

10 October 2011

Project Manager
Food Standards Australia New Zealand
PO Box 7186
CANBERRA ACT 2610

Dear Sir,

Proposal P1007 – Primary Production & Processing Requirements for Raw Milk Products

Comments on 2nd Assessment Report

1. This is to comment on the 2nd Assessment Report for Proposal P1007 – Primary Production & Processing Requirements for Raw Milk Products.
2. The Food & Beverage Importers Association (FBIA) has previously commented on both the Discussion Paper and the 1st Assessment Report issued by FSANZ for this proposal.
3. P1007 has been developed by applying a three category framework for examining raw milk products:
 - Category 1 products are those in which the pathogens have been eliminated;
 - Category 2 covers products where pathogens may survive but do not grow;
 - Category 3 products are those where pathogens survive and grow.

We note that FSANZ now proposes to limit the scope of P1007 to raw milk products that meet the definition of Category 1 and to develop a new proposal to consider Category 2 products. This new proposal is to start by the end of 2011 and to include the technical work necessary to support implementation of permissions for Category 2 products.

4. As noted in its previous submissions, the FBIA considers the current Standard is overly and unnecessarily restrictive. While very disappointed with the delay in providing a basis for trade in category 2 products, the Association welcomes any modernisation in the standards governing raw milk products. We trust that

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given the extent of the work already performed on Category 2 products during P1007, the new proposal will be able to be completed relatively promptly and under a definite timeframe.

5. In previous comments, we have expressed concern that a rigid application of the proposed FSANZ approach may lead to cheeses produced in accordance with long-standing good practice by EU members be denied access to the Australian market on the ground that they fall within a broad cheese style that has been deemed generically too risky. We trust the new proposal will not be overly prescriptive, but will allow for producing safe raw milk cheeses through a “preventive” approach along the whole cheese production chain (application and verification of HACCP principles), as occurs in EU members.
6. We have previously noted that the introduction of a raw milk standard should necessitate a review of the microbiological standards for cheese. The current standard sets very tight limits, in particular for *E. coli*, which are out of step with international regulations. Without the setting of appropriate microbiological standards for raw milk cheeses, the development of a raw milk products standard will not result in a wider range of raw milk cheeses entering the market as the current microbiological limits will prove too restrictive. We request that a review of the current microbiological criteria commence at the same time as the new proposal for Category 2 products.
7. In view of the Trans Tasman Mutual Recognition Arrangement, we would also urge that measures adopted in Australia be consistent with the raw milk cheese measures developed by New Zealand.

Please do not hesitate to contact me if you have any questions on these comments.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'A J Beaver', with a long, sweeping horizontal line extending from the bottom of the signature.

A J Beaver
Secretary