Seamons, Colleen

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Sent:	Friday, 29 August 2008 8:13 PM
To:	submissions
Subject:	Re: Proposal P1007 Primary Production and Processing Requirements for Raw Milk Products
Follow Up Flag:	Follow up
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Re: Proposal P1007 Primary Production & Processing Requirements for Raw Milk Products (Australia only)

I would like to register my support for an amendment to the code to bring Australia into line with other major international cheese manufacturing countries.

My objections to the current standards that prohibit the production and sale of most cheese made from raw milk in Australia are as follows:

1. The purpose of the Standard is to guarantee safe cheese ? however the assumption that pasteurisation as a single step will guarantee safety is not scientifically valid.

2. The single critical control point that guarantees safety for all cheese varieties is starter culture activity that creates a hostile environment to pathogens in the cheese. Starter culture activity comprises two biological components, the first is primary fermentation of milk sugar to organic acids during cheese making and the second is secondary fermentation/metabolism of organic acids, fat and protein during ripening. This principal is supported by scientific studies and accepted by all of the major cheese producing countries of the world i.e. European Union (EU), USA, and Canada.

3. The standard is anti-competitive and trade restrictive. The standard does not encourage world best practice in cheese/milk production and allows the use of milk of poor microbiological quality for cheese making.

4. The microbiological standards for cheese are overly onerous in relation to E.coli and have led to very questionable practices in domestic production. The standard is out of step with scientific studies and the microbiological standards applied in overseas countries.

5. The standard is a breach of Australia?s commitment to WTO Policy, as it cannot be justified on scientific grounds for food safety.

    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'.

6. 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.

7. The standard is highly discriminatory. It provides for international exemptions such as Roquefort and Swiss cheese but denies Australian cheese makers a choice of making similar cheese from raw milk. Australian artisanal cheese makers deserve to have the opportunity to develop a significant point of difference to enable their products to survive in a competitive market.

8.   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 cheeses are made from raw milk and are recognised as having an infinitely superior flavour and regional character when compared to similar cheeses made from pasteurised milk. However unlike their overseas counterparts Australian consumers have been denied a choice of cheeses made from raw milk.

9.   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 are adopted in Australia.

Signed
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