



Our Ref:  
Enquiries:

## SUBMISSION

Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA BC ACT 2610

## DISCUSSION PAPER

### PROPOSAL P1007

### **PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS (Australia Only)**

The Department of Health, Western Australia (DOH) has reviewed the Discussion Paper, Proposal 1007.

The DOH supports the development of a national standard that that enables uniform application along with equitable Australian production of imported product equivalents subject to appropriate risk assessment.

The DOH notes the following issues in relation to the discussion paper:

- The challenge in determining the cut off points of the categories in terms of risk assessment so that individual batch variations within a product type are adequately considered.
- Consideration is required in the manufacture of category 2 products where pathogens may survive but not grow to ensure that adequate controls are in place to guarantee pathogen sub infection levels.
- Standards should be food safety risk based and not relate to consumer beliefs and perceptions – risk assessment is scientifically based.
- Decision making based on sociological issues and assessment is not compatible with scientific risk assessment. It would be difficult to design and implement a survey to obtain an unbiased whole of population view in relation to raw milk. Decision making based on sociological surveys may lead to permissions being granted that may

#### **Environmental Health**

All Correspondence: PO Box 8172 Perth Business Centre Western Australia 6849  
Grace Vaughan House 227 Stubbs Terrace Shenton Park WA 6008  
Telephone (08) 9388 4999 Fax (08) 9388 4955  
ABN 28 684 750 332

increase food safety incidents in the community. Remedial action after such an event will be increasingly difficult with the passage of time.

- The discussion paper considers through chain approach to retail level. While retail level is covered by Food Safety Standards 3.2.2 and 3.2.3, Standard 4.2.4 did not consider distribution of dairy products. To provided consistency within the Standard the distribution activities of all dairy products should be considered in developing the revised Standard.

The category approach will provide a structure to consideration of the proposal, but it is essential that safe dairy products are achieved.

Should you wish to discuss the above issues, please do not hesitate to contact me on 08 9388 4920.

Yours faithfully

Stan Goodchild  
**MANAGER**  
**FOOD UNIT**

17 September 2008