

Seamons, Colleen

From: Meyer-Witting Martina [mmwmedic@bigpond.net.au]
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Subject: Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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

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I think Australian consumers and Australian cheese makers deserve the opportunity to enjoy a complete range of raw milk cheese.

I would be prepared to purchase raw milk cheese whatever the cost, purchasing Australian cheese in preference to an imported equivalent.

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

Thank you for your consideration.

Martina Meyer-Witting