

**PROPOSAL P1007 PPP REQUIREMENTS FOR RAW MILK PRODUCTS:
SAFE FOOD PRODUCTION QUEENSLAND SUBMISSION ON FIRST ASSESSMENT
REPORT**

- The Safe Food Production Queensland (SFPQ) Board is strongly opposed to any changes to the Australia New Zealand Food Standards Code which will increase the possibility of raw milk being made available for human consumption. Currently all raw milk produced on farm must be supplied to a dairy processor for pasteurisation. Under FSANZ's preferred option there is a very real risk that all raw milk may not be supplied to a dairy processor, but may be 'leaked' to consumers, manufacturers or retailers greatly increasing the risk to public health. Such a scenario will create considerable, if not insurmountable, enforcement challenges for food safety regulators such as SFPQ.
- At the commencement of Queensland's Dairy Food Safety Scheme three raw goats milk processors were accredited under the scheme, only one of which is now operating. These operations utilised significant SFPQ resources as a result to the stringent 'test and hold' requirements necessary to ensure the health and safety of consumers. In addition, any test results indicating a failure in the system required SFPQ officers to visit the operation and as well as other follow-up actions which further drained resources.
- It is anticipated that, if permitted under the Code, a majority of raw milk products would be produced by small dairy processors that may not have the resources or expertise necessary to ensure the adequate control and safety of all raw milk products. This would place the whole dairy industry at risk, with the possibility of catastrophic consequences such as those experienced as a result of the actions of South Australia's Garibaldi Smallgoods in the early 1990s. The Australian smallgoods market has yet to fully recover from this food-borne illness outbreak with legal action still ongoing.
- The SFPQ Board has significant concerns regarding the development of policy options for raw milk products being based on a risk management framework that categorises products. This approach provides no clear distinction between the categories and results in discussion on the key policy issue (i.e. the supply of raw milk) being buried within a complex report and risk management matrix which focuses on the supply of raw milk products.
- The SFPQ Board also has concerns regarding how such an approach can be represented as part of a clear and concise standard which could be effectively enforced by jurisdictions.
- To date the process and proposed way forward does not appear to align with the process adopted for similar standards such as UCFM Products, Seafood and Milk. In addition, the standard development process does not align with the proposed Egg and Egg Products Standard and Poultry Standard, which are using the model for the concurrent development of national food standards and their associated implementation plans as developed by Implementation Sub-Committee and agreed to by Food Regulation Sub-Committee.
- As noted in the objectives of the proposal any expansion to the range of dairy products available to the public must be done in a manner that maintains an acceptable level of public health and safety. With this in mind the SFPQ Board cannot at this stage provide a preferred option as further clarity

on the proposal is required before a clear determination can be made on whether public health and safety is maintained at an acceptable level and what the impacts will be on both industry and government. For example for category 2 products:

- (a) What is considered to be 'receipt of milk' and 'the end of the processing stage'?
 - (b) What additional requirements, if any, are proposed for businesses which transport and/or store these products following processing to ensure there is no increase in pathogens prior to retail sale?
- In addition to the above, the SFPQ Board believes that public health and safety may be at risk from products where pathogens are not eliminated, thereby potentially permitting pathogens with a very low ineffective dose (such as *Listeria monocytogenes*) and/or toxin producing properties (coagulase +ve *Staphylococcus*) to be present in milk products.
 - As noted in the First Assessment Report the proposal relates to all raw milk products which may be derived from a number of milking animals including cow, goat, sheep, buffalo and camel. The SFPQ Board seeks clarification on whether the FSANZ Technical Assessment, which appears to focus on bovine and goats milk, can be applied to other forms of milk products derived from animals such as sheep, buffalo and camels.
 - It is noted that the need for specific labelling requirements for raw milk products will be determined during the second assessment within the risk management options identified. The SFPQ Board questions the value of labelling as a risk management tool for foods such as raw milk and requests that evidence to support such an approach be outlined in the second assessment.
 - The SFPQ Board fully supports the removal of the State/Territory exemption from pasteurisation requirements in Standard 4.2.4 and the creation of a single standard which captures all PPP requirements for milk and milk products.