

Fonterra Australia Pty Ltd

ABN 52 006 483 665 ACN 006 483 665

327 Ferntree Gully Road, Mt Waverley VIC 3149

t +61 3 8541 1588, f +61 3 8541 1911

www.fonterra.com

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Food Standards Australia New Zealand (FSANZ)

submissions@foodstandards.gov.au

Dear Sir / Madam

Re: FSANZ Proposal P1022: Primary Production and Processing Requirements for Raw Milk Products

Fonterra Australia works with almost 1,300 dairy farmers and operates 10 manufacturing sites across Tasmania, Victoria and New South Wales. We collect around 20 per cent of Australia's milk from 1,300 farmers, have roughly 1800 employees and annual revenues of roughly \$2 billion per annum.

Fonterra is firmly committed to Australia and we continue to invest for long-term, sustainable growth in Australia. We have an investment of over \$1 billion of working capital in Australia and in the last three years alone, we have invested over \$100 million across Victoria and Tasmania in innovation and technology. In addition to this, in the last nine months we have purchased a stake in Bega, acquired Tamar Valley Dairy and announced a fresh milk partnership with Woolworths which will see Fonterra invest over \$30 million in a new milk plant in Cobden.

We welcome the opportunity to provide comment on the FSANZ Proposal P1022 and also the opportunity Fonterra Australia has had to input the proposed Standard as a member of the FSANZ Standards Development Committee.

Please note Fonterra supports the Dairy Australia submission on P1022.

Category 2 Products (unpasteurised dairy products made from raw milk where pathogens may be present in the raw milk but the products do not support the growth of pathogens) do present risks whereby if they are not appropriately managed the result may be serious food safety incidents. It is paramount that the Australian dairy industry reputation for safe, quality products is not compromised. While we support a risk based, category approach we do not support sale of raw drinking milk and suggest that FSANZ reconsider the exemption which allows State and Territory laws to provide for the sale of unpasteurised milk.

As per the first round of consultation, Fonterra supports a whole of supply chain approach to manage the risks. A key imperative in production of raw milk products is the skills and expertise of the people making the products and Fonterra suggests a level of expertise in relation to competency be included in the Standard.

Fonterra believes it is important that imported eligible raw milk products are subject to the same stringent requirements as local products and we suggest that the appropriate imported food scheme border actions are in place at the time the amended Standard is gazetted.

In terms of enforcement of this Standard we recognise there will be challenges for regulators but suggest through the Implementation Sub Committee for Food Regulation (ISCFR) concerted efforts are undertaken to ensure clear, helpful guidelines are put in place to support the Standard. It is critical that members of ISCFR and their regulatory colleagues take a consistent national approach to interpretation and enforcement of the Standard and supporting guidelines.

If you require further information please do not hesitate to contact me.

Yours sincerely,



Carol Bate
Regulatory Manager, Australia
Fonterra Australia Pty Ltd
327 Ferntree Gully Rd
Mt Waverley VIC 3149

