

6 January 2014

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

Dear Sir/Madam,

Proposal P1022 – Primary Production & Processing Requirements for Raw Milk Products

Comments on Call for Submissions

1. This is to response to the Call for Submissions in relation to FSANZ's consideration of a proposal to extend permissions for the production and sale of raw milk products (Proposal P1022).
2. Proposal P1022 has been prepared to assess additional requirements for the safe production of raw milk products where it can be demonstrated:

(1) that the intrinsic physico-chemical characteristics of the raw milk product do not support the growth of pathogens, and

(2) there is no net increase in pathogen levels during processing.

The Food & Beverage Importers Association ("FBIA") welcomes the development of Proposal P1022 and strongly supports the first of the two options being considered by FSANZ. That option (Option 1) is the preparation of a draft variation to Standard 4.2.4 to permit raw milk products where the safety outcomes described above can be demonstrated.

3. Proposal 1022 follows on from Proposal P1007 (Primary Production and Processing Requirements for Raw Milk Products), which established a risk-based category approach to assess permissions for raw milk products. P1007 concluded that raw milk products could be processed with an acceptable level of public health risk where there are combinations of specific production and processing controls in place

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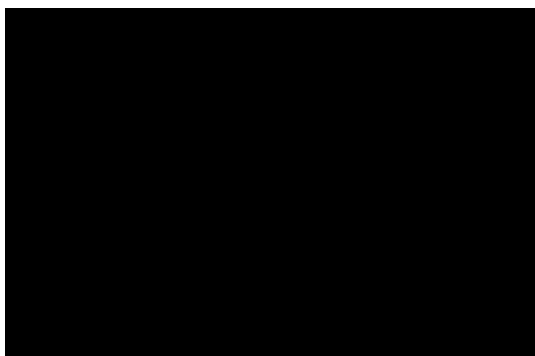


Proposal P1022: Comment on Call for Submissions

4. P1022 is a sound and justified advance on the work developed through P1007, which provided a baseline set of regulatory measures for raw milk products (a documented food safety program, including specific control measures, and specified processing measures). Option 1 adds additional through-chain control measures for raw milk products, as set out in Supporting Document 1, to Standard 4.2.4. As well FSANZ has developed guidance materials, including validation guidance.
5. These measures set a framework for the safe production of raw milk products where the intrinsic physico-chemical characteristics of the raw milk product do not support the growth of pathogens, and where there is no net increase in pathogen levels during processing.
6. As to labelling, the Association agrees that the existing generic labelling requirements in Part 1.2 of the Code are appropriate for raw milk products. We note that suppliers will be permitted to provide further voluntary information on raw milk products.
7. In relation to microbiological limits, the Association notes that appropriate microbiological limits for raw milk products will be developed by P1022. In particular, we note that the current limit for *Escherichia coli* in cheese will be assessed, in line with a wider review of the microbiological limits in Standard 1.6.1, particularly the role of indicator and index (or model) microorganisms. We strongly support this approach.
8. In relation to imported raw milk products, we note that FSANZ will be working closely with the Department of Agriculture in developing the risk management approach to be applied to imported products. Such an approach is consistent with current practice in the administration of the Imported Food Control Act and is welcomed.

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

Yours faithfully,



Secretary