

# FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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## SUBMISSION

20 August 2014

Attention: **Project Manager – P1022**

Food Standards Australia New Zealand  
Box 7186,  
Canberra BC,  
ACT, Australia, 2610.


### **Re: Primary Production & Processing Requirements for Raw Milk Products**

FTA Australia has reviewed this [Proposal](#) and endorses the following comments of the Technical Sub Committee:

The Committee does not support this Proposal as per the following points:

1. The FTAA do not want to ban raw milk cheeses by default. The hurdles should not be impractical to meet.
2. Milking larger herds, especially in a milking shed where there is milking automation, can be impractical as it is not possible to clean and dry every teat on every cow as required.
3. This does not mean that FTAA do not support practical and achievable hygienic milking procedures.
4. Increasing the cost of producing raw milk or raw milk products to the point where it is not cost effective, also means that producers are not on a 'level playing' field compared with international competitors.
5. If FSANZ does not want raw milk products then this opinion should be clearly stated.
6. It would be preferable to assess all types of cheeses on a case by case basis.
7. The risk of raw milk cheese and raw milk products is different depending on the processing undergone. For instance Standard 4.2.4 which thoroughly assesses the risk from cooked curd and thermised milk cheeses is very different to those cheeses that are not cooked and only rely on reduction in pH to be safe.
8. Regarding the microbiological requirements of raw milk products:
  - (a). Staphylococcal enterotoxins are not detectable until the coagulase positive staphylococci are present in numbers of  $\geq 10^4$ /g.
  - (b). This level would be higher than the current requirements of Standard 1.6.1, i.e. a less stringent requirement than currently required.
  - (c). The preference is for the more stringent requirements. Campylobacter should not be removed from the requirements of the Proposal.

(d)The current issue with campylobacter in poultry shows that addressing salmonella does not necessarily impact the campylobacter – especially when there is no heat applied to the process and reliance is placed in the decrease of pH and increase in the acid level.



We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Proposal](#).

Yours sincerely,

Del Teesdale– President  
Food Technology Association - Australia