



Australian Food Sovereignty Alliance Peoples' Food Plan

Food Safety

Executive summary

Australia has a very low incidence of food safety outbreaks, and AFSA seeks to maintain this food safety track record, while highlighting the disproportionate compliance burden placed on small- and medium-scale food businesses.

In most cases, small- and medium-scale food businesses are asked to meet the same standards as large-scale food businesses and importers. For example, in NSW, where a pasture-based egg producer is grading 100 eggs per day by hand for local consumption within days (not weeks like industrial eggs), they have to undergo an identical accreditation process to an industrial battery farm producing hundreds of thousands of eggs per day. This calls for a decreased regulatory burden and small-flock exemptions.

It is important to note that many small- and medium-scale food producers are also food businesses, who conduct processing and retailing of food, often selling direct to consumers. Therefore, the risk points that arise in the conventional industrial supply chain are vastly reduced, due to shorter supply chains resulting in less cold-chain risks and potential contamination points, as well as increased traceability.

Australia's food safety regime has a narrow focus on things that might kill you quickly (e.g. pathogens), entirely ignoring the plethora of things that are killing people slowly, such as highly-hazardous pesticides and ultra-processed foods. While the Peoples' Food Plan does not advocate a lax approach to food safety, it does firmly propose a systemic look at what makes food systems and the food they produce unsafe.

As with all aspects of the Peoples' Food Plan, this section puts forward the need to not only consult with smallholders, First Peoples and local communities, but to collaborate and empower civil society to collectively determine our own food and agriculture systems in small-scale direct and transparent local food economies. The case studies showcase two of Australia's best cheesemakers, who have pioneered a fledgling raw milk cheese industry, showing that the orthodoxy of sterility in food safety regimes is not the only safe path to food production, and is often a less delicious way that erodes smallholder and community autonomy in the food system.

Key peoples' policy recommendations*:

Local Governments:

- Support the setup of Participatory Guarantee Systems (PGS) in local areas. PGS' are locally focused quality assurance systems. They certify producers based on active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange.¹ These could be developed for many areas of the production, processing, distribution and consumption parts of the food system.

State Governments:

- Review the consistency of food regulation approaches and make subsequent reforms that are commensurate with the level of risk of different scale food producers and the length and complexity of their supply chains.
- Include democratically-elected representatives of smallholders and civil society in stakeholder groups in the development of food safety policy and regulation. Representation from broader cross-sections of food and agriculture will ensure that food safety regulations are developed at scale of risk to public health.

The Federal Government:

- Undertake a review of the ability of state and local jurisdictions to easily and consistently interpret the food standards set at the Federal level, to ensure small- and medium- scale food businesses can consistently meet the food standards, without the need to overcome different application processes and inconsistency between state and local (e.g. Environmental Health Officer) auditing processes.
- Implement One Health approaches to livestock production to limit the risks of zoonotic disease and antimicrobial resistance, and allow for State and Local Governments to replicate this model across all states and territories.
- Ensure that food regulators (eg. FSANZ) include democratically-elected representatives of smallholders and civil society in stakeholder groups in the development of food safety policy and regulation. Representation from broader cross-sections of food and agriculture will ensure that food safety regulations are developed at scale of risk to public health.

****Please refer to the Right to Food section of AFSA's Peoples' Food Plan for a full list of policy recommendations for local, state and federal government.***

Case studies

¹ <https://www.ifoam.bio/our-work/how/standards-certification/participatory-guarantee-systems>

Prom Country Cheese (VIC)²

Located in Moyarra - South Gippsland on the Traditional Lands of the Bunurong People and the Gunaikurnai People, Prom Country is Victoria's first licenced Raw Milk Cheese facility. The Prom Country Cheese label was launched in 2012 with an emphasis on showcasing the regional origin of their milk and in March 2020, the business was approved as the first commercial cheesemaker in Victoria to produce uncooked, entirely raw cheese under strict new food standards regulation. Using fresh, certified organic milk, their range of traditional cheese includes natural-rinded semi-hard cheese, soft cheese, marinated and blues, with plans to expand the business and produce bovine raw milk cheese.

Bruny Island Cheese³

Founded by Nick Haddow in 2003, Bruny Island Cheese Co. in Tasmania was started after Nick spent 10 years working with specialist cheesemakers in many different countries around the world. Their craft is rooted in tradition and their methods are uncompromising. Production is small and reflects the seasonality of where we live, farm and create.

Because pasteurisation kills bacteria, it is the first and foremost reason countries in the West have mandatory pasteurisation laws for all commercial dairy products. It is a safety net designed to protect the lowest common denominator. However, these laws are becoming less defensible because unsafe cheese can still be made using pasteurised milk. Raw milk from healthy animals is, fundamentally, a safe food. But it is also the perfect growth medium for pathogenic bacteria. Cheese is a fermented food. Fermentation is a natural and ancient food preservation technique which can render unsafe foods safe. The primary fermentation in cheese is the conversion of lactose (the sugar in milk) into lactic acid. This job is done by bacteria, which occur naturally in milk. Nick believes in the past 50 years, the Australian Government has adopted a conservative, risk-averse approach to food safety standards for cheesemaking, despite his traditional methods predating food science by centuries. He believes regulations must be changed; not only to recognise that raw milk cheese can be made safely but also to allow for the development of real cheese with true regional character.

² <https://promcountrycheese.com.au/>

³ From is an edited extract from MILK. MADE. WHAT'S THE STORY WITH RAW MILK CHEESE? By Nick Haddow published by Hardie Grant Books <https://www.brunyislandcheese.com.au/>