

THE FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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SUBMISSION

17 September 2008

Attention: Project Manager – Proposal P1007

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

Re: - Primary Production & Processing Requirements for Raw Milk Products
- Discussion Paper

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

The Committee discussed this Paper and made the following comments:

Category 1 products, where pathogens that may have been present in the raw milk are eliminated, are considered to be satisfactory to be produced in Australia and will be adequately standardised and regulated as proposed.

Category 2 products, which may allow the survival of pathogens present in the raw milk but do not support the growth of these pathogens, are considered to require a higher degree of testing prior to sale and contain more warning statements on the label or accompanying the products at point-of-sale and more vigilance in production, storage, etc than Category 1 products. The proposed Standards must reflect these aspects. Also Category 2 products will require more clarification in their definition in the proposed Standards to adequately distinguish them from Category 3 products.

Category 3 products, which are likely to allow survival of pathogens that may be present in the raw milk and may support the growth of these pathogens, require to be individually defined and individually listed products, rather than as a category of generic products. These products will require a base microbiological specification which may have to be varied, to be stricter and not more lenient, dependent on proposed processing, storage, etc. Each product will require separate and specifically approved processing, storage and label, etc conditions.

Overall the Committee considered that this Proposal should continue to be developed, provided that all risks are fully considered and that enforcement is practical and possible. A regular and independent testing regime should be introduced as part of the enforcement procedure.

If there are any queries regarding this submission, please contact the Technical Secretary, Tony Zipper, Telephone (03) 9523 8213, Fax (03) 9523 8213, Mobile 0409 324 075, E-mail 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,

Rob Richards
PRESIDENT – FTA AUSTRALIA

