

28 September 2011

To whom it may concern

I am writing in response to Proposal P1007-Primary Production & Processing Requirements for Raw Milk Products: 2nd Assessment Report

I was disappointed to read the report and my staff and I strongly object to this proposal. It will not make any fundamental changes to the current regulations in place and Australians should have the freedom to make their own choice about eating raw milk cheese just like the rest of the world!

Further more, we fully support the following objections made by other concerned parties:

Australian artisanal cheese makers should not be restricted to the production of Category 1 cheeses. Over the past two decades, international artisan 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 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.

The proposals do not recognise the changes adopted by the New Zealand Food Safety Authority which recognise EU standards on raw milk cheese, and allow the production and sale of raw milk cheese in New Zealand.

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 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.

Kind regards,


Shannon Bennett

