

30th of August, 2008

Food Standards Australia New Zealand
P.O. Box 7186
Canberra BC. ACT. 2610

RE: Proposal P1007: Primary Production & Processing Requirements for Raw Milk Products

I would like to declare my support for an amendment to the code that would 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 stated below:

1. Although the purpose of the Standard is to guarantee safe cheese, pasteurisation will not guarantee the safety of cheese *per se*. The critical control point that ensures safety 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; the second is secondary fermentation/metabolism of organic acids, fat and protein during ripening. This principle is supported by scientific studies and *accepted by all of the major cheese producing countries of the world - the European Union (EU), USA, and Canada*. These countries, it must be admitted, have a *very long history in the manufacture and safe consumption of cheese* and are thus in a position to objectively evaluate such risks.
2. 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.
3. The standard does not encourage world best practice in cheese/milk production and allows the use of milk of poor chemical and microbiological quality for cheese making.
4. The standard appears highly discriminatory. It provides for international exemptions such as Roquefort and Swiss cheese, but denies talented Australian cheesemakers the choice of making similar cheeses from raw milk.
5. 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. 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!

6. The Standard is overly prescriptive. It does not appear to comply with 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 anti-competitive and restricts trade potential.
8. The standard is actually 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'.

Thank you for your time and consideration.

Yours sincerely,

Lydia Coleborn.