

## Comments from the Victorian Department of Health and Dairy Food Safety Victoria.

5 June 2012

The Victorian Department of Health and Dairy Food Safety Victoria welcome the opportunity to provide comments on Application A1068, a request to vary Standard 1.3.3 – Processing Aids to permit the use of hydrogen peroxide to control the population of lactic acid producing microorganisms, and in so doing, stabilise the pH during the production of dairy products manufactured using lactic acid producing microorganisms.

The Victorian Department of Health and Dairy Food Safety Victoria support the progression of the application, but would like to raise the following comments for FSANZ's consideration:

- The methods of analysis provided by the Applicant generally determine the total 'peroxides' in a product, and not just added hydrogen peroxide. For example, the peroxide value is a method designed to determine the level of oxidative rancidity in a fat or oil caused by the reaction of unsaturated free fatty acids with oxygen to form peroxides. For enforceability there would need to be a method that could effectively partition the lipid phase from the aqueous phase to enable the level of added hydrogen peroxide to be determined. This could be problematic (noting that this is not an issue with packaged water). It is requested that consideration be given to drafting the standard to require a MPL of 5 mg/kg of total peroxides expressed as hydrogen peroxide.
- There is some concern around the use of the term 'lactic acid producing microorganisms', rather than 'lactic acid producing starter culture'. This is because the term 'lactic acid producing microorganisms' does not differentiate between lactic acid bacteria that may be naturally present and those deliberately added. Hence, it would be preferable to use wording as follows:

Control of lactic acid producing *starter cultures* in order to stabilise the pH during the manufacture of –

(a) fermented milk;

(b) fermented milk products;

(c) cheese made using lactic acid producing *starter cultures*; and

(d) cheese products made using lactic acid producing *starter cultures*.