

Seamons, Colleen

From: Charlotte Francis [cfran@tpg.com.au]
Sent: Wednesday, 10 September 2008 4:52 PM
To: submissions
Follow Up Flag: Follow up
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Re: Proposal P1007 Primary Production & Processing Requirements for
 > Raw Milk Products (Australia only)

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- > I would like to register my support for an amendment to the code to
 > bring Australia into line with other major international cheese
 > manufacturing countries.
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- > My objections to the current standards that prohibit the production
 > and sale of most cheese made from raw milk in Australia are as
 > follows:
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- > 1. The purpose of the Standard is to guarantee safe
 > cheese \u2013 however the assumption that pasteurisation as a single
 > step will guarantee safety is not scientifically valid.
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- > 2. The single critical control point that guarantees
 > safety for all cheese varieties is starter culture activity that
 > creates a hostile environment to pathogens in the cheese. Starter
 > culture activity comprises two biological components, the first is
 > primary fermentation of milk sugar to organic acids during cheese
 > making and the second is secondary fermentation/metabolism of
 > organic acids, fat and protein during ripening. This principal is
 > supported by scientific studies and accepted by all of the major
 > cheese producing countries of the world i.e. European Union (EU),
 > USA, and Canada.
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- > 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.
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- > 4. The microbiological standards for cheese are overly
 > onerous in relation to E.coli and have led to very questionable
 > practices in domestic production. The standard is out of step with
 > scientific studies and the microbiological standards applied in
 > overseas countries.
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- > 5. The standard is a breach of Australia\u2019s commitment to
 > WTO Policy, as it cannot be justified on scientific grounds for
 > food safety.
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- > 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'.
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- > Article 5.2 states in the assessment of risks 'Members shall take
 > into account available scientific evidence'.

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- > 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'.
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- > 6. 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.
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- > 7. The standard is highly discriminatory. It provides
- > for international exemptions such as Roquefort and Swiss cheese but
- > denies Australian 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.
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- > 8. 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
- > cheeses 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
- > overseas counterparts Australian consumers have been denied a
- > choice of cheeses made from raw milk.
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- > 9. 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.
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- > Signed: Charlotte Francis
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