

# Dairy Authority of South Australia

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

Re: Submission on Proposal P1007: Primary Production and Processing Requirements for Raw Milk Products – 2<sup>nd</sup> Assessment Report

The Dairy Authority of South Australia (DASA) and the SA Department of Health have jointly assessed the 2<sup>nd</sup> Assessment Report for proposal P1007 and will be submitting separate submissions, covering the same observations. DASA submits the following comments:

- We support the preferred approach, including the proposed drafting of Standard 4.2.4. Specifically, we support the changes to the 'thermisation' (clause 16(1)(b)) and 'extra hard grating cheese' (clause 16(3)(a)) parameters and the consequential amendments to Standard 4.2.4.A
- We also support FSANZ progressing permissions for Category 2 raw milk products. We believe FSANZ, with the technical & regulatory assistance of ANZDAC, is best to lead this process including the development of product and performance criteria for inclusion in the Standard, as well as the necessary supporting guidance
- We support Option 4, and specifically the potential permission for Category 3 products, being ruled out altogether
- We also support the removal of the state and territory exemption for raw milk under clause 15(1) of Standard 4.2.4.
- We support the changes to the Standard taking immediate effect from the date of gazettal as there is no impact on the existing industry from the changes
- We suggest the current *Interpretive Guide for Standard 4.2.4 - Dairy Processing* be amended by FSANZ to align with the changes to the Standard
- South Australia has on-going issues with ensuring the processing requirements of the Standard are adequately assessed at the border. Our experience and concern is that it is very difficult for state authorities to assess whether an imported product, found in the domestic market, has been manufactured in accordance with the Standard.

We thank you for the opportunity to comment at the 2<sup>nd</sup> Assessment stage.

Yours sincerely

Catherine Cooper  
Chair