

Seamons, Colleen

From: Grace [grace_l@iprimus.com.au]
Sent: Sunday, 21 February 2010 7:23 PM
To: submissions
Subject: First Assessment of Proposal P 1007

Re First Assessment of Proposal P 1007 Primary Production & Processing Requirements for Raw Milk Products (Australia only)

I would like to register my submission on the first assessment of this proposal:

1. The option being considered does not encourage world best practice in cheese-milk production and allows the use of milk of poor microbiological quality for cheese-making. There is no reason why cheese made from raw milk should represent a greater degree of risk than those produced from pasteurised milk provided recognised international guidelines for milk of good microbiological quality are adopted in Australia.
2. There is no evidence of sufficient quality to support the option to remove the phrase “unless an applicable law of State or Territory otherwise expressly provides” to be removed from Standard 4.2.4. Currently approved producers of raw milk in some states produce raw milk using specific production and processing controls that reduce risk to an acceptable level.
3. The nutritional value of raw milk compared to nutritional value of pasteurised milk was not covered and the statement made in the assessment at 7.2.5 “Pasteurisation does not impact on the nutritional importance of milk products in the Australian diet.” was not relevant nor supported by evidence of sufficient quality.
4. The microbiological standards for cheese are overly onerous in relation to e coli. The standard is out of step with scientific studies and the microbiological standards applied in other countries.
5. The Standard is overly prescriptive. It does not meet the Council of Australian Government (COAG) guidelines on primary production and processing standards that stipulate an objective of minimal effective regulation.
6. 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 made from raw milk and are recognized as having an infinitely superior flavour and regional character when compared to similar cheeses made from pasteurised milk. However unlike their counterparts overseas, Australian consumers have been denied a choice of cheeses made from raw milk.
7. Consumers would benefit from a greater range of cheeses and dairy products. I would pay any amount in order to buy good quality raw drinking milk and raw milk cheese, to cover the cost of ensuring the safety of raw milk products, more than the cost of current gourmet cheeses. I would choose to purchase an Australian raw milk cheese over an imported cheese if it were of equal quality/flavour. I would pay to know where the milk was from, what the animals had been fed, thus how the cheese got its flavour.
8. The option being considered does not give the consumer the option to choose to but a young raw milk cheese made anywhere in the world. These cheeses are being consumed in most countries of the world and consumers in Australia should be allowed the same choice.

Signed Lynda Grace

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