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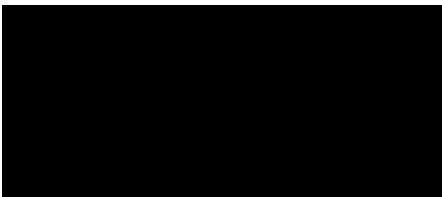
Dear Sir/Madam

The New Zealand Food & Grocery Council notes that the *Call for Submissions – Proposal P1022: Primary Production & Processing Requirements for Raw Milk Products* is dealing with issues for matters outside the scope of the joint food standards setting systems, in this case production and processing matters in Chapter 4.

Nonetheless, I would draw your attention to a concern we have with the *Call for Submissions* document. Section 2.3.2.3 titled “*Standard 1.6.1*” in the document foreshadows amendments to Standard 1.6.1 such as stating that “P1022 will also assess the current limit for E-coli in cheese”. This is of concern from a New Zealand perspective because, as noted above, my understanding is that P1022 is generally dealing with issues that are outside the scope of the joint food standards setting yet is foreshadowing a review of elements in a joint standard, Standard 1.6.1.

Clearly, there are times when there is the potential for overlap between joint and Australia-only standards especially when dealing with processing/production areas. However, any impact on joint standards and, in this case, Standard 1.6.1, needs to be consulted on through a mechanism that addresses standards outside Chapters 3 and 4. While that may be FSANZ’s intent, Section 2.3.2.3 is not that clear and we would simply caution changes being made to joint standards through consultation on Australia-only areas of interest.

Yours sincerely



Katherine Rich  
**Chief Executive**