

FSANZ Proposal P1022: Primary Production and Processing Requirements for Raw Milk Products

Dairy Australia's Submission

Dairy Australia is the dairy industry owned service organisation, whose members are dairy farmers and the two peak dairy industry policy organisations – Australian Dairy Farmers (ADF) and Australian Dairy Products Federation (ADPF).

Dairy Australia welcomes the opportunity to provide comments on the FSANZ P1022: Primary Production and Processing Requirements for Raw Milk Products. Dairy Australia is a member of the FSANZ Standards Development Committee and has had the opportunity to provide comments during the development of the Proposal.

Category 2 Products (unpasteurised dairy products made from raw milk where pathogens may be present in the raw milk but the products do not support the growth of pathogens) do present risks that if not managed appropriately can result in serious food safety outcomes. The proposal supported during the first consultation recognised this and a whole of supply chain approach to manage the risks was agreed. Dairy Australia supports the category approach as it allows regulation of different raw milk products to be considered proportionate to their risk. However, clear Standards and Guidelines are critical – as is strong enforcement. It is imperative that the State Regulators take a consistent national approach to interpretation, implementation and enforcement – and that the Standards and Guidelines are written to ensure there is no ability for individuals to interpret them differently. We do have some concerns that there will not be national consistency in the interpretation and implementation of the standards and guidelines.

The industry's excellent reputation as a producer of safe, quality dairy products is of paramount importance, and Dairy Australia believes that the provision for raw milk products must protect this reputation.

We make the following comments.

1. Again, we re-emphasise the need for further consideration of the exemption in Standard 4.2.4 for raw drinking milk that allows States and Territory laws to provide for the sale of unpasteurised milk.

FSANZ should reconsider the exemption allowing States and Territory law to either allow or disallow the sale of unpasteurised milk. The dairy industry is a national industry and it is important to have consistent national outcomes. FSANZ's risk assessment concluded that raw drinking milk poses too great a threat to allow its sale - FSANZ should reassess this exemption and promote nationally consistent requirements. We would like to see this risk consistently managed across Australia, with raw drinking milk not allowed to be sold for consumption. The issues currently being experienced in South Australia with cow shares is an example of where ambiguity has led to the inability to manage a serious risk to public health and industry reputation.

2. We note the need for supporting documents and believe those developed are generally helpful, although there are some areas that need further attention eg herd health, microbiological status of raw milk and finished products. The Guide for the primary production of milk for raw milk products is supported. However, the need to have a validated risk management system in place is imperative – as is a way of verifying that the system is appropriate and operating effectively. The status of the Guidelines developed to support the standards also needs to be clearly articulated – as the Guidelines are an integral part of managing the risks.

3. The FSANZ Risk Assessment has previously identified the microbiological status of the raw milk used to manufacture raw milk products as a critical issue impacting on the safety of the final products. Thus the requirement to monitor for the microbiological status of the raw milk, especially for pathogens, is critical and needs to be undertaken at defined minimum levels – eg at least weekly (not left to routinely monitor – as this is not quantifiable and is subject to different interpretations). This is also necessary as manufacturers need to be able to demonstrate no increase/growth in pathogens – so some baseline measures are essential. Testing for E. coli was originally set at weekly - the wording now says “routinely – again, what does routinely mean? E.coli is a hygiene control/indicator, not a pathogen control.
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5. Recognition of the importance of carrier status regarding animal health is vital and is recognised but we do not believe that it is adequately addressed in the proposed standards. While the importance of carrier animals is acknowledged, there are no microbiological requirements for EHEC/STEC monitoring. We also believe that these microbiological criteria should be in the Standard and not merely in the guidelines. Clause 20 is not sufficient – requirement should be to monitor milk weekly for pathogens and if there are detections, then individual animals need to be tested and suspect/infected animals excluded from the herd.
6. Imported products – we note that FSANZ has advised it “will use the assessment to inform their risk management approach under the Imported Food Inspection Scheme”. However, it is not expected to have the border actions finalised for implementation at the time of gazettal of the amended standard. This needs to be reassessed as it is vital that imported eligible raw milk products are subject to the same stringent requirements (NZ product included) as Australian made products. All the risk assessment and management work for raw milk products and the category approach will be negated if imported products are not verified as meeting equivalent management criteria. The past arrangements of only testing a sample of imported products against microbiological criteria will not be satisfactory for Category 2 raw milk products under the proposed standard. Evidence of the whole chain management system will also be required. Roquefort cheese does specify the production system, although end product testing is used at the entry point to Australia.
7. One key factor in ensuring safe products made from raw milk is the competency of the people making the products, across the chain – some level of expertise should be required – especially with regards to the validation of the production process.
8. It will be important that the current review of the Food Standards Code does not inadvertently negate the role of Guidelines as these are an integral part of managing the risks associated with Category 2 Raw Milk products.

Dairy Australia looks forward to continuing to work with FSANZ in finalising a standard for Category 2 products with appropriate and effective control measures to ensure the overall food safety reputation of the dairy industry is maintained. The difficulty of establishing that a product is eligible for Category 2 is recognised and verification will be required that these products continue to meet Category 2 risk management criteria throughout the whole life cycle of the products – prefarm, farm, manufacturing, transport, retail and consumers.

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 - Manager Sustainability including Food Safety & Integrity

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