



18 September 2008

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Submission to: -

Food Standards Australia New Zealand

**In response to
Discussion Paper for**

Proposal P1007:

**Primary Production and Processing
Requirements for Raw Milk Products
(Australia Only)**

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Preface

Parmalat Australia Ltd (a wholly owned subsidiary of Parmalat S.P.A.) specialises in the production of branded milk and dairy products and is one of the major manufacturers of milk, yoghurt and fresh dairy products in Australia. The company has an impressive stable of well recognised, popular milk and dairy product brands. These include Parmalat, Pauls, Trim, Rev, PhysiCAL, Zymil, Breaka, Ice Break and Vaalia. Consistent with the aims of its parent, Parmalat Australia strives to gain recognition for the high quality of its products, for its ability to innovate and ultimately as one of the top players in the added value functional food segment.

Parmalat has manufacturing facilities in Queensland, Victoria and Northern Territory supplying product to all States within Australia. Exported products are primarily UHT Milk and milk beverages coupled with a small percentage of fresh dairy products, which are distributed to South East Asia and Pacific Rim countries.

Parmalat has sales of approximately \$700 million per annum derived almost solely from the sale of pre packaged milks, fresh dairy products and juices to the retail, route, and foodservice markets.

Summary

Parmalat supports in principle the application of a category framework approach as the basis by which raw milk products will be approved for manufacture or importation to enable sale of these products within Australia. Inconsistency in current legislation that allows for the sale of raw goat milk in some States, and the ad hoc approval process currently applied to imported raw milk cheeses, needs to be rectified through the introduction of regulation within Standard 4.2.4 of ANZFSC that would

- Provide a nationally consistent approach to permissions for sale of raw milk products.
- Provide an acceptable level of consumer protection
- Remove regulatory barriers preventing local manufacture of equivalent raw milk products imported into Australia.

In keeping with the principles of the PPP standard, we continue to support an outcome based risk management approach to food safety that is consistent with internationally recognised standards and food safety principles. Detailed comment will be made following the release of the 1st Assessment Report, where by further information would be provided as to types of products within the three categories proposed, and the control measures that would apply in managing each category.

Key Issues

In consideration of FSANZ developing a standard for raw milk products, we have identified the following issues:-

1) Collaboration with NZFSA

It is gratifying to note that FSANZ will be progressing work on P1007 in collaboration and close consultation with NZFSA. We believe it crucial that there is a common outcome for permissions within Australia and New Zealand via FSANZ's *Primary Production and Processing Requirements for Raw Milk Products* and NZFSA's *Proposed Framework for the Manufacture, Importation, and Sale of Raw Milk Products*. Lack of uniformity in standards for raw milk products, would under the TTMRA, allow for sale of raw milk products within either country that would no doubt meet the lowest common denominator.

1.1) Current differences between Australia & New Zealand

It is of critical importance that there is no ambiguity as to the definition of a 'raw milk product' as this will define the scope of the standard. Both Australia & New Zealand do not propose a definition for raw milk, although each denotes raw milk products as those not covered under current definitions for pasteurised (or equivalent) products.

The Australian and New Zealand documents highlight the following differences:

Australia – processing standards

- Pasteurisation and equivalent heat treatments.
- Thermisation (for cheese)
- Other processes of equal or greater lethal effect on any pathogens.

New Zealand – processing standards

- Pasteurisation & equivalent heat treatments
- Thermisation (for cheese)

It is therefore unclear whether ‘non thermal’ processes, validated as equivalent to pasteurisation, are to be considered under P1007, or are already permitted under Standard 4.2.4. The New Zealand proposal would however be expected to incorporate any ‘non thermal’ process whether or not it has been validated as being equivalent to pasteurisation with respect to lethal effect on pathogens.

2) Issues related to proposed categories

2.1) Category Definitions

The category table contained within the discussion paper does not provide sufficient clarity to be able to assess the types of products likely to be treated within this system. For instance, does this category include products where pathogens may be eliminated, e.g. by a non thermal process such as high pressure processing, yet still retain the capability of supporting pathogen growth? One would envisage a totally different set of control measures for this versus a hard cheese that does not support growth of pathogens. Thus there appears to be 2 sub categories of products with in Category 1

- Products where pathogens are eliminated and may grow.
- Products where pathogens are eliminated and do not grow

It is thus logical to assume that any dairy product that meets the processing requirement for milk and dairy products as specified in Standard 4.2.4 (15) is a Category 1 product

2.2) Definition of Pathogens

No definition of a pathogen is included within the discussion document leading to question what pathogens are actually covered within the terms of risk assessment. i.e. all pathogens; or pathogens that are significant in primary production & processing of milk.

NZFSA have provided a definition of pathogens within the NZFSA Discussion Paper clearly stating that **all** pathogens (including bacteria, viruses and cysts) are covered within their definition

2.3) Complexity of Category Framework.

FSANZ states that cheese is the major commercial raw milk product under consideration and the majority of the discussion paper focuses on raw milk cheese. A single classification system for **all** raw milk products may become overly complex when applying control measures especially for products such as butter, cream, ice cream, yogurts, desserts, cultured milks etc. One could envisage that in progressing with the

category approach, treatment of cheeses separate to other dairy products could simplify both the category definitions and control measures applied to each.

3) Conclusion

Parmalat supports the development of a vibrant dairy industry within Australia and any regulatory initiatives that would stimulate growth in the industry. Industry growth would be aligned to meeting consumer needs and expectations for new and innovative products, however any such initiatives must maintain the industry focus on consumer health & safety, thus ensuring its continued reputation as a supplier of safe, quality food to the Australian population. We therefore look forward in providing on-going feedback throughout the development process for P1007 that we trust will lead to a positive outcome for the dairy industry. Parmalat also fully supports comments on the Discussion Paper as provided by Dairy Australia.