that the definition of Categories needs to be refined to ensure that the classification of products types and associated risks are clear and enforceable.

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.

The QDO believes that the reputation of the Australian dairy industry for a producer of consistently high quality, safe products is of paramount importance.

The huge benefits of the hard gained, proven international reputation of the Australian Dairy Industry should not be discounted or put at risk just to appease the miniscule questionable perception of small groups of consumers and niche market food commentators of advantages associated with raw milk products.

Yours sincerely,



Brian Tessmann
President
Queensland Dairyfarmers' Organisation Ltd

26th February, 2010