

## Seamons, Colleen

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**From:** Jo <jskymail@gmail.com>  
**Sent:** Monday, 22 August 2011 10:01 AM  
**To:** submissions  
**Subject:** Proposal P1007 - Primary Production & Processing Requirements for Raw Milk Products (call for public comment)

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Hi

I am happy to see that the some raw milk products that aren't currently allowed will be allowed in the future.

I am however, concerned that the **Category 3** products have been written off quite quickly without allowing further discussion on the matter – this was also my feedback at the earlier review stage  
And I ask that this are be opened up for a more comprehensive review and feedback opportunity after the immediate work on category 1 & 2 items are complete.

In particular, the public needs to understand how this risk assessment was undertaken and have the opportunity to review and refute the numbers that have been supplied, particularly as the references seem to all be international, some US, Costa Rica. This raises a very real question as to whether these are good predictors of contamination rates in Australian dairies, let alone organic dairies?

e.g. In 100,000 servings of raw milk, the review predicts "The burden of illness after retail purchase was predicted to be less than 1 case of campylobacteriosis, 97 cases of EHEC, 153 cases of salmonellosis and up to 170 cases of listeriosis (in a susceptible sub-population). The estimated number of cases are per 100,000 daily serves of a mean daily intake of 540 ml of milk to a child"

Kind Regards  
Jo Douglas

**From:** Jo <mail@joannedouglas.com>  
**Sent:** Tuesday, 13 September 2011 8:22 PM  
**To:** submissions  
**Subject:** Proposal P1007-Primary Production & Processing Requirements For Raw Milk Products: 2nd Assessment Report

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**Categories:** Blue Category

Please consider the following objections to the current proposal

1. 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.
2. 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.
3. 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.
4. 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.
5. The proposals are anticompetitive and represent a breach of Australia's commitment to WTO:
  - a. 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".
  - b. Article 5.2 states in the assessment of risks "Members shall take into account available scientific evidence".
  - c. 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 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  
Jo Douglas  
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