

## submissions

---

**From:** [REDACTED]  
**Sent:** Wednesday, 30 July 2014 9:28 AM  
**To:** submissions  
**Subject:** P1022 2CFS CFIA submission (was Re: Second call for submissions on raw milk proposal) [SEC=UNOFFICIAL]

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Thursday, 24 July 2014 11:07 PM  
**Subject:** Fwd: Re: Second call for submissions on raw milk proposal [SEC=UNOFFICIAL]

Hello [REDACTED]

I am resending CFIA comments to you in [REDACTED] absence

Regards

---

[REDACTED]  
Director / Directrice  
Food Safety Division / Division de la salubrité des aliments CFIA / ACIA  
[REDACTED]

>>> [REDACTED] 2014-07-24 9:04 AM >>>  
[REDACTED]

Below are comments from the CFIA:

The document very comprehensive including all on farm controls and is similar in this regard to controls proposed in Health Canada's (HC) code of practice.

The criteria proposed for Salmonella, Staphylococcal enterotoxins, L. monocytogenes are in line with Health Canada's Interpretive Summary and Listeria Policy as well as the International Commission on Microbiological Specifications for Foods (ICMSF) 8.

The document indicates standards for raw milk 200,000 somatic cell count and 100,000 total plate count. Also milk cannot be more than 8C and must be used within 24 hour of milking. Whereas Canadian requirements are 400,000 somatic cell count and 50,000 total plate count. Milk should be at 4C within 2 hours of milking and must arrive at the processing facility at 6C or below preferably 4C.

The primary document indicates a requirement to demonstrate that there is no net increase in pathogen levels during processing (sections 1.1 and 2.1; pages 4&5 respectively). Clause 33(3) of Supporting Document 1 (page 27) indicates the processing of raw milk products must start within 24 hours of milking. When cheese is subjected to a 60 day ripening period would this be considered part of the processing? Also, question why there is no requirement for the demonstration of limited microbial growth within the stated shelf-life of the product? Could this be critical to other types of raw milk products?

Division 5 of the Supporting Document 1 (page 6) provides further clarification around the definition of "raw milk products", however it is still not clear if it may also include other liquid dairy products such as cream.

Item 22(3) in Attachment A of the primary document indicates "only potable water must be used (a) on equipment used to milk animals; (b) to clean the teats of animals; and (c) for washing by persons milking

animals." This should be expanded to include (d) cleaning the milking area and (e) cleaning all equipment that comes in contact with the milk.

This is supported by Clause 22(3) of Supporting Document 1 (page 13) which clarifies that "the water supply used within the dairy for sanitizing and rinsing the milk plant, for washing teats, mixing up of teat dips and hand washing for operators should be potable."

CFIA's review of the scientific literature support the FSANZ document requirements for strict control over the pH development in cheese making.

Document is titled Primary Production & Processing Requirements for Raw Milk Products but focuses on raw milk cheeses. Would other raw milk dairy products (other than cheese) would/will be considered if a validated processes is provided?

Regards

---

Director / Directrice  
Food Safety Division / Division de la salubrité des aliments CFIA / ACIA