

Dairy Authority of South Australia

ABN 36 767 901 242
33 Hutt Street
Adelaide SA 5000 Australia

Phone +61 8 8223 2277
Fax. +61 8 8232 2463
dasa@sa.chariot.net.au



16 September 2008

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610

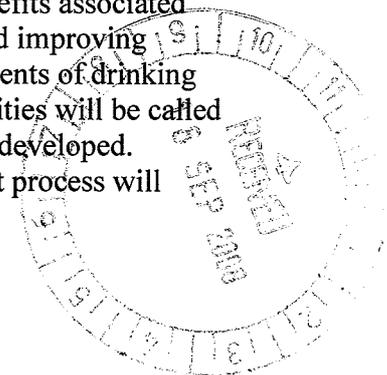
Dear Madam

PROPOSAL P1007 PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS – DISCUSSION PAPER

Thank you for the opportunity to comment on the Discussion Paper. The Dairy Authority of South Australia (DASA) broadly supports the approach outlined in the Paper. The specific objectives described are agreed as is, in principle, the concept of a three-tiered risk category according to whether pathogens are eliminated, can survive or can grow in a dairy food product. DASA does however raise the question of whether FSANZ has considered how it can be established that a particular dairy product can permit the survival or growth of a specific pathogen. Is FSANZ thinking that this can be done on a broad categorisation basis using water activity and pH or other factors or will it allow for a product-by-product categorisation process or a combination of the two? If a product-by-product categorisation process is being considered what role is envisaged for regulatory authorities in the approval process?

With regard to the request for information in Section 5, Microbiological Risk Assessment, on the quantities of raw goat milk consumed, DASA cannot confirm the figures for South Australian production in Section 3.1 of Attachment 1 as there is now only a single licensed raw goat milk producer, whose output is consequently confidential. The estimated sales of 32,000L per annum quoted in the Discussion Paper would now be substantially less due to the reduced number of suppliers.

Section 9.1.1 states that "Consumers ... claim that there are health benefits associated with raw milk. Claims include strengthening of the immune system and improving symptoms of asthma, eczema and arthritis." It seems likely that proponents of drinking raw milk will press this view in the public arena and that health authorities will be called upon to provide a response in the context of how the standard is being developed. Accordingly FSANZ should be clear on how the standard development process will address health claims for raw milk.



Section 9.2 suggests that 'Governments may like to provide information on the implementation costs of the possible options'. Expanding the existing permissions for the sale of raw milk products can only increase implementation costs but at this stage in the development of the Proposal DASA cannot estimate what they will be. Nonetheless, it would be anticipated that any additional auditing or testing costs would be recovered from the raw milk processor. Challenges might arise for DASA should an increase in the manufacture of raw milk products impact on staffing levels but the increase would need to be substantial for this to become a significant issue.

DASA has a concern that allowing the sale of an increased range of raw milk products with varying food safety hurdles needing assessment would be technically demanding for regulators. Should there be an extension to the range of raw milk products permitted for sale, further assistance for regulators in risk assessment, pathogen testing and processing parameter assessment would be necessary.

Yours sincerely

A handwritten signature in black ink that reads "Steve Rice". The signature is written in a cursive style with a large, looped initial "S".

Steve Rice
CHIEF EXECUTIVE OFFICER