

Dairy Australia's Submission to FSANZ Proposal P1007: Primary Production and Processing Requirements for Raw Milk Products (Australia Only) – 2nd Assessment Report

Dairy Australia is the dairy industry owned service organisation, whose members are farmers and industry bodies, including the Australian Dairy Farmers, and the Australian Dairy Products Federation.

Dairy Australia welcomes the opportunity to provide comments on the FSANZ P1007 2nd Assessment Report on Primary Production and Processing Requirements for Raw Milk Products, noting that Dairy Australia is a member of the FSANZ Standards Development Committee and has had the opportunity to provide comments during the development of the Report.

Dairy Australia supports the approach FSANZ has taken at the 2nd Assessment Report.

The industry's excellent reputation as a producer of safe, quality dairy products is of paramount importance, and Dairy Australia believes the approach taken protects this reputation.

Dairy Australia has been supportive of the category approach as it allows regulation of different raw milk products to be considered proportionate to their risk.

FSANZ's decision to allow the sale of Category 1 products immediately is an important step forward in allowing appropriate products to be produced and sold, and improving consistency for imported and domestically produced goods.

We support immediate application of this variation from the date of gazettal. In this case industry does not require the usual time to adjust to a new burden as this variation relaxes current requirements.

Dairy Australia looks forward to continuing to work with FSANZ in developing 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. We recognise that there are a range of issues that remain outstanding with these products, and considerable work remains to ensure these can be safely sold. Further work is also required to define what constitutes a Category 2 product and to determine the additional control measures to manage the identified food safety risks in these products, based on consistent and defensible scientific criteria.

As put forward by FSANZ, further work should not hold up approval of Category 1 products, and should use all previous work conducted as part of P1007.

With regard to Category 3 products, Dairy Australia agrees with FSANZ's assessment that the production and sale of these products (including raw drinking milk) would present an unacceptably high risk for public health, and as such would put at risk the reputation of the industry for producing safe, quality products.

Being a natural product, raw milk is susceptible to contamination with bacterial pathogens, but is made safe by a combination of modern on-farm hygiene and milk handling and storage practices and pasteurisation.

Because of the increasing interest in 'natural' foods and minimal processing, alternatives to traditional pasteurisation are always being examined; however, any change has to be balanced with the need to ensure that food safety is not compromised.

The dairy industry supports continued research into possible alternative technologies, but at this stage it believes that pasteurisation by heat treatment is essential to ensure that Category 3 products are safe to consume.