

# FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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## SUBMISSION

23 September 2011

Attention: **Project Manager – P1007**

Food Standards Australia New Zealand  
Box 7186,  
Canberra BC,  
ACT, Australia, 2610.

**Re: Primary Production & Processing Requirements for Raw Milk Products – 2<sup>nd</sup> Assessment Report**

FTA Australia has reviewed this [Proposal](#) and endorses the following comments of the Technical Sub Committee:

The Committee reviewed the document and preferred Option 3 – to amend the Code to allow for Category 1 & 2 products and commented as follows:

1. This Proposal has been under discussion and in development for several years and yet the preferred option of FSANZ is Option 2 - to only permit Category 1 products that will allow cheeses that are heat treated to > 48°C and hence to defer the option of unheated soft cheeses that do not allow for pathogen proliferation to another unannounced and probably undetermined time.
2. The question is begged as to what amount of assistance would industry gain from a partial heat treatment of >48 °C in the production of the range of the nominated and desired types of cheeses. It is considered that this apparently strange procedural step, that may or may not have any value to industry and should be explained and justified.
3. It is believed that the major purpose of this Proposal originally was to allow fresh/unpasteurised milk to be transformed into cheeses with enhanced flavour and texture so as to compete with overseas similar types, some of which are being imported and currently available in the market.
4. It is considered that by stating that by not progressing to Category 2 products due to the reported difficult nature of the work involved and that more time is required, this Proposal has lost its original intent and the expectations of stakeholders.
5. The Preferred Option of FSANZ will permit only cheese that is processed by partially pasteurised (i.e. >48 °C) and does not address the basis of the original Proposal or various Applicants that have been withdrawn or placed on hold in an expectation that these matters were to be addressed in this Proposal.

6. If the Preferred Option 2 is adopted then any further progress towards Category 2 products will be many years away.

If there are any queries regarding this submission, please contact the Technical Secretary, Tony Zipper, Telephone (03) 9532 8213, Fax (03) 9532 8213, Mobile 0409 324 075, E-mail [tzipper@dodo.com.au](mailto:tzipper@dodo.com.au).

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Proposal](#).

Yours sincerely,

Paul Habojan – President  
Food Technology Association - Australia