

## **SUBMISSION to 2<sup>nd</sup> Assessment Report of Proposal P1007 - Primary Production & Processing Requirements for Raw Milk Products**

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Thank you for the opportunity to comment on the 2<sup>nd</sup> Assessment Report of Proposal P1007.

I commend FSANZ for acknowledging that there is “growing public demand for a wider range of raw milk products” and for their willingness to “assess alternative, feasible safety systems for raw milk products that preserve the integrity of the products while maintaining an acceptable level of public health and safety.”

While it is disappointing that the current Proposal has been limited to option 2, and not option 3 (as recommended at 1<sup>st</sup> Assessment), I commend FSANZ for its decision to progress quickly with permissions for category 1 products, without allowing the need for further technical work on category 2 products to slow down the process.

I also commend FSANZ for its decision to allow existing permissions to remain (ie, Swiss-styles and Roquefort) and to address raw goat milk under a proposed new Proposal, as I believe it would have been a regressive step to rule out products that are currently legal.

I am looking forward to seeing the new Proposal at the end of 2011, and the opportunity to comment on it.

I am a **speciality cheese retailer** with more than 6 years full-time experience, and consider *Fromager* to be a description of my profession (equivalent to a *Sommelier* for wine). My main role as a *fromager* has been at GPO Cheese & Wine Room – one of only 3 stand-alone, speciality cheese stores remaining in Sydney – but I have also worked at other reputable Sydney retailers including David Jones’ Food Hall, Formaggi Ocello, Simon Johnson Purveyor of Quality Foods, and Cheese Selectors.

As part of my role, I deal directly with many small Australian cheese producers, rather than the more common retailer model of simply purchasing cheeses from a distributor, without any personal contact with the producer. I therefore have detailed, first-hand knowledge of many of the wants and needs of speciality cheese-makers (including those who are currently actively seeking to make cheese from raw milk), as well as the wants and needs of consumers of specialty cheeses in Australia.

I am also an **accredited cheese judge** with the Royal Agricultural Society of NSW (since 2008) and the National Centre for Dairy Education Australia (since 2011), and have also judged at the Australian Speciality Cheesemakers’ Association (since 2008) and the World Cheese Awards in the UK (2009 and 2010).

While I am not qualified to offer technical or scientific comment on the Proposal, I feel well placed to comment from a **consumer** perspective on several aspects of the Proposal, as detailed below.

## **Addressing inconsistencies**

I commend FSANZ on its objective to address the current inconsistencies in the regulation of raw milk products in Australia. It is essential that nationally applicable requirements are clarified, rather than differing State-based provisions for raw milk products. If a product is deemed safe by FSANZ, it should be considered safe for all Australians, regardless of which state they live in.

In relation to this, I believe the current standard leaves too much room for State & Territory enforcement/licencing agencies to take a 'veto' role in the production of locally-made raw milk cheeses. Anecdotally, I am aware of several cases where local producers have contacted the NSW Food Authority requesting information about producing raw milk cheese – using the same case-by-case assessment to FSANZ as was utilised for Bruny Island Cheese Co in Tasmania, in cooperation with the Tasmanian Dairy Industry Authority – who have been told unreservedly that they will not be allowed. I hope the wording of the new requirements will be clear and unambiguous so that cheesemakers in all States and Territories will be allowed to produce category 1 raw milk cheeses, if they choose to do so. I therefore urge the Implementation Sub-Committee to facilitate a nationally consistent approach.

It is also essential that consistent permissions are provided for the sale of imported and domestically produced raw milk products, allowing domestic producers to compete fairly with international producers. The current inconsistencies give consumers the impression that there is something inferior about cheese production in Australia, if it is ok to import hard cooked-curd raw milk cheeses, but not possible for local producers to make them.

Essentially, if cooked-curd styles such as Swiss Gruyeres, French gruyeres (eg, Beaufort & Comte) and Italian Grana styles (eg, Parmigiano Reggiano and Grana Padano) can be imported because they are considered to pose a very low risk for both the general and susceptible population, then the same styles of cheese should be legal to produce in Australia. Further, if Roquefort can be imported, then local producers who wish to make Roquefort-style blue cheeses should be allowed to demonstrate that their production methods meet FSANZ guidelines too.

## **Defining the boundary between category 2 and category 3 products**

While I realise this issue will probably become part of the scope for the proposed new Proposal, I believe it is worth noting here that it will be crucial to defining this boundary, not only for producers but particularly for consumers (and for GP's, who are most often the ones advising high risk/susceptible members of the population, such as pregnant women and people with compromised immune systems, about "high risk" foods).

I note that there is some inconsistency/ambiguity in the 2<sup>nd</sup> Assessment report, highlighting the challenges surrounding this issue. For example, on p11, feta (a fresh cheese) and camembert (a soft mould ripened style) cheeses are listed under the heading 5.2 Category 2, whereas on p12, "softer mould ripened varieties" and "fresh cheeses" are referenced under the heading 5.3 Category 3.

## **Deletion of specific cheese names in Standard 4.2.4A**

I commend FSANZ on its decision to delete references to specific cheese names in the Standard, as it currently does not represent the full range of legally-imported cooked-curd cheeses (eg, it doesn't currently include Parmigiano Reggiano), nor does not allow for additional cheese styles in future.

However, I believe very clear definitions need to be provided so that only category 1 products are allowed, as there are already many importers bringing in cheeses that are not cooked-curd styles but which are made from raw milk (eg, some brands of Manchego, other Italian hard (but not cooked-curd) cheeses such as some types of Pecorino Toscano, etc), possibly due to a loose interpretation of “hard cheese”. In order to protect the integrity of the Australian cheese producers, it is important that there is a level playing field, as already discussed in “Addressing inconsistencies” above.

### **Recent approval of Bruny Island raw milk ‘C2’ cheese in Tasmania**

In April of this year, I was one of only a small number of retailers in Australia (and I believe the only retailer in Sydney) allowed to sell the recently-approved raw milk C2 cheese, produced by Bruny Island Cheese Co in Tasmania. I can therefore offer a unique retailer perspective on this issue.

First, I believe the consumer response was very positive for the Australian speciality cheese industry. There was a real ‘buzz’ surrounding the launch of the cheese, aided by a prominent media report in Sydney. Consumers felt it was ‘exclusive’, ‘special’ and ‘an Australian first’ and many, many people commented along the lines of “finally, Australian producers can make raw milk cheese.”

Second, it provided a valuable educational and communication opportunity, and opened a meaningful dialogue between retailers and consumers about raw milk cheeses. It also allowed some facts about raw milk cheeses to be discussed, and some myths and misconceptions to be de-bunked. It also highlights the unique position and role played by speciality cheese retailers, as opposed to supermarkets and large delis/grocers without specialist staff, in promoting Australian-made speciality cheese products.

Overall, I strongly believe that further permissions for the production of raw milk cheeses by Australian producers would be very positive for the producers in particular, and for the Australian speciality cheese industry in general.

### **Labelling**

While I realise this issue has not been raised in relation to category 1 products, I wish to comment that labelling should *not* be required for category 1 products, for the following reasons:

- If category 1 products are deemed “low risk” there is no need for labelling
- Labelling is not currently required for imported category 1 products, such as Parmigiano Reggiano and Swiss Gruyere, nor for Roquefort or Bruny Island ‘C2’
- Labelling of category 1 cheese would be very challenging as most hard, cooked-curd cheeses (particularly the imported ones) are made in 30-50kg wheels, and are normally pre-portioned by wholesalers, and further portioned by retailers before sale to consumers.

I look forward to the opportunity to provide comment on the issue of labelling for category 2 products when the proposed new Proposal is released.