



**Food Standards Australia New Zealand – Consultation Paper – Proposal P1024**

Revision of the Regulation of Nutritive Substances & Novel Foods

**Due Date:** 28 July 2017

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This submission is in response to the awareness that Proposal P1024 could negatively impact the New Zealand cheese making community.

The New Zealand Specialist Cheesemakers Association (NZSCA) represents members who range in size from multinational dairy companies to those who make cheese from the milk of 6 goats. One characteristic of us all is that we all use micro-organisms and we make a wide variety of products, from highly traditional to quite innovative.

Currently New Zealand commercial cheesemakers are required to ensure all end-product is safe. There is no prescriptive limit to the use of micro-organisms in the manufacture of safe food. This is an outcomes based system, which has been deemed acceptable. NZSCA sees no need for this to change unless there is clear evidence of a decline in food safety.

NZSCA is concerned that there is a lack of clarity “of intent” in the discussion documentation regarding micro-organisms. We wish to highlight the potential for “un-intended consequences” in the proposal as it is currently written.

Innovation in the dairy industry is largely achieved through the use of fermentation. Fermentation food products in addition to dairy include meat, fruit and vegetables, alcohol, tea, coffee, baked goods etc, and we imagine that innovation for these sectors may also involve fermentation. Fermentation involves micro-organisms, and being prescriptive in their use not only will impact on innovation, but may also impact on current activities if an incomplete, or poorly described “positive” micro-organism list is in the Food Standards Code.

Until NZSCA has a clear idea of what FSANZ is actually hoping to achieve with the “micro-organisms” sections of the Regulation of Nutritive Substances & Novel Foods, we cannot support any proposal.

Further to that end, NZSCA will need to be sure any future revised proposal will not impact negatively on current or currently planned activity without clear indication of a decline in food safety.

Thank you.

If you need or wish to clarify anything written here please feel free to contact Diana Hawkins at the above email address.