

submissions

From: Will Studd [REDACTED]
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To: submissions
Subject: P1022 - Submissions : Food Standards Notification Circular 13-14 (10 July 2014)

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TO FSANZ ,

Re: Proposal P 1022 Primary Production and Processing Requirements for Raw milk Products - July 10th 2014

I As the stakeholder in applications A 530/531, originally accepted by FSANZ in their work plan February 2004, I endorse the latest proposal P 1022 to change Primary Production and Processing Standards for Raw milk Products . These proposals are well researched and essentially represent an elaboration of Eu legislation - as originally requested . Consequently they may provide an 'equivalent 'standard to finally resolve these outstanding applications

However the proposed generic microbiological monitoring of raw milk products for *E coli* are far too strict . The purpose of the Australian Food Standards is to guarantee safe cheese. . There is no reason why **ANY** cheese made from raw milk should represent a greater degree of risk than those produced from pasteurised milk provided recognised international HACCP guidelines and equivalent appropriate food safety controls are adopted in Australia. But if the current proposals were adopted by FSANZ it would effectively prohibit the production and sale of soft , semi soft and many blue cheese types .

Furthermore the proposals make no allowance for the direct testing methodology available to differentiate toxigenic and non - toxigenic *E coli* .

It should be noted there is no legal limit for non-toxigenic *E coli* levels in raw milk cheese within the EU. *E coli* testing is used in the EU to monitor gross contamination of products, but the production of raw milk soft and semi-soft cheeses often involves long acidification times. During the acidification process, levels of non-toxigenic *E coli* may grow to detectable levels, even though the raw materials can be shown to contain <10 MPN/g *E coli*.

The U.K. Specialist Cheese makers Association advocates a target of <1000 MPN/g *E coli* in soft or slow-acidifying raw milk cheeses, but acknowledges that in certain cases even higher levels are not necessarily indicative of a hygiene lapse. Such cheeses are not made from compromised raw materials, nor do they present a risk to consumers’

Australian Consumers deserve a choice of cheese similar to their counterparts overseas . Over the past two decades, international artisan and farmhouse cheese production has enjoyed a significant growth in demand due to increasing consumer interest. Many of these cheeses are made from raw milk , but would fail to meet the current microbiological standards . The proposed Australian microbiological Food Standards review later this year needs to specifically address the higher levels of *E coli* found in raw milk cheese or the current proposals will mean very little change .

F FSA NZ , State and Territory dairy authorities , and ASCA should consider the development of a recognised National Code of Practice for the production of cheese from Raw milk in Australia . Without this technical and scientific support there is a risk many of Australia's specialist cheese makers will be unable to make raw milk cheese or achieve the potential benefits outlined in P1022

Section 2.5 FSA NZ Act Assessment Requirements 2.5.1.1. Consequently the proposals would just open the market to imported raw milk cheese from EU where the arrangements for the production of cheese from raw milk are internationally recognised by other countries , including New Zealand .



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