

**Seamons, Colleen**

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**From:** Laurie Gutteridge [laurie@tastecheese.com.au]  
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**To:** submissions  
**Subject:** SUBMISSION - P1007 - Primary Production & Processing Requirements for Raw Milk Products

**Categories:** Blue Category

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

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**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. The technical assessment indicates that all soft cheese should be placed in Category 2, reserving Category 3 for raw drinking milk alone.

FSANZ should provide information or data on current production and processing practices that can help further detail Category parameters and inform how identified control measures could work in practice. For fermented products such as cheese, the effect of a competing microflora (The Jameson Effect) needs to be considered.

In regard to the Technical Assessment, FSANZ should provide further information or data that can be taken into account when determining the risks associated with each of the three Categories. The following two publications provide good evidence for the safety of raw milk cheeses.

European Commission Co-ordinated Programme for the Official Control of Foodstuffs for 2005: *Microbiological Examination of Cheeses made from Pasteurised Milk from Production Establishments and Retail Premises in the United Kingdom* CL Little<sup>1\*</sup>, J Harris<sup>1</sup>, SK Sagoo<sup>1</sup>, M Greenwood<sup>2</sup> V Mithani<sup>1</sup>, K Grant<sup>1</sup>, J McLauchlin<sup>1</sup> and the Food, Water and Environmental Surveillance Network<sup>†</sup>.

and, European Commission Co-ordinated Programme for the Official Control of Foodstuffs for 2004: *Microbiological Examination of Cheeses made from Raw or Thermised Milk from Production Establishments and Retail Premises in the United Kingdom* CL Little<sup>1\*</sup>, JR Rhoades<sup>1</sup>, SK Sagoo<sup>1</sup>, M Greenwood<sup>2</sup> V Mithani<sup>1</sup>, K Grant<sup>1</sup>, J McLauchlin<sup>1</sup> and the Food, Water and Environmental Surveillance Network<sup>†</sup>.

FSANZ need to recommend what support materials or systems be in place to help producers and processors make safe products. These should recognise:

- (a) The commercial relationship between the milk producer and the cheesemaker is a vital link in assuring raw milk safety.
- (b) Farmer quality payment systems should include pathogen surveillance. Both aspects would benefit from a government training initiative.

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.

Australian Consumers deserve a choice similar to their counterparts overseas.

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.

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 .

The proposals do not address changes to Australian microbiological food Standards which are currently out of step with scientific studies and standards applied overseas.

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'.

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.

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

I believe that Australian consumers would benefit from a greater range of cheeses and dairy products. A greater range means greater competition, both in price and quality. The current range of cheeses available in Australia is very small, as a result of restrictive food safety laws and lack of innovation. As a working cheesemonger every day I experience the desire and interest of Australian consumers to try more unusual, interesting and unique cheeses. The ability to improve the quality and variety of Australian made cheeses, as well as making more benchmark European cheeses available in Australia is vital to the development and growth of this specialised industry. It is ridiculous and outrageous that real cheddar, made on the farm in England, is illegal in Australia. I doubt many consumers are aware of this absurd fact.

**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?**

I would be willing to pay as much as it takes. From my daily experience as a retail cheesemonger, I am confident that both myself and my customers would be willing to pay as much as it takes, as long as we can perceive the benefit of buying the product – by being able to taste a difference and by being able to hear the story and to be explained a justification for the pricing. We already successfully retail cheeses at as much as \$150/kg. Some cheeses sold by the unit would work out at even more, a 200g cheese was retailing at \$35 recently.

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

Again, if I, or my customers can perceive a benefit, a difference and understand the reason, then yes. It is vital to have passionate retailers that understand the producers that they are representing, and that can demonstrate the difference and uniqueness between farmhouse or artisan cheeses and their industrial counterparts.

**c. Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?**

Absolutely. Making raw milk cheese is vital to the development of the Australian specialty cheese industry.

**d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent?**

I purchase based on quality. There are currently a handful of producers in Australia who are making cheese of an equivalent quality to their European counterparts, and whose product I am happy to put in my retail counter. I am desperate to find Australian cheesemakers who are thinking outside of the box and who are making cheeses with character, individuality and

uniqueness. I think it is obscene in this day and age that we should be having to import cheese from the other side of the world.

In answer to the question, it is not about choosing to purchase one over the other due to patriotism, it is about purchasing the cheese with the most character, flavour, quality and sustainability. That final term is vital, and would result in me choosing to purchase Australian cheeses over imported equivalents (because by definition importing any product halfway around the world is unsustainable) as long as the other terms are met.