

5 March 2010

Project Manager  
Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA ACT 2610

Dear sir,

**Proposal P1007 – Primary Production & Processing Requirements for Raw Milk Products**

**Comments on 1<sup>st</sup> Assessment Report**

1. This is to comment on the 1<sup>st</sup> Assessment Report for Proposal P1007 – Primary Production & Processing Requirements for Raw Milk Products.
2. The Food & Beverage Importers Association (FBIA) is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia.
3. In our response to the Discussion Paper for this Proposal, the Association supported the proposed three category framework for examining raw milk products:
  - Category 1 products are those in which the pathogens have been eliminated;
  - Category 2 covers products where pathogens may survive but do not grow;
  - Category 3 products are those where pathogens survive and grow.
4. While the FBIA remains supportive of the three category framework, we do have concerns that safety classifications made in the 1<sup>st</sup> Assessment Report, if adopted, might result in some raw milk cheeses that are produced in accordance with EU standards not being permitted to be imported and sold in Australia.

Those safety classifications appear to be based on developing probabilistic models for each of several cheese types (eg, cheddar, blue, feta & camembert). But there are significant variations between cheeses and cheese types and processing factors also vary. Moreover, we understand that in the EU the

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approach to producing safe raw milk cheeses is through a “preventive” approach along the whole cheese production chain (application and verification of HACCP principles).

A rigid application of the proposed FSANZ approach may lead to cheeses produced in accordance with long-standing good practice be denied access to the Australian market on the ground that they fall within a broad cheese style that has been deemed generically too risky. We would urge that a broader approach to food safety assurance than that in the 1<sup>st</sup> Assessment Report be allowed for.

5. We have previously noted that the introduction of a raw milk standard will, in our view, necessitate a review of the microbiological standards for cheese. The current standard sets very tight limits, in particular for *E. coli*, which are out of step with international regulations. Without the setting of appropriate microbiological standards for raw milk cheeses, the development of a raw milk products standard will not result in a wider range of raw milk cheeses entering the market as the current microbiological limits will prove too restrictive. We request that a review of the current microbiological criteria commence as soon as possible and not be delayed until after the raw milk products standard has been developed.
6. In view of the Trans Tasman Mutual Recognition Arrangement, we would also urge that measures adopted in Australia be consistent with the raw milk cheese measures developed by New Zealand.

Please do not hesitate to contact me if you have any questions on these comments.

Yours faithfully,

A handwritten signature in black ink, reading 'A J Beaver'. The signature is written in a cursive, flowing style with a long horizontal line extending from the bottom of the name.

A J Beaver  
Secretary