

Raw milk cheese production – amendments to Standard 4.2.4

Background

Changes have recently been made to the Primary Production and Processing Standard for Dairy (Standard 4.2.4) to enable the production and sale of selected cheeses made from unpasteurised milk.

These changes became law in February 2015.

The changes

The Standard requires strict through-chain control over the production, transport and processing of raw milk to ensure final product is safe for consumers. They are in addition to existing requirements under Standard 4.2.4. Detailed guidance documents have been prepared by FSANZ to assist producers wishing to take up the opportunity to participate in the raw milk cheese production chain. Applicants will need to demonstrate their compliance before being approved.

People or businesses wishing to produce or carry raw milk for making raw milk cheese, or indeed make raw milk cheese, will need to develop, or amend an existing food safety program (FSP) to incorporate all relevant elements of the Standard, and submit it to DFSV for approval.

Premises, practices and equipment will also need to be set up so that the requirements of the Standard and related guidance material are met.

Dairy farm and carrier businesses approved for production of raw milk or raw milk cheese will be subject to more frequent auditing, testing and monitoring regimes due to the increased food safety controls required to ensure the safety of raw milk for processing and the added risk associated with production without pasteurisation.

In addition, heightened testing and monitoring regimes will be required of manufacturers throughout production to verify controls along the production chain and in ongoing validation of the product and process.

Further information is provided below for each licence type on how to start producing for raw milk cheese production.

Dairy farmers

If you are a dairy farmer that would like to produce milk for raw milk cheese there are a number of things you will need to do to address the additional requirements under 4.2.4 in a documented food safety program for DFSV approval.

You will need to demonstrate to DFSV that the required additional measures are in place in your food safety program, dairy and milking practices and that an acceptable level of safety can be achieved.

This will include how you will manage animal health and identification, control inputs, enhance the hygiene of milking operations, and meet more stringent microbiological criteria.

The specific requirements for dairy farmers producing raw milk for raw milk cheese are outlined on the [FSANZ website](#) and [DFSV checklist](#)

Dairy carriers

Where raw milk for raw milk cheese needs to be transported from the farm to the factory, a dairy carrier business approved to carry this milk must be used.

Dairy carriers wishing to transport raw milk for raw milk cheese making will also need to address some additional requirements in their food safety program and have it approved by DFSV.

The additional measures relate to temperature control and developing a procedure to ensure there is no cross-contamination between milk intended for raw milk cheese manufacture with that for general dairy processing.

Specific requirements are outlined on the [FSANZ website](#) and [DFSV checklist](#).

Dairy manufacturers

Manufacturers intending to produce raw milk cheese need to address the additional requirements under 4.2.4 in a documented and validated food safety program for DFSV approval.

In addition to ensuring that the food safety program is adequate to ensure compliance with the Standard a manufacturer needs to provide evidence that their proposed product will consistently meet the qualifying criteria: that the finished product will not support the growth of pathogens and there is no net increase in pathogens during the production process.

Specific requirements are outlined on the [FSANZ website](#) and [DFSV checklist](#)

Production must not commence prior to DFSV approval of all aspects of proposed (farm, carrier or manufacturer) supply chain. Without an approved, compliant supply of raw milk or an approved, compliant carrier (if one is required) the through-chain measures designed to ensure the safety of the finished product are not in place.

How to apply for approval to produce or carry raw milk for raw milk cheese production or to manufacture raw milk cheese

Farmers, carriers, and manufacturers wishing to enter the raw milk cheese value chain should read through the guidance documents detailed in the relevant sections above.

You will need to modify your dairy, tanker (and cleaning equipment), or factory so that you can satisfy all requirements.

You will need to develop or modify your food safety program so that it also complies with the guidance material.

DFSV will inspect your premises and food safety program and both must be approved before you can commence business producing or carrying milk for raw milk cheese products.

After approval of a manufacturer's premises and food safety program, they will also need to undertake a validation process to prove that the proposed raw milk cheese product will satisfy the qualifying criteria every time it is produced. DFSV will work with applicants to ensure that the validation process is appropriate for the product proposed. DFSV has access to predictive models that can assist manufacturers to determine whether a product will qualify or not prior to the validation process (or costly modifications of premises and food safety program have been undertaken). A proposal for the validation process must be approved by DFSV prior to commencement.

Prospective applicants are encouraged to contact DFSV early on to discuss the requirements or to apply to produce or transport raw milk for making raw milk cheese, or to produce raw milk cheese.