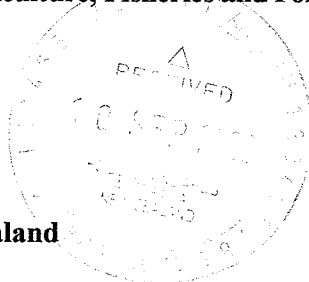




Australian Government

Department of Agriculture, Fisheries and Forestry



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**SUBMISSION TO THE
PRIMARY PRODUCTION AND PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS
DISCUSSION PAPER (PROPOSAL P1007)**

This submission by the Department of Agriculture, Fisheries and Forestry (DAFF) is in response to the FSANZ Primary Production and Processing Requirements for Raw Milk Products Discussion Paper (Proposal P1007).

DAFF is the Australian Government Department with responsibility for industries that span the food supply chain, from agriculture to food processing. DAFF jointly shares responsibility with the Department of Health and Ageing (DoHA) for food regulatory policy within the Australian Government.

DAFF supports the development of primary production and processing standards within the appropriate *Australia New Zealand Food Regulation Ministerial Council - Overarching Policy Guidelines on Primary Production and Processing Standards*. In particular, the broader policy framework states that the development of primary production and processing standards shall take into account the objectives of the COAG Food Regulation Agreement. Of these, DAFF has a specific interest in reducing the regulatory burden on the Australian food sector. DAFF supports the development of nationally applicable standards to replace current State-based provisions for raw milk products.

DAFF notes that the discussion paper does not discuss the potential costs to consumers, industry and government if there is an actual or perceived increase in the burden of foodborne illness arising from the consumption of raw milk products. The impact analysis of any proposed new framework which may allow the manufacture or import of raw milk products should take into account all potential costs and benefits to consumers, industry and government to derive the option that results in net community benefit.

DAFF also notes that the New Zealand Food Safety Authority is developing a framework for the manufacture, importation and sale of raw milk products. DAFF supports joint Australia/New Zealand efforts to harmonise food standards to ensure Australian producers will not be disadvantaged by possible New Zealand permissions for the manufacture and importation of raw milk products.

Richard Souness
General Manager
Food Regulation and Safety

8 September 2008