

Seamons, Colleen

From: Lucia Perera [Lucia.Perera@melbourne.vic.gov.au]
Sent: Wednesday, 10 September 2008 3:42 PM
To: submissions
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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.

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