



**Food & Beverage  
Importers Association**

17 September 2008

Project Manager  
Food Standards Australia New Zealand  
PO Box 7186  
CANBERRA ACT 2610

Dear sir,

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

**Comments on Discussion Paper**

1. This is to comment on the Discussion Paper for Proposal P1007 – Primary Production & Processing Requirements for Raw Milk Products.
2. The Food & Beverage Importers Association (FBIA) is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia.
3. The Association strongly supports the development of a standard to accommodate raw milk cheeses. We note that specific provisions have been made in the Food Standards Code for some particular raw milk cheeses (eg Roquefort and three Swiss cheeses) that are produced in accordance with relevant government regulations and that extra hard grating cheeses are permitted. But there are other raw milk cheeses produced safely overseas, which are not permitted entry into Australia. Indeed, on the current FSANZ work plan, there are two applications for raw milk cheeses (Application A514 & Application A531), which have been on the Work Plan since February 2002. It is thus imperative to develop a standard that allows for the consumption of safe raw milk cheeses.
4. FSANZ is proposing a three category framework for examining raw milk products; the categories being set according to the effect production methods and intrinsic characteristics of the final products have on pathogen survival and growth:
  - Category 1 products are those in which the pathogens have been eliminated;
  - Category 2 covers products where pathogens may survive but do not grow;
  - Category 3 products are those where pathogens survive and grow.

**Food & Beverage Importers Association**

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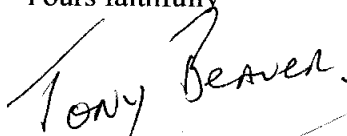
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The Association supports this framework as a sound basis for developing an appropriate standard.

5. The introduction of a raw milk standard will, in our view, necessitate a review of the microbiological standards for cheese. The current standard sets very tight limits, in particular for *E. coli*, which are out of step with international regulations. Without the setting of appropriate microbiological standards for raw milk cheeses, the development of a standard to allow a wider range of raw milk cheese products will not lead to the a wide introduction of those products if there is not a realistic standard governing microbiological limits. We request that the review of the microbiological criteria commence as soon as possible and not be delayed until after the standard has been developed.
6. Given the time already taken to reach this stage in the development process, we look forward to the speedy issue of the Assessment Report.

Please do not hesitate to contact me if you have any questions on these comments.

Yours faithfully

A handwritten signature in cursive script that reads "Tony Beaver".

A J Beaver  
Secretary