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Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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**1. Background to our dairy farm and cheese making**

Good quality raw milk is essential for raw milk cheese production. As a small farm with cheese making facilities on site we are able to provide:

- farm and cheese production certified organic with National Sustainable Agriculture Australia (NASAA);
- single herd milk production on the farm and cheese made every day of the year from a combination of the night and morning milk;
- sound animal husbandry and management of the goat herd including health and herd size;
- free range grazing and adequate housing in inclement weather;
- sustainable soil and water management regime;
- clean and efficient milking system as audited by DFSV;
- an ideal farm that produces award winning cheeses;
- an ideal farm for the production of raw milk cheese.

**2. The Proposals exaggerate the risks of raw milk products and are out of step with current, 2006, European Regulations.**

We are concerned that the P1007 review, first assessment report, has taken an approach to regulation of cheese production that diverges for that being applied in the EC. This disadvantages Australian specialty cheese makers as it places limits on the production of raw milk cheese that do not apply to European cheese makers, who are our key market competitors. In a globalised open market economy this would be viewed as anti competitive, a form of trade barrier and places Australian specialist cheese makers at an unfair disadvantage.

We would hope that the FSANZ panel would have had the opportunity to review the document by the UK Specialist Cheesemakers Association – The Specialist Cheesemakers code of Best Practice (2007). Prince Charles reports it has become the bible for specialist cheesemakers. In this code, cheese makers of raw and pasteurised cheese have worked along side each other to develop a document that informs the production of raw and pasteurised cheese making in the UK. This document takes a bipartisan approach and has not set advocates for raw milk cheese production against advocates for pasteurised milk cheese production. The code of best practice was first

produced in 1997 and was updated to take account of new, 2006, EU food hygiene regulations. The main approach of the revised code of best practice is to ensure that all food safety hazards and risks are controlled by the use of HACCP principals.

The UK hygiene rules applying to milk production and cheese making were revised from January 2006 when the previous Directive was replaced by European Regulations that apply directly in all EU countries. A fundamental change in approach has been adopted, firmly placing the responsibility on the Food Business Operator to ensure all food safety hazards and risks are controlled by the use of HACCP principals. This change was signalled with the application from 1 January 2005 of Regulation (EC) 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matter of food safety. This regulation sets out the responsibilities of Food Business Operator and also includes requirements on tractability.

**3. The Proposals does not provide due consideration of capacity of starter culture activity, and correct acidification to inhibit the growth and development of pathogens in raw and pasteurised milk cheese.**

We produce cheeses that have high moisture and low acidity and should be listed in category 2 as the growth of pathogens does not occur at this pH environment. By having active starter cultures and correct acidity development, organisms such as *Listeria monocytogenes* do not have an opportunity to grow.

Through the process of the fermentation of milk, and the associated development of acidity, pathogens can be managed. In the FSANZ Microbiological Risk Assessment of Raw Milk Cheese there is no consideration of this unique principle of fermentation of milk used in cheese production. Using the Food Safety plans (DFSV) and the HACCP system there should be an opportunity to make raw milk cheese that would use acidity development as a critical control point in the management of pathogens.

**4. The Proposal places limits of cheese makers based on the assumption that the industry is not ready/able/capable of managing the production of raw milk cheese.**

The use of Food Safety Plans and HACCP systems need to be backed up by regulatory systems. We believe that these systems exist in Victoria through DFSV. Not all states have adopted the level of regulation that exists in Victoria and we hope that this inconsistency in regulation capacity across Australia is not influencing the very conservative approach to the regulation of raw milk cheese making in the Proposal

Currently Australia has very limited training facilities for cheese makers. It is the current practice of Australian speciality cheese makers to go to Europe to develop and improve their skills as cheese makers. On this matter we have attached our submission to the Director of the NCDEA.

**5. Costs associated with raw milk cheese production**

Energy costs associated with the pasteurisation and cooling of milk on our farm, including bottled gas delivered weekly to the farm and electricity use would off set the additional costs associated with testing raw milk cheese. We foresee no price increase of our cheese as a result of raw milk production.

## **6. Market opportunities and benefits**

It is our understanding that specialty cheese is the fastest growing market in Australian cheese production. This is a clear indicator that the market is interested and willing to pay for high quality specialty cheese. The recent development of the Coles Specialty Cheese counter, with its focus of high end, high price imported and Australian specialty cheese demonstrates this development in consumer demand. In fact the Coles pilot is due to be expanded to over fifty stores in Australia. This represents a huge growth in demand that will be met largely by imported European cheeses. These benchmark European cheeses will include cheese produced from raw milk. The Proposal limits the capacity of Australian specialty cheese makers to compete on an equal playing field with European imports.

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Dear Michael,

Thanks for the opportunity to raise some of our ideas on this topic

There are still many small farm house and artisanal cheese producers in Europe. It is an invaluable experience to work with these producers, who are highly focused and specialized in their cheese production and maturation. Their skills have been developed over a life time or more, and they are intuitive, hands on and practical. These are skills that cannot be learnt from a text book or even a cheese making course.

The art of cheese making goes way beyond the recipe, it is about the herd, the land, the milk, the facilities, the climate, the way challenges and changes are understood and managed. Learning the art of cheese making is about learning to use all your senses to work with the cheese. Refining your cheese making involves learning some of the tiny but important things that make a difference to your final product. Things like subtle changes in humidity or temperature, draining speed, drying, wrapping time.

When you go overseas, it is easier for cheese makers to share their knowledge as you are not perceived as a threat, as you will not be producing and selling in their market.

Interestingly we have trained a young French student in our goats' cheese production methods and she has used this knowledge to help her get a job in goat milking and cheese production in France.

There is nothing like getting out of your comfort zone and being renewed and inspired by the diversity and brilliance of what other producers are doing. For example when we visited Bra in 2007 for Slow Cheese, we were truly amazed by the range and quality of goats, sheep and cows milk cheeses. The flavours were different, often more subtle and delicate. We also had the opportunity to work with a small goats cheese producer in France and exchange our common challenges and share ideas and solutions in cheese making and herd management.

Travel and working with farmers and cheese makers also builds life long connection and relationships between cultures and people. In 1993 we worked in Ireland for 3 months on a small family farm; they continue to provide support and inspiration to us.

The first edition of Cheese and Wine, The cheese Planet magazine the latest cheese magazine from France describes the art of ladling curd, "A good moulder doesn't break the curds; the draining is slower, the productivity better and the texture more sensual." Reading these words and seeing the accompanying picture provides invaluable instruction and an insight into the aesthetics and sensitivity of cheese making. It is these small things that inspire, instruct and inform the development of great cheeses.

We are currently developing a goat/cow tomme and we plan to travel overseas to refine our production methods

Regards

Ann-Marie Monda & Carla Meurs, Holy Goat Cheese