March 2025

Import risk review for dairy products for human consumption (the dairy review)

# Response to submissions received from the second draft report.

We received several submissions on the *Import risk review for dairy products for human consumption*: second draft report. A combined response document has been prepared as there was significant similarity between many of the questions and comments received.

## Can DAFF provide guidance to support assessments of dairy products from countries which are not free from foot-and-mouth disease (FMD)?

We have developed a fact sheet outlining the process and components of the risk assessment. This fact sheet was published alongside the dairy review and can be found [here](https://www.agriculture.gov.au/biosecurity-trade/policy/risk-analysis/animal/dairy-products-for-human-consumption).

## The heat treatments for dairy from countries which are not free from FMD are too prescriptive and may not result in a feasible commercial product.

Risk management measures proposed in the dairy review for FMD provide a baseline for adequate risk management. We will consider whether alternative treatments are equivalent to what is recommended in the dairy review for FMD risk management.

## DAFF should engage with stakeholders on the issue of repurposing imported dairy products for human consumption as animal feed.

Repurposing imported dairy products as animal feed is outside the scope of the dairy review, which only considered the animal biosecurity risks of dairy imported for human consumption. The department has conducted initial discussions with relevant stakeholders. If required, any next steps will be considered independently of the dairy review.

## Can DAFF develop import conditions for dairy products sourced from species not in scope of the dairy review?

Dairy products manufactured from milk obtained from species other than domestic cattle (*Bos taurus*), water buffalo (*Bubalis bubalis*), domestic sheep (*Ovis aries*) and/or domestic goats (*Capra hircus*) are outside the scope of the dairy review. As we have not assessed the biosecurity risk associated with milk from other species, a risk assessment would need to be conducted and appropriate conditions developed to manage risks. Assessments would need to be prioritised and may take some years to complete.

## The risk assessment for goatpox virus was extrapolated from other species and may be insufficient.

The close genetic relationship between sheeppox and goatpox viruses means that the insight gained from studying one virus can be applicable to the other. Furthermore, both sheeppox and goatpox are spread through similar transmission pathways. The potential variability in heat sensitivity between different capripoxviruses was considered when determining suitable treatments to manage the risks associated with the importation of dairy products of sheep and/or goat origin. As a result, standard high-temperature short-time (HTST) pasteurisation is not considered an approved treatment for dairy ingredients sourced from animals in countries/zones not on the sheep pox and goat pox-free country list, and only batch pasteurisation, ultra-high temperature (UHT) or equivalent thermal treatment have been approved.

Additionally, before a sheep or goat dairy product can be manufactured in, or exported from, countries not on the sheep pox and goat pox-free country list, we must conduct a risk assessment. This will determine whether the risk management measures specified in the dairy review can be met for that product. Trade would only be allowed if the risk assessment process concludes that the sheeppox and goatpox virus risks are managed to a level that meets Australia’s [ALOP](https://www.agriculture.gov.au/biosecurity-trade/policy/risk-analysis/conducting-import-risk-analysis/appropriate-level-of-protection).

## More information

[More information](https://www.agriculture.gov.au/biosecurity-trade/policy/risk-analysis/animal/dairy-products-for-human-consumption).

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**Acknowledgement of Country**

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

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