



Government of **Western Australia**  
Department of **Health**  
Public Health

Proposal P1007  
Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA ACT 2610

## **SUBMISSION ON THE 1<sup>st</sup> ASSESSMENT REPORT FOR PROPOSAL P1007 RAW MILK PRODUCTS**

The Department of Health, Western Australia (DOH) would like the following comments and information considered in relation to Proposal P1007 – Primary Production & Processing Standards for Raw Milk Products. In general, the DOH provides in principle support to Option 3 of the Risk Management Options, allowing Category 1 and 2 products.

Please consider the following comments on the matters raised in the assessment report.

### **Classification of products**

- The proposed classification of products will be difficult to define with many combinations of parameters determining the category of product. There is a risk of jurisdictions having varying assessment of products. This would be exacerbated by the batch variation of products, particularly in systems that have less control on production techniques.

### **Microbiological Standards**

- The relevant microbiological standards expressed in Standard 1.6.1 of the Australian New Zealand Food Standards Code (the Code) should be reviewed to reflect the risks associated with the preparation of dairy products.

### **Revision of Division 2 – Dairy Primary Production and Dairy Transport Requirements**

- o It is considered the proposed standard will focus on the controls relating to the preparation of the products from milk supplied to the processor. The category 2 products will permit the survival of pathogens, and hence the quality of the raw milk increases in its contribution to the safety of the final product. Consideration should be given to the current on farm and milk transport requirements in relation to milk that may be used in the preparation of these products. This may include increased food safety requirements given that the milk will not undergo a subsequent pathogen reduction step. This should not be interpreted that the milk is suitable for category 3 products.

### **Need for Development of Implementation Plan**

- o It is considered implementation of a standard that appears to have raised risk levels, along with a potentially complex classification system, will require significant effort in terms of implementation. It is recommended that the implementation process be developed parallel to the standard development to enable effective evaluation of any proposed standard prior to approval

### **Labelling Requirements**

- o Consumers should be made aware that relevant products are prepared from unpasteurised milk and this may be perceived as a higher food safety risk. However, such labelling should not be allowed to make health or nutritional claims unless they can be substantiated under the requirements of the Code

### **Equivalent Requirements for Imported Products**

- o The proposed option allows for the production of category 1 and 2 products within Australia, subject to audited requirements indicating compliance with any food safety requirements considered applicable. This proposed standard will also permit the import of similar type products, which may not be prepared under the controls applied within Australia. Australian food safety regulators should ensure that product prepared overseas and imported into Australia is manufactured under equivalent regulated food safety requirements and equivalent regulatory systems ensuring compliance

### **Training**

- o Given the higher risks associated with category 2 products, significant consideration should be given to the training requirements within the proposed standard to ensure food businesses are aware of the technology aspects of the product being prepared as well as assessment and management of food safety risks.

In summary the DOH considers that there is sufficient evidence to suggest that Category 1 and 2 products may be produced with a reasonable degree of safety. However, care needs to be given to the classification of products and the development and implementation of the proposed standard

Thank you for considering the above comments and information. Should you wish to discuss any of these comments please do not hesitate to contact Bill Calder on (08) 9388 4958 or <mailto:bill.calder@health.wa.gov.au>.

Regards



**STAN GOODCHILD  
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5 March 2010