

**Seamons, Colleen**

---

**From:** michael.zeitoun@flaktwoods.com  
**Sent:** Thursday, 11 September 2008 5:07 PM  
**To:** submissions  
**Follow Up Flag:** Follow up  
**Flag Status:** Blue

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 \u2013 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\u2019s 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.
- >
- >

Michael Zeitoun

183 Alma Road  
St Kilda Victoria  
Australia

Michael Zeitoun  
General Manager  
FlaktWoods Fans Australia Pty Ltd  
Tel 03 9248 8500  
Fax 03 9248 8686  
michael.zeitoun@flaktwoods.com

=====

The information contained in this e-mail is confidential and is intended only for the use of the addressee(s). If you receive this e-mail in error, any use, distribution or copying of this e-mail is not permitted. You are requested to forward unwanted e-mail and address any problems to IT Support, Flakt Woods Fans (Australia) Pty Ltd.

For general enquires phone: +61 (0)3 9248 8500  
Support Centre E-mail: fans.au@flaktwoods.com

=====