

**SUBMISSION FROM REBECCA ROZENCWAJG  
REGARDING: PROPOSAL P1007, 2<sup>nd</sup> ASSESSMENT REPORT**

**PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS**

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As a consumer and a proud professional working within the cheese industry, I have a genuine interest in ensuring Australia's cheese (and more broadly dairy) industry is recognised as being world class, in quality, variety and competitiveness.

I therefore offer the following comments in response to Food Standards Australia New Zealand (FSANZ) 2<sup>nd</sup> Assessment Report on Proposal P1007, which assesses the current restrictions on the production and processing of raw milk products in Australia.

**Shortcomings of the Proposed Variation to Standard 4.2.4**

I welcome the proposed changes to the Australia New Zealand Food Standards Code - Standard 4.2.4, in order to allow for processing of products that meet the definition of 'Category 1'<sup>1</sup> under proposal P1007. However, I feel that FSANZ has not truly met its primary objective of 'enabling a greater range of dairy products to be produced in, or imported into Australia'. While the changes proposed are a small step in the right direction, they will in reality mean only minor changes to the current regulations on milk heat treatment, maturation time and moisture content, and will not foster substantial growth in the range of products produced in, or imported into Australia.

While I understand that FSANZ now plans to progress a separate new Proposal to assess processing requirements of 'Category 2'<sup>2</sup> products, it must be noted that it is very disappointing that the scope of Proposal P1007 was limited to Category 1 products in the 2<sup>nd</sup> Assessment Report.

The 1st Assessment Report, delivered in December 2009, stated its 'preferred approach' as:

*"To amend the current dairy processing requirements in the Code to allow for the production and import of raw milk products that meet the definition of Category 1 and 2 products into Australia (Option 3)."*

I am disappointed that FSANZ has not managed to make more significant progress in the assessment work carried out since the 1st Assessment Report was delivered almost two years ago.

Furthermore, by limiting the scope of Proposal P1007, FSANZ has failed to provide a framework that would enable domestic producers to compete fairly with international producers. A prime example of this inequality in regulation is

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<sup>1</sup> Category 1 products are defined as those products for which the properties or processing factors eliminate pathogens that may have been present in the raw milk (eg non-pasteurised hard to very hard cheeses; Gruyere, Sbrinz or Emmental cheese)

<sup>2</sup> Category 2 products are defined as those products for which the properties or processing factors may allow the survival of pathogens that may have been present in the raw milk but do not support the growth of these pathogens (e.g. raw milk semi hard cheeses, cheddar, blue cheese)

Roquefort, which is allowed to be imported into Australia, yet Australian producers are unable to emulate it. I feel this is a failure of Section 18 of the FSANZ Act which calls for FSANZ to have regard to 'the promotion of consistency between domestic and international food standards' and 'the desirability of an efficient and internationally competitive food industry' when developing and varying food regulatory measures.

### **Satisfying Consumer Demand and Achieving International Consistency**

I note that 87% of respondents to the 1<sup>st</sup> Assessment were consumers, primarily interested in the production and purchase of raw milk cheese. This high proportion of respondents shows that there is significant support for changes to existing regulations. Over the past few years, Australian consumers have become more discerning, as the quality, range and access to food products in general has increased. The specialty cheese market has enjoyed a significant growth in demand due to this revolution in consumer interest.

My passion for specialty cheese has led me to seek out the very best cheeses I can find, both in Australia and during extensive overseas travel. I wholeheartedly believe that cheeses made from raw milk embody authentic regional characteristics and superior flavour when compared to similar cheeses made from pasteurised milk. Australian consumers should have the right to choose from a greater variety of raw milk cheeses like those already produced overseas, provided they are of high quality and meet regulatory standards. Furthermore, our local producers should also have the ability to produce raw milk cheeses, made within regulatory guidelines, in order to meet increased local consumer demand and to increase our dairy industry's ability to compete on the world stage.

The proposed changes to Standard 4.2.4 detailed in the 2<sup>nd</sup> Assessment Report do not allow for consistency with the production and import regulations of many other countries. In particular Australia should look to align our regulations on this issue with the changes recently adopted in New Zealand, with whom we share other food safety standards.

### **The New Proposal to Focus on Category 2 Cheeses**

I welcome FSANZ decision to continue to work on regulatory changes to permit further raw milk products to be produced locally and imported into Australia. I urge FSANZ to publicly detail the studies and assessment surrounding Category 2 products that have been undertaken thus far.

I also note that only one member of the Standard Development Committee (SDC) for Proposal P1007 represented consumers, which was disproportionate to the amount of consumer interest in this issue. I call on FSANZ to include a greater consumer presence on the SDC when considering this future Proposal on Category 2 products. I would be happy to participate as a member of this Committee.