

Monday, February 22, 2010

Standards Management Officer
Food Standards Australia New Zealand

Re: **Comment on Proposal P1007**
PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW MILK
PRODUCTS (1ST ASSESSMENT REPORT)

The Dairy Authority of South Australia has considered Proposal P1007 and makes the following comments;

- The concept of the risk management framework is supported, acknowledging the fact that this is a new direction in food regulation and may have some implementation difficulties.
- We strongly support Category 3 products being prohibited from sale. The Authority has had widespread experience regulating the sale of unpasteurized cows and goats milk over 17 years. The Authority's own "Risk-Based Assessment on Unpasteurized Goat Milk" carried out in March 2004 also identified that unpasteurized goat milk was a high risk product.
- The Authority supports the sale of Category 1 products but is not prepared to support the sale of Category 2 products at this stage.
- The Authority has a number of concerns with respect to the proposed Category 2 products, which are explained below.
 - The production of unpasteurized milk at farm-level for Category 2 products would need increased regulation including an enhanced unpasteurized milk testing program, increased audit frequency, enhanced farm production food safety programs, enhanced training, greater veterinary involvement.
 - The major concern is how a regulatory framework can distinguish between Category 2 and Category 3 products to avoid confusion & from a risk perspective ensure un-safe products are not manufactured under a Category 2 framework.
 - Processors wishing to manufacture Category 2 products would need to have expertise available to determine level of Risk & the ability to determine the correct hurdles available to ensure food safety e.g. pH, acidity, salt, moisture, starter culture variety, maturation times & temperatures, segregation practices for raw and pasteurized product and adequate assurance that product is being appropriately treated at wholesale and retail.

Skills & training for processors would be an issue. It is likely that small processors with little technical and laboratory back-up will be the main individuals likely to want to make such products and this is seen as a risk.

- End-product testing and farm milk testing would need to be increased and discussion needs to focus on batch testing, daily testing & hold-and release systems to support the safety of such products if allowed.
- A major issue would be faced by Regulators and Auditors who would have the difficult task of approving farmers and processors, validating and verifying risk-analysis & ensuring the on-going attention to detail in audits and assessing product test results. Training for Auditors and Regulators would be a significant issue as would the cost of their services to Industry.
- An essential component of proceeding to the 2nd Assessment will be the need to address issues such as those raised by the Authority & to prepare Guidelines before any Standard is prepared. In addition, training programs for Farmers, Processors, Regulators & Auditors will need to be in-place before the Standard commences.
- Any prohibition of unpasteurized cows and goats milk will increase the underground sale of such products via milk animal-share programs and cosmetic-bath milk products. The increase in popularity of regional and metropolitan farmers markets may require additional surveillance of farmers produce markets along with increased health food & organic food businesses.
- Public awareness campaigns will be essential. In addition the introduction of raw milk products and their safety assurances for public health and safety will need significant reinforcement to explain the on-going potential risk to the consumer and sensitive populations.
- From a South Australian perspective there is a strong community concern that food products must be safe. Past food safety outbreaks have left industry and consumers concerned.
- Any failure of a raw milk product in the Market place will have an impact on the whole of the Australian Dairy industry. South Australia, in particular, has had experience of unsafe products in other sectors and the financial and reputational damage to the industry as a whole has been crippling.

The Authority looks forward to seeing such issues addressed during the 2nd Assessment. The Authority acknowledges the quality of the 1st Assessment reports and associated Risk-Assessments and compliments FSANZ on the quality of this work in assessing a most difficult product category.

Yours Sincerely,

A handwritten signature in cursive script, appearing to read 'C. Cooper'.

Catherine Cooper
Chair