



19 August 2014

Project Officer Proposal P1022
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036



Dear Sir/Madam

Proposal P1022 Primary Production and Processing Requirements for Raw Milk Products – 2nd Call for Submissions Report

Thank you for the opportunity to comment on this proposal. The Ministry for Primary Industries (MPI) has the following comments to make.

Section 2.1.1 Guidance Material

In this section, FSANZ has asked for comments in relation to ‘the value in development of a predictive or other tool(s) and potential process and resources available’.

MPI believes that tools recommended for use by government agencies should be those that are freely available where possible. There is a fee for using some predictive models, which incurs an additional burden for small and artisan businesses. The tools that are available need to be simple enough for both the artisan manufacturer and enforcement agency to understand and interpret. Providing a toolkit of different predictive models and tools is one way to overcome this. The positive attributes and shortcomings will need to be clearly explained so that informed decisions can be made.

MPI has published an Information Paper titled ‘*Publications on the effect of processing on the survival of bacterial pathogens in raw milk products*’, to assist producers of raw milk products. Reference to published reports and cheese challenge studies may be useful in providing evidence of the factors that inhibit growth of pathogens during cheese production and maturation/ripening. This can be viewed on the MPI website and we suggest that this reference is added to the FSANZ Supporting Document (SD3):

<http://foodsafety.govt.nz/elibrary/industry/literature-resources-for-validation-of-raw-milk-products.pdf>

Standard 1.6.1 comments

The Call for Submissions paper and the associated documents do not contain sufficient explanation of the proposed changes to standard 1.6.1. The proposed removal of *Campylobacter*, coagulase-positive staphylococci, and coliforms, has not been sufficiently explained. The P1022 papers need to be able to stand alone, with respect to decisions that are proposed and made, in relation to the microbiological limits. There has been a general high level discussion in other FSANZ working groups about the role of food safety criteria and indicator / index organisms in standard 1.6.1, as such there has not been a clear written articulation of the principles and how these will be handled in future revisions. As such, there is not sufficient discussion on the proposal to remove indicator and index organisms from the standard.

MPI does however provisionally support the proposal in the Call for Submissions document to consolidate the food categories in standard 1.6.1 and the existing limits for unpasteurised/raw milk products (e.g. butter and raw milk cheese varieties) to a single set of limits for 'Raw milk products'. MPI supports the approach to not establish a separate microbiological limit for *L. monocytogenes* in raw milk products.

MPI agrees with the proposal to that any assessment of the current limit for *E. coli* in cheese should be addressed through a separate proposal given the scope of the review of the wider microbiological limits.

The Draft Variation at Attachment A shows the proposed limits for *Salmonella* and staphylococcal enterotoxin, in addition to *L. monocytogenes*. MPI would like clarification as to how process hygiene criteria (indicator and index microorganisms) will be applied, as the current drafting shows removal from the Code. Is it intended that all raw milk products should automatically be shown to comply with the staphylococcal enterotoxin absence requirement through specific testing or would it be acceptable for operators to only test where high levels of coagulase positive staphylococci are detected in the product?

The *New Zealand Code of Practice: Additional Measure for Raw milk Products* requires testing of product for staphylococcal enterotoxin only when a monitoring programme finds that coagulase positive staphylococci exceed 1,000cfu/g.

MPI strongly supports the proposal for the use of food safety and process hygiene criteria but the approach requires careful articulation.

Section 2.2.1.3 - Any relevant New Zealand standards


This section should include a reference to Standard 1.6.1 which applies in Australia and New Zealand.

Labelling

As noted in our submission at the 1st Call for Submissions stage, MPI recommends a Note in standard 1.2.2 or 1.2.4 (or elsewhere in the Code), reminding producers of raw milk products of the requirement to label the

name of the food and the true nature of ingredients. Labelling should not be at the discretion of producers and marketers of raw milk products, and such a Note would remove any element of uncertainty.

Yours sincerely


Manager Food Science and Risk Assessment