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To: submissions
Subject: Fw: Raw milk Cheese Choice
Attachments: image001.jpg; Will Studd Backgrounder.doc

Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

By Alison Ross Psychologist 0402 116 163 P O Box 311 Mentone Vic 3194

Overarching questions:

- 1) The overarching scope of the Proposal is assessing the safety of raw milk products using the Category Framework. FSANZ has undertaken a Technical Assessment based on three Risk Assessments (Raw Cow Milk, Raw Goat Milk and Raw Milk Cheese), a Consumer Study and Nutrition Assessment – Can you identify any aspects we have not covered at this point?

The Proposals exaggerate the risks of raw milk products.

They state that “Because of the potential for raw milk to be contaminated with pathogens, raw milk and products made from raw milk present a high level of risk to public health and safety if there are no control measures to manage the microbiological hazards that may be present.”

It is a false assumption that the risks are “high level” for raw milk products. A more realistic description for raw milk products is “they present an *additional* risk to public health and safety compared with products made from correctly pasteurised milk”.

- 2) We have summarised the impacts by option in Table 1 in the Report. Do you have any comments on the overall assessment? Can you identify other benefits and costs to the affected parties?

For raw milk cheese, the overall assessment seems to be far more alarmist than the technical assessment suggests. I consider that the technical assessment indicates that all soft cheese should be placed in Category 2, reserving Category 3 for raw drinking milk alone.

include and answer below if you wish, otherwise delete

Consumers:

- 3) Would Australian consumers benefit from a greater range of cheeses and dairy products? Please provide details.

Yes. Many of our cheeses are bland and uninteresting.

- 4) FSANZ has received comments that raw milk cheeses are likely to be gourmet, high-end market products. Costs associated with ensuring the safety of products may also be passed on to the customer - if raw milk cheeses were permitted:

- a. How much would you be willing to pay for such cheeses?

\$70.00 pkilo

- b. Are you willing to pay more than the cost of current gourmet cheeses?

CHEESE CHOICE & THE FUTURE OF RAW MILK IN AUSTRALIA

Food Standards Australia New Zealand (FSANZ) is seeking public comment on its recently released proposals (P1007) to change Australian Food Standards for cheese in Australia

The **GOOD news** is that if these proposals are adopted they will enable the production and sale of raw milk cheeses in Category 1 and 2, as described in the FSANZ Discussion paper in August 2008.

BUT

The **BAD news** is that the proposals are very limited and cheeses made from raw milk in category 3, and raw drinking milk will continue to be banned.

It has been 14 years since the Australian authorities introduced a national ban on most types of cheese made from raw milk and raw drinking milk.

Since then FSANZ have granted only very minor concessions to imported hard cooked cheese types, and Roquefort after international trade threats and embarrassing media coverage.

Over six years ago, FSANZ agreed to review our application (A530/531) for a change to allow the production and sale of raw milk cheese, and an application for raw drinking milk.

The delay and past outcomes suggest it is unlikely the latest proposals will change much through rational debate, public submissions or scientific argument. But if these proposals are adopted without a challenge it will be years before there is an opportunity for another review.

Over the past two decades, international artisan and farmhouse cheese production has enjoyed significant growth in demand due to a revolution in consumer interest. Many of these cheeses are made from raw milk and are recognised as having an infinitely superior flavour and authentic regional character when compared to similar cheeses made from pasteurised milk. FSANZ has refused to recognise this trend and these proposals will continue to restrict the types of cheese that can be produced and sold in Australia.

FSANZ are obligated to seek public consultation by regulation on all proposed changes to the Food Standards.

If you think Australian consumers and Australian cheese makers deserve the opportunity to enjoy a complete range of raw milk cheese you can help by making a submission to FSANZ by February 24th

<http://www.foodstandards.gov.au/foodstandards/changingthecode/documentsforpublico868.cfm>.

And sign up to the petition at

<http://slowfoodaustralia.com.au/projects/australia/raw-milk-cheese/>

Background information to the FSANZ raw milk analysis can also be found on the website www.foodstandards.gov.au/thecode/primaryproductionprocessingstandards/

GOOD REASONS TO OBJECT

1. Australian artisanal cheese makers should not be restricted to the production of Category 1 and 2 cheeses. Over the past two decades, international artisan and farmhouse cheese production has enjoyed a significant growth in demand due to a revolution in consumer interest. Many of these are category 3 cheeses made from raw milk, and are recognised as having an infinitely superior flavour and authentic regional character when compared to similar cheeses made from pasteurised milk.
2. The purpose of the Australian Food Standards is to guarantee safe cheese – however the assumptions made in these proposals exaggerate the risks. 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 are adopted in Australia.
3. Australian Consumers deserve a choice similar to their counterparts overseas and products outlined in category 3 should apply only to raw drinking milk.
4. The proposals do not encourage world best practice in cheese or milk production and fail to take into account the difference between the quality of 'open ' market milk and the controls on milk quality on the farm for raw milk cheese .
5. The proposals do not address changes to Australian microbiological food Standards which are currently out of step with scientific studies and standards applied in overseas countries.
6. The proposals are anticompetitive and represent a breach of Australia's commitment to WTO:
 - WTO Article 5.1 requires members to 'ensure that their sanitary or phytosanitary measures are based on an assessment, as appropriate to the circumstance, of the risks to human, animal or plant life or health, taking into account risk assessment techniques developed by the relevant international organizations'.
 - Article 5.2 states in the assessment of risks 'Members shall take into account available scientific evidence'.
 - Article 5.4 states 'Members should, when determining the appropriate level of sanitary or phytosanitary protection, take into account the objective of minimizing trade effects'.
7. The proposals are overly prescriptive and do not meet the Council of Australian Government (COAG) guidelines on primary production and processing standards that stipulate an objective of minimal effective regulation