

Proposal 1007 – PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS (Australia Only)

Submission - Discussion Paper

The Authority notes that this Discussion Paper provides the first opportunity for comment on P1007 and will assist FSANZ with information and data to assist in its assessment. With this purpose in mind, the Authority offers the following comments.

In broad terms, the Authority accepts the issues and objectives identified in the Paper and endorses the outlined 'category framework approach'.

Without pre-empting the outcome of the risk assessment, the Authority notes that a niche market for Category 2 products is likely to be attractive to micro, small and start-up businesses. Processors lacking the experience and craft skills of overseas processors will impose a significant compliance burden on state agencies. The risks attributable to new entrants must be considered if approval of category 2 products is recommended.

The Authority notes that a document, with similar intent to the Discussion Paper, issued by the New Zealand Food Safety Authority is explicit about the unlikely approval of Category 3 products. FSANZ should also be explicit about the future of Category 3 products early in the process and certainly as soon as the risk assessment has been completed.

Details of the legislation and associated requirements for New South Wales (Attachment 2; Section 1; page 25) are no longer current. This current information is:

Food Regulation 2004
NSW Dairy Manual – Goat / Sheep milk package

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The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.