



**Queensland
Government**

Queensland Health

HEALTH PROTECTION DIRECTORATE

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

Dear Sir / Madam

Submission – Proposal P1007 – Primary Production and Processing Requirements for Raw Milk Products (Australia only)

Thank you for the opportunity to provide a submission on the 1st Assessment Report for Proposal P1007.

Queensland Health has consulted with other relevant Queensland Government agencies on this proposal, namely Safe Food Production Queensland and the Agriculture, Food and Tourism Group of the Department of Employment, Economic Development and Innovation. As a consequence Queensland Health, as lead agency in Queensland for coordinating policy advice relative to the national policy on food regulation, submits the following comments for Proposal P1007.

Generally speaking, we support Australian producers being given the same opportunity as European cheese makers in the Australian domestic market to sell speciality cheeses. However, we are unable to state a position or a preferred option on the proposal at this stage as it is considered that there is insufficient detail in regard to the risk assessment and risk management for both the processing and sale of specific raw milk products (such as soft and hard cheeses) and the consequences of allowing raw milk into the market.

We specifically raise the following concerns relating to raw milk products –

- (i) the potential risks to public health and safety as a result of a greater range of raw milk products entering the market;
- (ii) the substantial compliance costs expected to be imposed on the dairy industry, and potential serious ramifications to the whole industry as a result of a food-borne illness outbreak linked to raw milk products; and

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- (iii) the considerable implementation, monitoring and enforcement costs for governmental food regulatory agencies in what is expected to be a very small component of the whole dairy processing sector.

Therefore, in order that we can further consider the proposal, we request FSANZ to undertake the following actions:

- (i) Undertake a microbiological risk assessment of raw milk from the milking animals referred to in the 1st Assessment Report apart from cow and goat i.e. sheep, buffalo and camel.
- (ii) Define and publish all relevant parameters, safeguards, or production processes which are required to ensure the safety of raw milk products. In this regard we also strongly recommend that FSANZ continue to validate the safety of any new raw milk products or related new technologies. It is appropriate that decisions of this nature are made at the national level by FSANZ to ensure consistency of the requirements throughout the States and Territories and to avoid duplication. Additionally, we believe that FSANZ has the required expertise in these areas and is better resourced and therefore more suitably placed than the States and Territories to make relevant decisions.
- (iii) By way of a Regulatory Impact Statement indicate the approximate costs to industry in implementing the necessary systems/hazard controls and to governmental regulators in regard to enforcement measures required to ensure such systems and controls are in place. This information is sought as there is serious concern that there will be substantial costs to governmental regulators in implementing new and additional regulatory systems associated with enforcement or monitoring that will be required to ensure that raw milk products are safe.
- (iv) Investigate through epidemiological studies that there is no link between STEC infection and the consumption of raw milk products where the growth of pathogens is inhibited, but not eliminated, and which may result in STECs being present in low numbers. Since STECs have a very low infective dose and the acidification that occurs during cheese manufacture may not be sufficient to kill these organisms, their presence in a raw product is a concern to us.

Should you have any queries regarding this submission, I will be pleased to assist you and can be contacted on telephone (07) 3328 9310.

Yours sincerely



Tenille Fort
Director
Food Safety Policy and Regulation Unit