

**From:** Accounts at NFM [accounts@fertility.com.au]  
**Sent:** Wednesday, 10 February 2010 2:39 PM  
**To:** submissions  
**Subject:** proposals (P1007) to change Australian Food Standards for cheese in Australia

**Categories:** Blue Category

Australian artisanal cheese makers should not be restricted to the production of Category 1 and 2 cheeses. 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 are category 3 cheeses 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.

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.

Australian Consumers deserve a choice similar to their counterparts overseas and products outlined in category 3 should apply only to raw drinking milk.

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 .

The proposals do not address changes to Australian microbiological food Standards which are currently out of step with scientific studies and standards applied in overseas countries.

The proposals are anticompetitive and represent a breach of Australia's commitment to WTO:

- 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'.

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

**Jo Morgan**  
Accounts

Natural Fertility Management Pty Ltd  
[accounts@fertility.com.au](mailto:accounts@fertility.com.au)  
<http://www.fertility.com.au>  
Ph: 61 2 9268 9000 Fax: 61 2 9267 6377  
Suite A Level 6 204 Clarence Street Sydney NSW 2000

---

**This information contained in this email is privileged and confidential.**

*If you are not the intended recipient, you are hereby notified that any use, review, dissemination, distribution or copying of the contents of this communication is strictly prohibited. If you have received this communication in error please notify us immediately and destroy the original message. Any opinions or views expressed in this message are those of the individual sender and may not represent those of their employer. Additionally, the sender cannot accept liability for any virus damage caused by this message.*

---