

GPO Box 2154
Hobart TAS 7001
17 September 2008

Standards Management Officer
FSANZ

Dear Sir/Madam

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

Environmental Health Australia (EHA), Tasmanian Branch, notes that the Australia New Zealand Food Standards Code currently requires milk for drinking and milk used for cheese making to undergo a heat treatment process unless an applicable law of a State or Territory expressly provides otherwise.

Queensland, New South Wales, West Australia and South Australia have laws in place that allows the production of raw goat milk, that has not undergone a heat treatment process, albeit subject to certain interventions that are designed to ensure the safety of the product. Other States such as Tasmania have not adopted government or sponsored food safety programs to facilitate the production and sale of raw milk products, thereby making the sale of raw milk products illegal.

EHA (Tas) also notes that the Code permits the sale of specific raw milk cheeses including extra hard type cheeses (parmesan types) and Swiss Emmental, Gruyere, Sbrinz and Roquefort cheese – again subject to specific interventions and labelling that are designed to ensure the safety of the product and to inform consumers that it has not been pasteurised.

EHA (Tas) is concerned that the current approach to the manufacture and sale of raw milk product is inconsistent between States and Territories and does not provide a level playing field between domestic and overseas manufacturers.

EHA (Tas) therefore supports the FSANZ assessing the requirements to:

- Achieve consistency of approach across all States and Territories thereby addressing inconsistencies in requirements for the sale of raw goat milk;
- Reduce the need for a case-by-case assessment of an individual product when manufacturers apply to have products approved; and
- Provide a level playing field for domestic and overseas manufacturers of raw milk products.

We are not opposed to the sale of raw milk products provided that a rigorous risk assessment approach is adopted whereby the risks to public health posed

by raw milk products are clearly identified. When these risks have been identified, EHA (Tas) believes that strong government and industry commitment will be required to ensure that the production controls required to manage the risks and ensure a safe product are applied consistently and reliably across Australia. Further, once these controls are identified and agreed to by all parties they will need to be included in an appropriate primary production and processing standard within the Code.

This approach is considered essential if consumers are to have the confidence in the safety of permitted raw milk products. Adoption of raw milk production controls into the Code will provide the necessary legal basis for the administration of the controls and should ensure that State and Territory governments are aware of new demands and adequately resource any new regulatory requirements. In this regard EHA (Tas) believes it is essential that as part of the review FSANZ clearly identifies the responsibilities of both industry and government agencies in ensuring the safety of these products.

Thank you for providing an opportunity to comment on this matter.

Sincerely

(Mark Dwyer)

Tasmanian Branch President

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