

Seamons, Colleen

From: Serafini Family [serafini10@netspace.net.au]
Sent: Tuesday, 16 September 2008 7:59 PM
To: submissions
Subject: submission

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RE: Proposal P1007 Primary Production & Processing Requirements for Raw Milk Products
>
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>
> 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 : Pauline Serafini
> 31 Warncliffe Rd.,
> East Ivanhoe. 3097 Victoria
> Phone: 94995032

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