



Dairy Australia Submission to FSANZ Discussion Paper: P1007 - Primary Production and Processing Requirements for Raw Milk Products (Australia Only)

Dairy Australia is the dairy industry owned service organisation. Dairy Australia (DA) welcomes the opportunity to provide comments on the FSANZ P1007 Discussion Paper, noting that DA is a member of the FSANZ Standards Development Committee and has had the opportunity to provide comments during the development of the Discussion Paper.

1. General Comments

Dairy Australia supports the objectives of Proposal P1007 and the suggested Category approach. The issues identified relating to raw milk are varied and are expressed in a variety of ways, depending on the milk producing species and raw milk product types being considered. The Category approach would appear to offer a consistent and systematic approach to managing the different categories of products proportionable to risk. While some indication of the types of products being considered under each category has been given, until the corresponding risk assessments and proposed control measures are elaborated, it is premature to provide detailed comments.

The following general comments are provided for consideration during the next stage of Proposal P1007.

a) Extension of Standard 4.2.4

The raw milk and raw milk products considerations in P1007 will be included in Standard 4.2.4. Currently this standard covers dairy products from farm to processing, including transport. Discussion of P1007 appears to consider the whole chain through to retail/consumers. The dairy industry has requested that there be one standard for milk and milk products that covers the whole spectrum from heat treated products to raw milk products to products made using alternative technologies. However, there will need to be different scopes and management requirements to match the different risk profiles, especially for raw milk products where pathogens may grow and/or survive during manufacturing and prior to consumption (storage). This may mean that the scope of the standard may need to be extended for certain products (eg to cover transport and storage prior to consumption for some raw milk products).

b) Consumer Research

The information being sought will be difficult to put into context. Asking questions on beliefs and potential consumption without providing information on risks and potential management options may give biased results which are not scientifically sound. Consequently, it may not be appropriate to use the information collected under the consumer research to categorise products.

For example, the issues noted (on P14 of the Discussion Paper) as affecting consumers are really generic issues related to any regulated product. Processors currently regulated under Standard 4.2.4 could also argue that they are locked into a set range of products and not able to provide innovative new products. Likewise, current limitation of products under any Standard potentially means consumers could feel that they have lost their freedom to make their own decisions about foods they purchase. FSANZ's mandate to protect public health and safety could already be deemed to restrict consumers' choice across many products – but surely this is preferable to consumers being put at significant risk.

Information about potential purchasing habits also needs to take into account the likely time between purchase and consumption. Category 3 products are particularly susceptible to storage time and condition – not just by the processor and retailer – but the consumer also.

c) Microbiological Risks

The risk assessment for all categories, but particularly Category 2 and 3 products, also needs to take into account the normal bacterial flora (carriers) on the farm and in the factory environment.

d) FSANZ Objectives

The key objectives for FSANZ to consider with respect to raw milk products are:

- Protection of public health and safety
- Provision of adequate information

While consumers can read label information, they also need to understand all risks to all classes of consumers – particularly children, pregnant women and elderly consumers – so that an individual consumer's choice is not extended to others who may be unknowingly put at risk. Serious illness in these vulnerable groups who may not have access to label information have been reported in association with raw milk products in overseas countries where these products are approved.

e) Current "raw milk" provisions

The stated objectives of P1007 are:

- Nationally applicable standards rather than state based provisions
- Replacing current references to legislation in other countries
- Applications for extended permissions

What are the consequences of the second of these objectives? Will the current permissions for some Extra Hard Grating Cheeses, Roquefort etc be revised? At present, they come under provisions within Standard 4.2.4. How will they be categorised?

2. Category Approach

Category 2 products – while not supporting growth, do support the survival of pathogens. Control measures will need to ensure any pathogens that survive are at a low level. Microbiological criteria for these products may be an unreliable control measure to provide adequate levels of confidence.

It will be imperative that the control measures are verified. It may also be difficult to provide directions as to what constitutes appropriate control without reverting to a case by case basis for each type of product. Absence of pathogens in raw milk may be required for this category of products.

3. Implementation

The new FSANZ model for developing Primary Production and Processing Standards includes implementation in parallel to standards development.

Proposal P1007 would benefit greatly if implementation was considered concurrently with the assessment of what fits in which Category. On page 13 of the Discussion Paper, it is noted that the options developed for raw milk products will be based on:

1. Microbiological risk assessments
2. Social science assessment
3. Technical feasibility of control measures
4. The ability to validate and verify potential control measures or other interventions
5. The risks associated with the interventions to industry, governments and consumers compared with the benefits they achieve
6. Australia's rights and obligations under WTO

It will be important to consider the implementation of any potential standards to obtain meaningful information on points 3, 4 and 5 above. The feasibility, costs, ability to verify the control measures etc may outweigh any benefits – this information may only become apparent when considering the detail of state based implementation of potential risk management options.

As previously stated in 1b), the results on consumer research may not provide reliable information to use in the Category approach.

4. Production of Raw Milk Products

As mentioned previously, until there is further elaboration of the categorisation of products and the proposed control measures, it is difficult to provide definitive comments on the discussion paper at this stage. The Category approach appears to offer a systematic approach to dealing with raw milk products. The suitability of the approach will be best determined when the risk assessment is known, together with the proposed controls.

The reputation of the Australian dairy industry for consistently producing safe products is of paramount importance. The benefits of this should not be discounted **for perceived advantages** associated with raw milk products claimed by small groups of consumer.

The Australian dairy industry is the third largest rural industry, providing approximately \$9 billion in value at the retail level, and earning approximately \$2.5 billion in export earnings for the Australian economy. The dairy industry is also a major regional employer, and dairy products are the largest processed food export through the Port of Melbourne. The dairy industry is concerned that whatever decisions are made regarding raw milk products, the industry's reputation as a producer of safe quality dairy products is not put at risk.

The dairy industry supports alternatives to pasteurization in the production of dairy products, provided that an equivalent level of risk management is achieved.

We look forward to continuing to be involved in understanding the risks and any suggested management options for each of the proposed categories.

Helen Dornom
Manager, Technical Issues
Dairy Australia
Level 5, IBM Centre
60 City Road
Southbank Vic 3006
T: 03 9694 3777
E: hdornom@dairyaustralia.com.au

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