

## Seamons, Colleen

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**From:** Sonia Cousins [soniacousins@optusnet.com.au]  
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**Subject:** SUBMISSION - Proposal P1007 - Primary Production & Processing Requirements for Raw Milk Products

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### **SUBMISSION - Proposal P1007 - Primary Production & Processing Requirements for Raw Milk Products**

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Thank you for the opportunity to comment on the First Assessment Report, released in December 2009. I commend FSANZ on its work so far, but believe the proposed reforms will not go far enough.

I am a cheese specialist currently employed at *Formaggi Ocello*, one of Sydney's few remaining dedicated cheese retailers. Prior to this, I was the Manager at *GPO Cheese & Wine Room*, Sydney's premier cheese & wine dining venue. For the past 3 years, I have also acted in an honorary capacity as a cheese judge at major national and international cheese shows, including the Sydney Royal Cheese & Dairy Produce Show (2008, 2009, 2010), Australian Speciality Cheesemakers Association show (2009, 2010) and the World Cheese Awards (run by the British Guild of Fine Food, 2009).

My profession as a cheese retailer gives me exposure to a wide range of speciality Australian and European cheeses, and I am passionate about championing the best Australian artisan dairy products with consumers.

In summary, I urge FSANZ to bring Australia into line with other major cheese-producing nations and allow the commercial production and sale of all types of cheeses made from raw milk.

#### **Response to "Overarching Questions"**

- *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?*

Regarding the **Consumer Study**, I do not believe it adequately assessed issues associated with raw milk **cheese**. It appears that the consumer assessment focussed solely on a very small number of participants who already consume raw milk. While this information is obviously of value to a small aspect of the current review, it does not appear to provide any assessment of consumers' knowledge of raw milk cheeses, and is therefore very limited. Also, I am surprised that there does not appear to have been any assessment of the actual health & safety consequences of the consumption of raw milk by those participants.

Further, given that Roquefort has been consumed in Australia for several years since the ban was lifted (and for many years prior to this), does FSANZ have data regarding public health & safety issues regarding the actual consumption of Roquefort cheese? Have consumers who buy and eat Roquefort been asked about their perceptions and/or health consequences? Speciality cheesemongers who sell Roquefort cheese on a daily basis could certainly help to provide willing participants for such a consumer study. I

would be happy to assist FSANZ to identify an appropriate sample group of Roquefort consumers to be surveyed during the 2<sup>nd</sup> Assessment stage.

Regarding **other aspects that have not been covered**, it appears that there has been no analysis of food safety issues associated with raw milk cheese consumption in other major, western cheese-producing nations.

Has FSANZ considered data from both the United States and Britain in regard to the production and sale of raw milk cheese? Both countries now allow the local production and importation of raw milk cheeses, and should have recent data showing any resulting impacts on consumer health. Given the common societies, cultures & values, and food safety standards, shared by Australia with these countries, there should be much to extrapolate. Are there data showing consumer perceptions about raw milk cheeses in these countries? Are there data reporting on health and safety issues associated with raw milk cheese consumption? If so, is there concrete evidence that consumers in Britain and the United States have been contaminated by pathogens as a direct result of consuming raw milk cheeses produced in those countries?

- *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?*

Regarding the **category framework**, I object to the inclusion of both milk and cheese in Category 3. The **Microbiological Risk Profile (Part A)** states that “*Overseas data demonstrates that pathogens are frequently isolated from raw milk and raw milk products. Pathogens were detected in raw milk in 85% of 126 surveys identified in the literature. In surveys of raw milk cheese pathogens were rarely detected.*” This clearly demonstrates that while raw milk is justifiably classified as a “high risk” food, it is unreasonable to categorise raw milk cheese as high risk, as “*pathogens were rarely detected*”. Further, the **Dairy Risk Profile** report that forms part of the Proposal again emphasises the differences in risk between raw drinking milk, and various other dairy products, even acknowledging that soft cheeses and some types of fresh cheeses that experience high pH levels during the cheesemaking process, pose a “low relative risk” to public health.

Also, the production, packaging, handling and shelf-life requirements for fresh drinking milk and the types of cheeses currently included in Category 3 are vastly different, and any assessment of the perceived risks involved should consider those differences.

I therefore urge FSANZ to either create a 4<sup>th</sup> category for raw drinking milk, or reclassify soft ripened cheeses, fresh & mould ripened goat’s cheeses, and blue cheeses into Category 2.

### **Comments on “Industry” questions**

I believe that FSANZ should consider specialist cheese retailers as a distinct group of professionals within the Industry category. The “retail” sector is too broad to include all types of cheese retailers together. There is an enormous difference between an unskilled sales assistant in the deli section of a large supermarket, and an experienced cheese professional in a specialty cheese store.

Would FSANZ consider including speciality cheese retailers in the next round of consultation activities, in a similar way to the on-site consultation that took place with speciality cheese manufacturers during the 1<sup>st</sup> Assessment Stage? I would be happy to assist if an appropriate opportunity arises.

### **Response to “Consumer” questions**

Over the past 5 years working in a food retail environment, I have observed a steady increase in consumer interest in artisan cheeses. Since the lifting of the ban on Roquefort cheese several years ago, I receive weekly requests from customers for other raw milk cheeses; most customers are surprised to learn that local producers are prohibited from making any kind of cheese from raw milk, and that imports are still limited to the “hard-cooked” varieties and Roquefort.

Questions surrounding consumer awareness and consumer education further highlight the importance of speciality cheese retailers who employ properly trained staff, and who are able to provide accurate information to customers who want to purchase raw milk cheeses. There is an enormous difference between a consumer selecting a pre-packaged cheese from a supermarket shelf (where little attention may be paid to labels) and purchasing a cheese from a speciality cheesemonger, where discussion and

interaction can take place. I would hope that any consideration of consumer perceptions undertaken by FSANZ in the next Assessment Stage differentiates between cheeses stacked and sold *en mass* in a supermarket fridge, from those displayed and sold with knowledge and care by specialists who are able to educate consumers.

I firmly believe that many consumers are well-informed about raw milk cheeses, and that they want to buy them. Educated consumers already appreciate the differences in quality and price between a factory-produced, industrial cheese and a hand-made speciality cheese produced on a small farm. These consumers will therefore have no difficulty appreciating the reasons for possible higher prices – due to more detailed production, handling and labelling requirements, as well as their possibly limited availability – of cheeses made from raw milk.

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

Yes! The most obvious benefit to consumers if production of raw milk cheese is allowed in Australia will be cheeses with more **flavour**. I will give one specific example. If ever there were a case for the use of raw milk to create cheeses with greater depth of flavour, and expression of regional character, it is with the Australian white mould cheeses. My experience as a retailer and judge has shown me that most Australian white mould cheeses taste the same – at best like soft butter, and at worst like wet cardboard. It is extremely rare to find Australian white mould cheeses with the authentic earthy, mushroomy flavours found in their French counterparts. The pasteurisation process effectively “standardises” the milk, resulting in cheeses with no potential to express the regional flavours and characters of the milk used to make them, nor of the environment in which they were matured. Australia’s talented artisan cheesemakers are prevented from developing their own distinctive style in the traditional sense, and cheeselovers are unable to appreciate the intricacies and subtleties of region and season.

- *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:*
  - *How much would you be willing to pay for such cheeses?*
  - *Are you willing to pay more than the cost of current gourmet cheeses?*
  - *Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?*
  - *Would you choose to purchase an Australian raw milk cheese over an imported equivalent?*

Yes! If the Australian cheese is of equivalent quality and flavour, I would certainly choose it over an imported counterpart. Price would not be a major consideration.

Yes, I am prepared to pay more for Australian cheese made from raw milk. However, I must question how FSANZ defines “gourmet”. Does this mean King Island Black Label Double Brie – considered to be a “gourmet” cheese by many consumers because it is not available in supermarkets like other King Island cheeses, and is reported to be produced using artisan methods – with an average price of around \$60 per kg in Sydney? Or would a cheese such as Holy Goat La Luna be classified as “gourmet” – produced entirely by hand on a farmhouse scale, using only organic goat’s milk from the cheesemakers’ own herd of goats – with an average price of around \$140 per kg in Sydney?

Yes, I am willing to pay more than \$60 per kg for quality cheese, and I would have no hesitation paying more than \$140 per kg for an exceptional cheese made from raw milk.

I would also comment that I am surprised so much emphasis is being placed on the issue of price. My understanding is that FSANZ’s primary concern is for public health and safety, and not on the cost of goods. Given that the Proposal is titled “Primary Production and Processing Requirements for Raw Milk Products”, and that the “*overarching scope of the Proposal is assessing the safety of raw milk products*”, I wonder why the end-price is being considered at all.

### **One final comment**

While judging at the World Cheese Awards in October 2009, I attended several seminars where the issue of raw milk cheese was raised. Industry leaders from the United States, Britain, South Africa and several European countries discussed the use of raw milk in their respective countries, and in all cases when Australia was mentioned, the implication was that we were “behind the times”. Surely we should be looking to countries such as the USA and Britain – countries which share similarly high standards of food production and food safety as Australia – as examples of how raw milk cheese can be successfully and safely produced, packaged, sold and consumed?

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