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To whom it may concern,

My name is Lachlan King and I am a beef producer in Violet Town, Victoria (near Shepparton). I am interested in producing raw milk cheeses with my Australian-French wife. My wife and I are Primary Producers with recognised training in Agricultural Science and Law, and Accounting and Retail Operations respectively.

As you may be aware, Food Standards Australia and New Zealand (FSANZ) is currently seeking public comment on the second assessment report recommending permission for non-pasteurized hard to very hard cook curd cheeses but has not included any other cheeses in this proposal.

My wife and I would like to produce raw milk soft cheeses in the near future but I understand under the current proposal this would not be possible. It concerns me that Australian producers are being unfairly discriminated against despite international evidence to suggest that raw milk cheese produced under strict standards are no greater threat to human health than many foods currently available for consumption.

The following information delineates my objections to [Proposal P1007](#) –**Primary Production & Processing Requirements for Raw Milk Products** as it currently stands:

1. Australian artisanal cheese makers should not be restricted to the production of Category 1 cheeses. Over the past two decades, international artisan cheese production has enjoyed a 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.
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. The proposals do not recognise the changes adopted by the New Zealand Food Safety Authority which recognise EU standards on raw milk cheese, and allow the production and sale of raw milk cheese in New Zealand.
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 are anticompetitive and represent a breach of Australia's commitment to the World Trade Organisation (WTO):

- a. 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”.
 - b. Article 5.2 states in the assessment of risks “Members shall take into account available scientific evidence”.
 - c. 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”.
6. 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.

Please accord our opinions due diligence in the review of the legislation.

Yours sincerely,

Lachlan & Sarah King