

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

P O BOX 4107,
FRANKSTON HEIGHTS,
VIC 3199
TEL/FAX: 03 5971 5817
EMAIL: fta@ftaus.com.au

31 January 2010

SUBMISSION

Attention: **Project Officer P1007**
Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia, 2610.

Re: Primary Production & Processing Requirements for Raw Milk Products (Australia Only) - 1st Assessment Report

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

The Committee discussed this Proposal in detail and selected Option 2 – to amend the Code to allow for Category 1 products (as defined in this Proposal) only as the preferred position on this matter due to the following rationale:

1. Category 2 & 3 products (as defined in this Proposal) have the potential to allow the production or to encourage the growth of organisms that produce pathogens of which the safe limit is not established.
2. The controls that would be required for production of even Category 3 products, much less Category 4 products, in Australia by small companies (who are considered to be the main potential producers for these types of products) are considered to require costs and experience and expertise that may create health and safety problems to consumers unless strict adherence, inspection and enforcement is maintained to all requirements.
3. Option 2 will retain permission for the import of specified dairy products made from unpasteurised milk into Australia and permit the manufacture of a range of dairy products from pasteurized milk which are arguably equivalents in organoleptic properties when compared to similar products made from unpasteurised milk.

If there are any queries regarding this submission, please contact the Technical Secretary, Tony Zipper, Telephone (03) 9532 8213, Fax (03) 9532 8213, Mobile 0409 324 075, E-mail tzipper@dodo.com.au.

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,

Rob Richards
PRESIDENT – FTA AUSTRALIA