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Queensland Health

Enquiries to: David Larkings  
Food Safety Policy and  
Regulation Unit  
Environmental Health Branch  
Telephone: (07) 3328 9310  
Facsimile: (07) 3328 9354  
Email: [foodsafety@health.qld.gov.au](mailto:foodsafety@health.qld.gov.au)  
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14 October 2011

Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear Sir / Madam

**Submission – Proposal P1007 – Primary Production and Processing Requirements for Raw Milk Products**

Thank you for the opportunity to provide a submission on the 2<sup>nd</sup> Assessment Report for Proposal P1007.

Queensland Health has consulted with other relevant Queensland Government agencies on this proposal, including Safe Food Production Queensland and the Agriculture, Food and Tourism Group of the Department of Employment, Economic Development and Innovation. As a consequence Queensland Health, as lead agency in Queensland for coordinating policy advice relative to the national policy on food regulation, submits the following comments for Proposal P1007.

The preferred approach – Option 2 - is supported. That is, that FSANZ prepare draft variations to the current dairy processing requirements in Standard 4.2.4 of the *Australia New Zealand Food Standards Code* to allow for the production and import of raw milk products that meet the definition of category 1 products in Australia.

Furthermore, we support the proposed approach to raise a new proposal in relation to category 2 products, including the development of technical materials to support implementation and consideration of the current exemption for raw goat milk.

Regions of Queensland report to have black market sales of raw drinking milk. Microbiological tests of these products have typically identified pathogens. Other than people inadvertently exposed to raw milk products, it is possible that members of the public who become ill after consuming raw milk products purchased on the black market would not contact health service providers. Therefore, this makes it difficult to accurately estimate the number of cases of illness.

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**Office**  
Food Safety Policy & Regulation Unit  
Level 1, 15 Butterfield Street  
Herston QLD 4006

**Postal**  
PO Box 2368,  
Fortitude Valley BC QLD 4006

**Phone**  
(07) 3328 9310

**Fax**  
(07) 3328 9354