

Response to

## **Consultation Paper – Completing the Review of Microbiological Criteria**

**Food Standards Australia New Zealand**

Prepared by Dairy Australia

### **Contact**

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# The Australian Dairy Industry

Dairy Australia welcomes the chance to present this submission in response to the Consultation Paper on Completing the Review of Microbiological Criteria.

Dairy Australia is the national services body for dairy farmers and the industry. Its role is to help farmers adapt to a changing operating environment, and achieve a profitable, sustainable dairy industry. As the industry's research and development corporation (RDC), it is the 'investment arm' of the industry, investing in projects that can't be done efficiently by individual farmers or companies.

Australian dairy is a \$13 billion farm, manufacturing and export industry, with a very positive future.

Australia's 6400 dairy farmers produce around 9.2 billion litres of milk a year.

The Australian dairy industry directly employs 43,000 Australians on farms and in factories, while more than 100,000 Australians are indirectly employed in related service industries.

Our industry has the potential to grow substantially over the next decade to meet growing domestic and international demand.

Realising this growth potential and expanding the industry's economic, social and environment benefits depends on a positive national and international operating environment.

## Response to consultation paper

- Dairy Australia welcomes FSANZ's proposals for completing the review of microbiological criteria. This is an important area of the Code that has not kept pace with the changed approach and context of the rest of the Code.
- As with all regulatory measures, the criteria developed should be risk and science based, and Dairy Australia is happy to assist with technical information regarding dairy products as the review progresses.
- We support an approach that is consistent with international guidelines in this area, including the *Codex Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods*. In particular the distinction between process hygiene criteria and food safety criteria that is proposed is welcomed. As stated in the consultation paper the corrective actions will be very different for these. FSANZ should also consider which criteria are most appropriate for inclusion in mandatory standards, as opposed to accompanying guidance.
- A good example of this in operation is the recently endorsed primary production and processing requirements for raw milk products, where microbiological criteria are needed as process hygiene controls for raw milk used in the manufacture of approved category 2 cheeses. Risk assessment should inform the need for these criteria.
- The classifications of dairy products for which microbiological criteria are defined also need further work based on the microbiological risk of foods and in light of the approach in the primary production and processing standards. Some of the current classifications are confusing to users, for example with references to microbiological limits in foods that are not permitted for sale such as raw milk for retail sale. We understand this will be part of the next step of the review process.
- With regards to prioritisation, Dairy Australia supports criteria for infant formula products being progressed first. It would make sense to follow this up with work on the dairy category, given similarities and the significant risk assessment and other work completed during the development of the primary production and processing standard, and recent work on raw milk products.
- FSANZ should also consider introducing the flexibility to use a range of internationally recognised and validated test methods for each microbiological criteria.