

## PROPOSAL P1007

### PRIMARY PRODUCTION & PROCESSING REQUIREMENTS FOR RAW MILK PRODUCTS

#### SUBMISSION TO 1<sup>st</sup> ASSESSMENT REPORT

There appears to have been little consultation during the assessment with the actual cheese producers or dairy farmers – the very people who are making the products. It is these people that can provide realistic information regarding production techniques and the possible negative or positive effects of any changes. As a cheesemaker, I would like to put forward the following submission.

#### INDUSTRY CHANGES

I believe that a very small proportion of cheese producers would begin production of raw milk cheese if permission were granted. These would include the smaller companies that make small volumes of cheese, never enough to be able to export. Large scale (industrial) producers on the other hand, who do produce enough cheese to export, will probably never make raw milk cheese due to the problems that can arise with production. Problems include batch inconsistencies such as changes in yield and taste, wastage due to blowing, uncontrolled growth of moulds and inconsistencies with milk from seasonal and environmental influences which can affect the maturation time, curd setting time etc etc. Small producers can recognise and better cope with these inconsistencies because the production is more hands-on; the whole cheesemaking process is followed by a few individuals from start to finish. Compared to large cheese factories where one team will receive milk, one team pasteurises, one team adds rennet...and so forth. It is also known that unpasteurised cheese can ripen faster than pasteurised cheeses, effectively shortening the shelf life of a product which is not good for supermarket cheese.

A change in production methods may also incur extra expenses associated with HACCP changes, additional product testing and audits. The costs are already being passed to the producer where before all of our sampling was funded by the health departments. In layman's terms, 'if it ain't broke, don't fix it'. Especially if it is going to be more expensive in the long run.

#### CATEGORY PARAMETERS

With regards to the category parameters, I believe that category 3 products should be reassessed based on the risk they pose to public health. Raw drinking milk should be in a separate category, with category 3 raw milk cheeses on their own.

##### Raw milk

With production of raw milk, there are very few post-pasteurisation control measures that can safely eliminate milk-borne pathogens. The scale of production of milk is also a factor with

regards to the effectiveness of control points. Large scale milk processing plants are the norm in Australia, they usually pool milk from multiple dairies so the inputs are greater and have higher risk of being contaminated with milk-borne pathogens. These plants generally use more machinery, pumps, bulk tanks etc which are more prone to non-milk borne contamination. There is possibly less risk if a single dairy with a small herd of milking animals is producing milk and bottling it themselves, which eliminates the use of bulk milk tanks, tankers and transport. If a nationwide code is applied, these small dairies will 'miss out' on the chance to produce raw milk as the result of the risk imposed by their larger counterparts. We would have to carry out individual risk assessments on each dairy that wanted to produce raw milk. I imagine the costs associated with this would discourage the producers and the relevant health departments which are already beginning to charge the costs from the actual producers (registration fees, audit charges etc.).

### Raw milk cheese

With category 3 raw milk cheese however, there are many control measures that follow the pasteurisation step that would effectively reduce or eliminate milk-borne pathogens if pasteurisation were to cease. These include; the addition of starter culture, addition of salt or brine, maturation time (the longer the better for the elimination of pathogens) and addition of non-milk ingredients (i.e. garlic, herbs, some of which have known antimicrobial effects). The pre-pasteurisation inputs are generally less risk-prone as raw milk producers will typically be small-scale, often sourcing milk from their own single herd.

To summarise, I believe it is the raw drinking milk in category 3 which presents a medium-high risk to public health, and this risk cannot be sufficiently reduced with post-pasteurisation control measures. Category 3 raw milk cheese however, does not present the same level of risk, and the post-pasteurisation control measures are sufficient to lower the risk to public health.

Consequently, I believe that option 4 should be reworded, or an option 5 added which allows production of raw milk cheese only.

### OUTCOMES

As producers, we currently make an unpasteurised hard cheese (which is matured for over 12 months). The bonus in making unpasteurised cheese is a reduction in the amount of power we use, as our pasteuriser uses a lot of power. Consequently, our production cost would be lower if we made exclusively unpasteurised cheese. If however, we are allowed to make category 3 raw milk cheese, there is the worry that red tape will worsen and the associated costs will far outweigh the positives. We currently have fortnightly testing by the health department at no cost and this provides a very real assurance that our product is safe. We have been informed that this regular testing is either going to cease altogether, or be self-funded by the producers. There appears to be increasing reliance on HACCP-based monitoring which although sound in theory, does not provide as real an assurance as laboratory testing does. HACCP programmes are a paper trail only and can be fabricated or amended to suit whatever interest. If the option to produce unpasteurised cheese incurs extra cost and red tape, it is not a choice many small producers would take.

There is also the worry that with the freedom to domestically produce raw milk cheese, the import market will increase and Australian cheeses will be pushed off the shelves. It is a fact that Australian artisan cheese producers cannot compete with imports as these imports are subsidised, cheap and smart marketing sells these cheeses as “unique, made in the mountains of France and so forth...” when the reality is the majority of imports are industrial cheeses. Our biggest barrier to sales is the import market, with customers often saying they get their Greek feta from a deli in Perth, or they get their Roquefort from France or their Parmesan from Italy. The majority still buy their cheese from the supermarket in the form of industrial block cheese (mock cheddar varieties), and the gourmet buyers are becoming increasingly interested in European cheeses. A small proportion does support local produce, but price is a factor.

To summarise, it could be beneficial for Australians to produce raw milk cheese but not if the import market is further opened to more raw milk cheeses. The very producers that choose to make unpasteurised cheese could soon be pushed out of the market.

Obviously FSANZ cannot put restrictions on the import market that would benefit domestic production, unless imports pose a risk to public health. With the potential for the cheese import market to grow overnight following changes to the code, there is the concern that regulations may be relaxed. Australia is currently free from many of the diseases that exporting countries have, and with the recent relaxation of the rules on BSE-beef, the concern is warranted.

In conclusion, I do not support the decision to deny option 4 as it currently stands. I believe that category 3 products need to be reassessed based on the risk they pose to public health. It appears that the risks associated with raw drinking milk are an unfair barrier to the production and sale of category 3 raw milk cheese.

I offer this opinion with a degree of hesitance; the outcome could result in the demise of the domestic artisan cheese industry if the change to the code allows the increase and expansion of foreign raw milk imports.

Regards,

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CAMBRAY SHEEP CHEESE

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