

Submission

Re: proposal P1007 Primary Production and processing Requirements for Raw Milk Products (Australia only)

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Position: Company Directors

Company: Sutton Grange Organic Farm

Product: Holy Goat Cheese

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We would like to register our support for an amendment to the code to bring Australia into line with other international cheese manufacturing countries.

Our objections to the current standards that prohibit the production of 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. We are producers of goats milk cheese.
 - a. We have a closed system and only source milk from our organically certified milking goats. We produce cheese every day from the collection of milk from the previous night and the morning of cheese production.
 - b. We only use milk from healthy goats – no signs of ill health or mastitis. At each milking, milk quality is checked via collection of a small sample of milk from each goat prior to applying the milking cups.
 - c. Currently all our milk is pasteurised within 1 hour of milking in a batch pasteuriser at 63C for 30 minutes.
3. We propose that the Standard consider the scientific evidence for the capacity of starter culture activity to guarantee the establishment of a hostile environment to pathogens in cheese.
 - a. In our case immediate application of lactic acid starter cultures to the night and morning milk can be demonstrated to effectively provide a single critical control point that guarantees safety from pathogens in our cheese production. All of our milk undergoes a 20 to 24 hour lactic acid fermentation. This produces curd with a PH of 4.5 to 4.7. It is our position that this lactic acid fermentation process should be the single critical control point for our cheese production. This principal is supported by scientific studies and accepted by all major cheese producing countries ie European Union, USA and Canada.

- b. FSANZ needs to consider aspects of acidity levels to control pathogens in raw milk cheese. We have high moisture, low acidity cheese that does not fit the parameter of low moisture, 60 to 90 days maturing typically applied to hard cheeses.
 - c. We suggest that Dairy Food Safety work in partnership with us to test the efficacy of lactic acid fermentation as the single critical control point in our production system (closed herd, daily cheese production, capacity to immediately inoculate milk with lactic acid starter). Dairy Food Safety Victoria (DFSV) have the capacity and expertise to apply for funding to support such a trial. It is important DFSV show leadership to support artisanal cheese producers, who have no capacity to undertake such a trial in their own right. It is important to allow Australian data to be gathered that substantiates the scientific evidence that exists in the European Union, USA and Canada.
 - d. The UK Specialist Cheese Makers Code of Best Practice 2007, Appendix 3, provides recommended Microbiological Standards for Cheese both raw and unpasteurised. We recommend that these standards are adopted by FSANZ. The current FSANZ microbiological standards for cheese are overtly onerous in relation to E. coli. The standard is out of step with scientific studies and the microbiological standards applied in overseas countries.
 - e. The current Standard is anti-competitive as it does not allow world best practice for Australian artisanal cheese makers. The standard is highly discriminatory. It provides for international exemption such as Roquefort and Swiss cheese but denies Australian cheese makers a choice of making 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.
 - f. 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.
4. We are members of the Australian Speciality Cheese Makers Association and have requested that they make a submission on our behalf to support cheese makers choice to produce raw milk cheese.
 5. We have direct contact with consumers of our cheese at farmer markets and have received enormous support for the choice to consume Australian raw milk cheese products.

Signed : Carla Meurs

Ann-Marie Monda

Dated: 14 September 2008