



Monday, September 01, 2008

**Proposal P 1007 primary production & processing Requirements for Raw Milk products (Australia only)**

Dear Sir / Madam

**Restaurant & Catering Association of Victoria**

As the peak industry body for the industry, Restaurant & Catering Association of Victoria exists to represent the interests and views of its members.

Our activities include:

- representation and advocacy to government
- representation on a range of boards, bodies and consultative groups
- policy development
- providing products and services
- networking opportunities
- professional development

Restaurant & Catering Victoria, together with other like State Associations, is part of a national network - Restaurant & Catering Australia. The role of Restaurant & Catering Australia is to represent the interests of restaurateurs and caterers at a national level.

Both Restaurant & Catering Victoria and Restaurant & Catering Australia are active in representing the interests of the industry on a range of issues including taxation, skilled migration, tourism, food safety, workplace relations, training and occupational health and safety to name just a few.

The association has a membership of over 1100 member businesses across Victoria covering all facets of the hospitality sector.

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Restaurant & Catering Victoria welcomes the opportunity to provide a response to the FSANZ discussion paper P 1007 into Primary Production & Processing Requirements for Raw Milk Products.

### **Submission Detail**

Restaurant & Catering Association of Victoria would like to register its support for an amendment to the code to bring Australia into line with other major international cheese manufacturing countries

The Associations objections to the current standards that prohibit the production and sale of most cheese made from raw milk in Australia are as follows:

1. Any regulatory that structure that unnecessarily lessens the diversity of produce available to our industry has a negative impact on quality of products that can be delivered by the sector and lessens the sectors international competitiveness.
2. 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 verified.
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 and out of step with scientific studies and the microbiological standards applied in countries overseas
5. 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.
6. The standard is highly discriminatory. It provides for international exemptions such as Roquefort and Swiss Cheese but denies Australian



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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.

7. 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 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 counterparts overseas Australian consumers have been denied a choice of cheeses made from raw milk.

8. 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

Restaurant & Catering Victoria would like to thank FSANZ for the opportunity to make a submission to the discussion paper P 1007 on Primary Production & Processing Requirements for Raw Milk Products

The Association trusts its submission outlining the views of the restaurant and catering sector in Victoria will be taken into consideration during the regulatory reform process in this area.

Should further consultation be required with Restaurant and Catering Victoria as a result of this submission, please contact:

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