

SUBMISSION
P1007 – PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW
MILK PRODUCTS (AUSTRALIA ONLY)
Second Assessment Report
By the South Australian Department of Health (SA Health)

13 October 2011

Thank you for the opportunity to comment on the Second Assessment Report for Proposal P1007.

SA Health Position at Second Assessment

The SA Department of Health and the Dairy Authority of South Australia (DASA) have jointly assessed the 2nd Assessment Report for proposal P1007 and are submitting separate submissions, covering the same observations. SA Health offers the following comments:-

- SA Health supports the preferred approach, including the proposed drafting of Standard 4.2.4, to allow for the production and import of raw milk products that meet the definition of Category 1 in Australia (products for which the properties and/or processing factors *eliminate* pathogens that may have been present in the raw milk).
- Specifically, SA Health supports the changes to the 'thermisation' (clause 16(1)(b)) and 'extra hard grating cheese' (clause 16(3)(a)) parameters and the consequential amendments to Standard 4.2.4.A.
- SA Health also supports FSANZ progressing consideration for Category 2 raw milk products, providing adequate control measures are included. It is recommended that FSANZ, with the technical & regulatory assistance of ANZDAC, is best to lead this process including the development of product and performance criteria for inclusion in the Standard, as well as the necessary supporting guidance
- Any consideration of a process for permitting Category 2 products in a future proposal, should note comments made by SA Health at First Assessment in relation to relevant issues.
- SA Health supports Option 4, and specifically the potential permission for Category 3 products, being ruled out altogether
- We also support the removal of the state and territory exemption for raw milk under clause 15(1) of Standard 4.2.4.
- We support the changes to the Standard taking immediate effect from the date of gazettal as there is no impact on the existing industry from the changes.
- It is suggested that the current Interpretive Guide for Standard 4.2.4 - Dairy Processing be amended by FSANZ to align with the changes to the Standard.
- Ongoing consideration needs to be given to issues around imported products and their compliance with the processing requirements of the Standard.

Previous SA Health Position at First Assessment

- SA Health supported Option 2 – amend the Code to allow the sale of Category 1 products only - in order to fully protect public health and safety of consumers.
- SA Health strongly supported the decision by FSANZ to prohibit the sale of Category 3 products due to the public health and safety risks.
- SA Health supported the comments made in the submission provided by the Dairy Authority of South Australia (DASA).

Reasons for SA Position at First Assessment

- SA Health acknowledges the extensive risk assessment prepared by FSANZ on each category of raw milk dairy products and accepts that, with adequate risk management steps, Category 2 products may be safe.
- However, the sale of Category 2 products is not considered acceptable at this stage due to the rigorous control mechanisms and intensive regulatory oversight required to ensure the safety of these products.
- For dairy products to be considered under Category 2, as nominated by FSANZ, there is significant reliance on production processes that do not allow a net increase of pathogens. Additionally, specific on-farm control measures are required to ensure that the raw milk used in the manufacture of these products has very low levels of pathogens.
- SA Health is concerned that such on-farm practices would be difficult to audit or enforce and would place significant resources on DASA and SA Health.
- It is noted that processors wishing to produce raw milk products are commonly small operators with little training or access to adequate testing facilities, thereby increasing the risk of inadequate controls.
- An outcome based Standard would not be considered adequate for raw milk products.
- If Category 2 products are to be permitted, clear delineation between Categories 2 and 3 is required within the Standard to avoid confusion and ensure enforceability of the Standard. SA Health is not in a position to easily differentiate at point of sale, between raw milk products that do not support the growth of pathogens (Category 2) and those that may support the growth of pathogens (Category 3). Therefore should Category 2 products be contemplated, specific measurable parameters (eg. pH, water levels, acidity) should be prescribed in the Standard to enable monitoring and enforcement to ensure food safety.

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