

PROPOSAL P1022 PRODUCTION AND PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS.

SA Health and Department of Primary Industries and Regions South Australia (PIRSA) and the Dairy Authority of SA

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Thank you for the opportunity to provide comments on P1022.

Scope

- The scope of the definition for “raw milk product” should be limited to cheese made from raw milk. The Proposal P1022 report describes specific control measures based on scientific assessment to be applied to cheese made from raw milk. The definition should not include other raw milk products as they do not have specific control measures described in the assessment report and supporting documents.

The drafting for Standard 4.2.4 Subdivision 4, Clause 32(b) for additional and specific control measures are described for a dairy processing business that makes cheese using raw milk and not other products such as fermented milk products and butter. The specific control measures for dairy products other than cheese made from raw milk are not provided in the drafting and are not scientifically assessed in the accompanying report. Until there is demonstrated certainty that public health and safety can be achieved for raw milk products other than cheese, they should not be included in Standard 4.2.4.

- The Standard 4.2.4 Raw milk products should initially be restricted to cheese made from raw milk. If the scope of the definition of “raw milk products” is not amended by FSANZ to be limited to cheese, an alternative would be to draft a Schedule to Standard 4.2.4 specifically for cheese. As other raw milk products such as fermented milk products are scientifically assessed for safety they could be later added in a separate schedule to Standard 4.2.4.
- Reference in Clause 32(b) is made to measurable parameters such as the pH reduction, salt concentration and moisture content to prevent the growth of pathogenic microorganisms. Water activity must be included to assist in defining raw milk products as it an important control measure to ensure public health and safety.

Skills and knowledge

- It is important that the drafting of Standard 4.2.4 requires that dairy processing businesses have the level of skills and knowledge to make the raw milk products safely. While the standard requires validation and approval of a food safety program, the drafting should make it clear that possession of an appropriate level of skills and knowledge by the dairy processing business is a requirement.

Validation

- Clause 34(4) “A raw milk product must not support the growth of pathogenic microorganisms” should be amended to “The processes applied to produce a raw milk product must be validated to ensure pathogenic microorganisms can be prevented, or reduced to acceptable (critical) level”. It is important that it is clear that validation is required to demonstrate that raw milk products do not support the growth of pathogenic microorganisms for public health and safety.