

Proposal P1022

Primary Production & Processing Requirements for Raw Milk Products

Major Procedure

Summary

NSW supports Option 1 - prepare a draft variation to Standard 4.2.4 to permit the sale of raw milk products where it can be demonstrated that the intrinsic physio-chemical characteristics of the finished product do not support the growth of pathogens and there is no net increase in pathogen levels during processing.

The Authority recognises that FSANZ has made very significant progress with P1022 and acknowledges the high quality work done in the preparation of Supporting Documents 1, 2 and 3. Most of our specific comments are relatively minor and editorial in nature. However, NSW maintains some concern around the resource and technical capacity of both regulators and the specific segment of the industry likely to pursue raw milk products to utilise the guidance materials to their full potential.

At issue is the small, non-technical nature of likely participants in the industry. For example, we see the demonstration of 'no net increase in pathogen levels during processing' as being a technically challenging exercise and beyond all but the most sophisticated participants.

Despite making excellent progress with guidance documents for use by industry and regulators, the guidance is still complex and very technical. Interpretation and application of the guidance is likely to remain a challenge for most in the artisanal sector and further work may be required to enable the guidance material to be more easily understood however it is recognised there is a practical limit to how far this can go. The subject is at its core technically complex in order to adequately address the food safety risks.

The Authority believes consistency of implementation between jurisdictions will need to be further considered. Rather than individual agencies attempting to categorise products there may be merit in establishing an expert committee to oversee the process. A similar approach was used when fermented meat regulations were initially strengthened to great success.

Specific Issues

Supporting Document 3

Section 3.6 – Demonstration through challenge studies:

The reference to Ross, 2011 has been omitted from the reference list.

Supporting Document 3

Section 4 – Conclusion:

Water activity is a critical parameter in categorising products. Paragraph 3 states that 'A default assumption when using predictive equations which include water activity is that it should be calculated from the salt concentration.' Are measured water activity values unsuitable for use with predictive equations? (Page 41)

There is a typo in the final sentence. (p42)

Supporting Document 3

Section 3 generally:

It will be challenging for industry to demonstrate that 'no net growth' has occurred during cheese manufacture. In NSW at least, it will not be easy to link a pilot cheese production facility willing and able to handle C2 (containment level 2) pathogens and a laboratory with extensive experience in challenge testing.

Even when read with Supporting Document 2, Section 3 does not readily translate into protocols for conducting the experimental work or review by the responsible authority.

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.