

SUBMISSION to Proposal P1022 - Primary Production & Processing Requirements for Raw Milk Products

Thank you for the opportunity to comment on Proposal P1022.

I am a **speciality cheese retailer** with more than 7 years experience in high-end food and wine retail, with a particular interest in Australian-made cheeses. I also present educational and training workshops about specialty cheese to industry professionals and members of the general public, through my own business.

In addition, I am a **Committee Member of the Australian Specialist Cheesemakers' Association (ASCA)** and a **nationally accredited cheese judge** with Dairy Australia.

Through these various roles, I deal directly with many Australian speciality cheese producers, and have a good understanding of many of the issues they face in producing, marketing, distributing and selling their products.

While I am not qualified to offer technical or scientific comment on this Proposal, I feel well placed to comment from a **consumer** and **retailer** perspective.

I commend FSANZ for amending Standard 4.2.4 to allow for the production of Category 1 products as a result of Proposal P1007 (which I previously commented on), and on its efforts to assess additional requirements for the safe production of Category 2 raw milk products in this new proposal. I also commend FSANZ for its decision not to assess the exemption in Standard 4.2.4, thereby allowing State and Territory laws to provide for the sale of unpasteurised milk.

I wish to state my support for Option 1 under Proposal P1022.

In doing so, I ask FSANZ to consider the following concerns in expanding permissions to allow for Category 2 products:

- There will likely be an immediate benefit to importers with access to raw milk cheeses produced in Europe, the USA and the UK, which may have a negative impact on the Australian speciality cheese industry (both industrial and artisanal), as it will take local producers some time to develop new products
- While Australian industrial cheese producers may have the necessary scientific and technical resources to meet validation requirements, it is unlikely that artisan producers will be able to do so without assistance

Anecdotally, I am aware that artisan producers are more likely to want to make Category 2 raw milk cheeses than industrial producers in Australia. The particular concerns of small-scale, artisanal cheesemakers – as opposed to large-scale, industrial producers and importers – should be considered in all draft variations to the Standard, to ensure that the relatively young artisan cheese industry in Australia can continue to grow, both locally and internationally.

I ask FSANZ to consider providing assistance (by way of information and resources) to ensure that artisan producers who wish to make Category 2 raw milk cheeses are not disadvantaged, relative to importers and industrial producers.

I also ask FSANZ to ensure that consideration is given to a national training program for regulators, so that specialty cheese producers in all States and Territories are monitored and assisted in a

consistent manner. Resources for wholesalers, distributors and retailers would also be beneficial, to minimise risks of post-production contamination to Category 2 cheeses.

I commend FSANZ for its decision to allow for existing generic labelling requirements in Part 1.2 of the Code to apply to Category 2 raw milk products, avoiding the need for producers, distributors and retailers to modify their existing labelling systems.

I look forward to the opportunity of providing further comment as this proposal progresses.

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