

PROPOSAL P1022 PRODUCTION AND PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS.

SA Health and Department of Primary Industries and Regions South Australia (PIRSA) and the Dairy Authority of SA

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Thank you for the opportunity to provide comments on P1022.

Prescriptive Standard Required

- The high risk nature of raw milk products warrants a prescriptive standard that describes in detail the control measures and limits to be put in place to manage food safety hazards. An outcome based standard may not provide the appropriate level of protection to public health and safety because minimum critical controls are not clearly specified. Precedent is set for other high risk products such as smallgoods which are provided with prescriptive control measures and limits in Standard 4.2.3 of the Food Standards Code. For example, Standard 4.2.3 mandates the application of HACCP, requires hazard levels to be assessed in raw ingredients and after processing, mandates the recording of pH, temperature during fermentation and maturation, weight loss or Aw, mandates the use of starter culture, and also mandates the storage temperature for raw batter and for raw meat ingredients.

Clear definition of Category 2 products

- There appears to be some inconsistency throughout the documents about how 'Category 2 products' are described. There are references to products 'for which the properties allow survival of pathogens but do not support the growth' and others that relate to 'no net increase in pathogen levels during processing'. Previous documents sent to the SDC also refer to the assumption that there are no detectable pathogens in the raw milk.
- It is important that the standard provides a clear enforceable definition so that category 2 products can be differentiated from category 3 products which will not be permitted to be made from raw milk. Reference to measurable parameters such as the combination of pH and water activity to prevent the growth of pathogenic microorganisms should be considered to assist in defining these products.

Identification of additional through chain control measures

- It is important that additional through chain controls measures that have been identified for raw milk products are included in the Standard.
- Parameters for rapid acidification of raw milk by lactic acid producing starter cultures and microbiological testing and limits described below should be considered for inclusion in the standard.
- An important component of this is clearly defining the microbiological limits that must be achieved for a raw milk product:
 - No net increase in the levels of hazards (given the initial level of pathogens should not be detected; and
 - No growth in the final product.

Accreditation and Microbiological testing

- Raw milk, in process and end product limits and testing should be clearly defined in the guide document or the standard as appropriate.
- There is concern that the different limits for E. coli for different foods may cause confusion in interpretation of the standard and guidance documents. Inclusion of an explanatory note in a stand alone table describing the foods that the limits that are applied would assist in interpretation, for example bulk milk used for cheese production not to be confused with milk used for direct consumption.
- The proposed standard should include specific critical limits eg prior to manufacturing (E. coli, Salmonella, Campylobacter; Staphylococcus and enterotoxin); in process (pH, Aw, verification microbiological testing requirements) and final product.
- The proposed standard should include a requirement that only raw milk supplied by an accredited supplier is permitted to produce raw milk products. As the milk supplier and the processor may not be the same business, the standard should also require the raw milk processor to only be supplied milk by an accredited producer and hold evidence of this. This requirement would make it an offense immediately to use raw milk from other than an accredited supplier.

Imports

- Further explanation of how the proposed Standard would be enforced for imported foods at the border and once upon the shelves in shops is requested. How will products in this category be risk assessed and inspected for importation or will overseas manufacturers be approved for importation. Prescriptive standards defining the final product category with set microbiological limits are needed particularly for jurisdictions as these products will be at retail/wholesale when jurisdictions are required to enforce the standard.

Cost of validation

- There is concern about the cost of validation of the safety process used by the raw milk product manufacturer. The cost of validation is expected to be beyond the amount a small business operator could afford. The experiences of New Zealand with the high cost of validation for small operators and for government should be considered in the regulatory impact assessment for the proposed Standard.
- We would like to provide further information on the cost of validation before the next round of public consultation.
- The experience of the Australian smallgoods sector may be useful as the same issues were identified. As a result, and because the majority of smallgoods manufacturing processes are basically the same, Meat & Livestock Australia produced a guideline document which provided validation criteria. This document can be referenced either in regulation, conditions of licence or accreditation, or as part of a manufacturers HACCP program.

Labelling

- Raw milk products are a category that requires appropriate labelling to enable consumers, particularly those at risk, to be distinguishable from pasteurised milk products.

- It is considered that the existing generic labelling requirements in Part 1.2 of the Code, while appropriate for unpasteurised milk (as this is the name of the food) may not provide sufficient information to the consumer to be informed about raw milk products such as cheese as the information will only be in the ingredient list.

Comments on Guide to the Requirements for Raw milk products in Standard 4.2.4 – Primary production and processing standard for dairy products.

- Suggest amending footnote to table on page 5 by deleting “Countdown 2020” so that it does not nominate a particular mastitis management program. A guidance document should not be recommending only one program as it implies that the program is the only one available that is suitable.
- Suggest for Page 12 Milking Machines – If there are specific risks for milking machines then they should be provided with control measures in the guidance document as this will assist the processor to control the risk.
- Suggest for Page 24 Monitoring criteria – that there is no explanation of why initially it would be expected that a representative sample of each raw milk tank/silo be tested prior to manufacture. The acceptable limit for *E. coli* of <100 cfu/ml is questioned, a level of 10 cfu/ml may be more appropriate if Category 2 does not allow for pathogens. The raw milk exceeding 8 degrees Celcius at any time prior to processing may not be stringent enough to protect public health and safety and provide too much leeway for the processor.
- The guidance material has suggested monitoring criteria. There is also a need to specify or clarify how corrective actions are undertaken for milk that is found to be out of specification between routine testing ie notifying raw milk product processor that pathogens may be present and they need to take appropriate action. If pre-manufacturing testing is required by the standard, this would reduce the risk of pathogens being present in the raw milk (refer to ‘No net increase in the levels of hazards given the initial level of pathogens should not be detected’ as required by the original risk assessment.)
- More information is requested to be included in the guidance document regarding what cheese types would be anticipated to meet the pH and Aw requirements For example:
 - internal ripened : hard to semi-hard (specifying which semi hard cheeses may be excluded)
 - High salt cheeses (consideration to ‘fresh’ cheeses for which there would be no maturation time as part of the processing)
 - Surface Mould ripened: *not allowed under Category 2*
 - Internal Mould ripened (specifying which semi hard cheeses may be excluded)
 - Other non-cheese products (specify butter, kefir etc as being allowed/ not allowed as Category 2)
- Suggest amending Validation of Raw Product Guideline page 5 under Initial Level of the Hazard- limit of detection (<.04 cfu per gram) should be (<.04 cfu per ml).
- Suggest amending Guide to the Requirement:

- Page12 - It is mentioned that 'For business supplying raw milk (for approved raw milk products), a more frequent servicing of milking machines and milk cooling and milk storage equipment should be implemented". Frequency should be related to manufacturer instruction and must define objectively what 'more frequent' means.
- Page 15 - Raw milk product requirements 'teats of milking animals must be clean and dry before milking'. The explanation under the statement includes 'If cleaning is necessary the teats must be washed and wiped with a single service towel'. These two statements are contradictory. Also in the same paragraph it is recommended to sanitise the teats after milking. A sanitising step before milking will be useful as well, considering high risk of contamination from teats.