



Proposal to amend Food Standards to allow for
the importation and sale of Roquefort cheese and
raw milk extra-hard grating cheeses

Consultation Process and Invitation for Public Comment

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1 Overview

This discussion document outlines the New Zealand Food Safety Authority's (NZFSA) proposal to amend the New Zealand (Milk and Milk Products Processing) Food Standards 2002 and the New Zealand (Prescribed Foods) Food Standards 2002 in order to allow for the direct importation (i.e. from any country) and monitoring of Roquefort cheese and raw milk extra-hard grating cheeses. For the purposes of this document 'raw milk' is defined as Cheese or milk that has not been subject to any heat treatment recognised in New Zealand food legislation¹ i.e. pasteurisation or thermisation.

New Zealand food legislation currently permits the direct importation and sale of three named Swiss raw milk cheeses (Emmental, Gruyere and Sbrinz). Australia also permits the importation of these three cheeses. In addition, Australia permits the importation of raw milk extra-hard grating cheeses and Roquefort. Under the Trans Tasman Mutual Recognition Agreement (TTMRA) products that can be legally sold in Australia can be sold in New Zealand. Extra hard grating cheeses have been imported to New Zealand via Australia for several years and some importation of Roquefort via Australia has also been occurring in the last year or so. However, these cheeses cannot be imported directly i.e. when exported from any other country.

NZFSA proposes that the direct importation of Roquefort and raw milk extra-hard grating cheeses be permitted by amending the New Zealand (Milk and Milk Products Processing) Food Standards and the New Zealand (Prescribed Foods) Food Standards. Amending the former standard will allow for Roquefort and raw milk extra-hard grating cheeses to be imported and sold in New Zealand. Amending the Prescribed Food Standards will allow for these cheeses to be monitored on entry to New Zealand.

1.1 Roquefort cheese: Draft Import Health Standard

Biosecurity New Zealand (BNZ) has drafted an Import Health Standard (IHS) to allow the importation of Roquefort from a biosecurity perspective. The draft IHS has been released for consultation concurrent with this proposal and can be viewed at

<http://www.biosecurity.govt.nz/strategy-and-consultation/consultation/ihs#animals>

Submissions on this draft IHS should be sent to BNZ.

2 Consultation

Comments on these proposed changes are being sought from importers, industry, key trading partners and other stakeholders. Submissions are invited from any interested party, whether representing organisations or acting as individuals. When sent on behalf of an organisation, the submission should include the position in the organisation of the person signing the submission and the extent of internal consultation undertaken in preparing the submission. All submission formats will be accepted. Please address the questions under the subject areas detailed on page 13 Questions and Submission Form. You are welcome to comment on any additional matter relating to the proposal.

2.1 Address for submissions

Please send your submission on this proposal to:

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New Zealand Food Safety Authority
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Wellington – New Zealand

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Email: hilary.eade@nzfsa.govt.nz

2.2 Closing date for submissions

The closing date is 8 June 2007.

2.3 Official Information Act

The Official Information Act 1982 (OIA) states that information is to be made available unless there are grounds for withholding it. Grounds for withholding information are in the OIA. Submitters may wish to indicate grounds for withholding information contained in their

¹ New Zealand (Milk and Milk Products Processing) Food Standards 2002 and Animal Products Processing

submission. Reasons for withholding information could include that information is commercially sensitive or that the submitters wish personal information such as names or contact details to be withheld. NZFSA will take such indications into account when determining whether or not to release information. Any decision to withhold information requested under the OIA may be reviewed by the Ombudsman.

2.4 Process after submissions

After analysing submissions, the NZFSA will make recommendations to the Minister for Food Safety. If the Minister agrees, the amendments to the New Zealand (Milk and Milk Products Processing) Food Standards and New Zealand (Prescribed Foods) Food Standards will be signed and gazetted to come into force July 2007. The new import requirements would apply from that date.

Process	Target date
Consultation	15 May – 8 June 2007
Analysis of submissions & revision of proposal	11 - 15 June 2007
Minister's consideration of proposed amendments to food standards	18 - 22 June 2007
Gazettal of amended food standards	28 June 2007
Implementation (28 days following gazettal)	26 July 2007

3 Background and current situation

3.1 Roquefort cheese

Roquefort cheese is a traditional French semi-hard blue veined cheese, veined with the mould *Penicillium roquefortii* and manufactured using raw ewe milk. It is a specialty cheese produced in limited quantities.

Roquefort has been able to be imported from Australia to New Zealand under the TTMRA since Australia approved its sale in September 2005. However, it is currently not able to be imported from any other country directly into New Zealand as, with the exception of the three Swiss cheeses mentioned in the overview section and extra-hard grating cheeses able to be imported under TTMRA, the sale of cheese manufactured using milk that has not been pasteurised or thermised is not permitted.

For several years NZFSA has been undertaking research work related to heat inactivation of pathogens and raw milk cheeses. In parallel to the research work NZFSA undertook a risk assessment on the risks associated with consumption of Roquefort cheese. The decision to assess Roquefort ahead of completion of the various research projects was prompted in part by a request from the French government to allow the importation and sale of Roquefort in New Zealand. The request followed the Australian government's decision to allow the importation of Roquefort into Australia.

3.2 Raw milk extra-hard grating cheeses

Extra-hard grating cheeses made from raw milk are manufactured by heating the curd to a temperature of no less than 48°C, and have a very low moisture content (<36%) following long maturation/ripening periods (greater than six months at no less than 10°C). Cheeses manufactured to these criteria using good hygienic and manufacturing practices have low food safety risks as the cooking of the curd and long maturation control/destroy bacterial pathogens and the low moisture content inhibits subsequent growth. As a result, extra-hard grating cheeses manufactured from raw milk are considered to have similar microbiological safety to products derived from pasteurised milk.

The cheese varieties typical of the extra-hard grating cheeses include Parmesan, Romano, Asiago and Montasio and are generally made from cow or sheep milk. Because of their hard texture and strong flavour, they are generally used in small quantities as grated cheese and so are often referred to as extra-hard grating cheeses. Codex² has a standard for “extra hard grating cheese” which includes some principal characteristics for this cheese.

Extra-hard grating cheeses made from raw milk are currently able to be imported into New Zealand from Australia under TTMRA but are unable to be imported directly from any other country as the New Zealand (Milk and Milk Products Processing) Food Standards does not allow for cheese manufactured from non heat-treated (thermised or pasteurised) milk to be sold in New Zealand.

The sale of imported raw milk extra-hard grating cheeses is specifically permitted in Australia through an exemption to the heat treatment requirements in Standard 1.6.2: Processing Requirements of the Food Standards Code, which only applies to Australia. The Food Standards Code was amended following a Food Standards Australia New Zealand (FSANZ) assessment³ which concluded that the manufacturing processes assessed for extra hard grating cheeses provide an equivalent level of safety as cheeses from heat-treated milk.

Under the Food Act 1981 raw milk cheeses are unable to be imported into New Zealand from countries other than Australia as the New Zealand (Milk and Milk Products Processing) Food Standards, which applies to all cheese sold in New Zealand including imported product, only allows for cheeses to be manufactured from heat-treated milk (with the exception of the three Swiss cheeses mentioned in the overview section). This means that despite being sold in New Zealand for many years, extra-hard grating cheeses are unable to be imported directly to New Zealand from countries other than Australia.

NZFSA does not have any food safety concerns in respect of these extra-hard grating cheeses, viewing them as similar in risk to cheeses made from pasteurised milk.

² Codex International Standard for Extra Hard Grating Cheese, *CODEX STAN C-35-1978*.

³ Food Standards Australia New Zealand (2002) *Proposal P263 – Assessing the Safety of Raw Milk Very Hard Cooked-Curd Cheeses (Parmesan Style)*. Canberra, Australia.

3.3 Scope of this proposal

This proposal relates only to the importation and sale of Roquefort and raw milk extra-hard grating cheeses.

NZFSA has recently commenced development work on a raw milk cheese standard that would facilitate both the New Zealand production of raw milk cheeses (and potentially other raw milk products) and the importation of a wider range of raw milk products. The initial timeline of October 2008 to develop a standard for the production and importation of other raw milk products is dependent on the outcome of relevant scientific work. The timeline allows for consultation with industry, consumer groups and other interested parties. This work is excluded from the scope of this proposal.

4 Proposal for importation of Roquefort and raw milk extra-hard grating cheeses

4.1 Roquefort

4.1.1 Proposal

NZFSA proposes to allow Roquefort cheese to be imported directly on the basis of:

- Certification that attests it was produced according to the following:
 - The *Ministerial Order of 30 December 1993*, the *Ministerial Order of 18 March 1994*, the *Ministerial Order of 30 March 1994*, the *Ministerial Order of 28 June 1994*, the *Ministerial Order of 2 March 1995* issued by the French government as described in the table under Clause 5 (2) of the Food (Milk and Milk Products Processing) Standard 2007; and
 - EC Directive 2073/2005, which includes microbiological, food safety and process hygiene criteria.
- Monitoring in New Zealand to check that product meets *E. coli* microbiological criteria prescribed in the Food Standards Code (Standard 1.6.1);
- NZFSA currently has an education programme in place for young (children under the age of three), old (those over the age of 65), pregnant, and immunocompromised consumers collectively referred to as YOPI. This will be expanded to communicate the possibility of food-borne risks associated with consumption of Roquefort.

Verification that product meets the EC Directive 2073/2005 will be in line with the European Union (EU)/New Zealand (NZ) Sanitary Agreement. As a result, all consignments will be subject to 100% documentation checks at the New Zealand border. Certification may be verified by physical inspection and/or confirmatory testing and as per the Agreement. A separate monitoring programme will be put in place to monitor *E. coli* levels in Roquefort. Product will be released immediately following sampling, not held pending results. Any results that do not meet the EU or New Zealand *E. coli* standards will be assessed on a case-by-case basis to ascertain whether the product is safe for consumption, and will be discussed with the EC and managed as part of the EU/NZ Sanitary Agreement.

4.1.2 Assessment

The risk assessment of Roquefort cheese undertaken by NZFSA indicated that consumption of Roquefort would constitute a low risk to New Zealand consumers but a higher risk to some sectors of the population, namely YOPI consumers. YOPI groups are highly susceptible to some microbiological hazards that may be present in raw milk and there is a potential risk of acquiring illness from such hazards, if present, through the consumption of Roquefort cheese.

The risk assessment for Roquefort was used as the basis for NZFSA's proposed risk management decision (RM Decision) on the importation of Roquefort. The RM Decision can be found on NZFSA's website at www.nzfsa.govt.nz. The RM Decision takes into account other risk management factors such as relevant EU legislation as set by the European Commission (EC). NZFSA proposes to allow the importation of Roquefort with certification that attests to the cheese complying with EU legislation (including relevant microbiological criteria), and will also expand its education programme for YOPI consumers to communicate the risks associated with Roquefort and raw milk cheeses in general. A monitoring programme is proposed to measure *E. coli* levels in Roquefort. Importers will be responsible for covering the costs of sampling and testing of product.

It should be noted that while the risk assessment indicated that appropriate risk management measures applied to the production of Roquefort cheese would minimise risks to levels that can be found with other common food types e.g. raw shellfish, a low (unquantified) level of food-borne risk remains. It is also important to note that the mitigation factors recommended for Roquefort will not lower the risks associated with this cheese to the same level as pasteurised dairy products; raw milk cheeses are an inherently higher risk product compared to pasteurised cheeses.

4.1.3 Options considered

NZFSA considered the following options before making a decision on its proposal for the direct importation of Roquefort:

- *Option 1:* Direct importation allowed through changes to the Food Standards;
- *Option 2:* Status Quo i.e. Direct importation not allowed.

Further information on the analysis of these options is contained in Appendix 1. The RM Decision for Roquefort gives a summary of NZFSA's assessment of the food safety risks associated with Roquefort; both the outcomes of the risk assessment and factors other than

human health were considered for each option. This information was considered when making the proposed RM Decision for the importation of Roquefort.

4.2 Raw milk extra-hard grating cheeses

4.2.1 Proposal

NZFSA proposes to allow raw milk extra-hard grating cheeses to be imported directly without specific sampling and testing as these products pose minimal food safety risks. However, should relevant information become available in the future indicating that a monitoring programme is necessary, sampling and testing may be introduced.

4.2.2 Assessment

NZFSA does not have any food safety concerns in respect of these extra-hard grating cheeses and views their risk similar to that of the three hard Swiss cheeses currently able to be imported directly. Despite being sold in New Zealand for many years, extra-hard grating cheeses are unable to be imported directly to New Zealand from countries other than Australia. As a result, NZFSA proposes to allow extra-hard grating cheeses to be imported directly from any country.

4.2.3 Options considered

NZFSA considered the following options before making a proposed decision on the direct importation of raw milk extra-hard grating cheeses:

- *Option 1:* Direct importation allowed through changes to the Food Standards;
- *Option 2:* Status Quo i.e. Direct importation not allowed.

Further information on the analysis of these options is contained in Appendix 1.

4.3 Proposed Changes to the Food Standards

Allowing the direct importation and monitoring of Roquefort cheese and raw milk extra hard grating cheeses will require changes to be made to the New Zealand (Milk and Milk Products Processing) Food Standards and the New Zealand (Prescribed Foods) Food Standards. It should be noted that it is proposed to simplify the titles of these standards as requested by the Parliamentary Council Office. The Office has requested consistency in the titles of deemed regulations so that the deemed regulation has the same opening title as the principal Act it is made under. To comply with this request, it is proposed that the New Zealand (Milk and Milk

Products Processing) Food Standards and the New Zealand (Prescribed Foods) Food Standards be revoked and replaced with the newly named Food (Milk and Milk Products Processing) Standard 2007 and the Food (Prescribed Foods) Standard 2007.

The proposed changes are outlined in the following sections.

Food (Milk and Milk Products Processing) Standard 2007

Amending this standard to allow for the importation of Roquefort cheese and raw milk extra-hard grating cheeses would involve the following:

Roquefort cheese

Amending clause 5 (2), including inserting an additional entry in the table in this clause, to read as follows:

- “5. (2) Under section 11F of the Food Act 1981, these standards incorporate the:
- (a) Method set out in the *Ordinance on Quality Assurance in the Dairy Industry* of the Swiss Federal Council of 18 October 1995 as a method for Emmental, Gruyere or Sbrinz Cheese; and
 - (b) Produced in compliance with the *Ministerial Order of 30 December 1993, Ministerial Order of 18 March 1994, Ministerial Order of 30 March 1994, Ministerial Order of 28 June 1994, and Ministerial Order of 2 March 1995* issued by the French government **and** produced in compliance with European Community (EC) Directive 2073/2005.”

TABLE

Dairy product	Permitted methods of processing
Roquefort cheese	<p>Produced in compliance with the following Ministerial Orders issued by the French government:</p> <p><i>Ministerial Order of 30 December 1993 on requirements relating to the premises, equipment and operation of milk collection or standardisation centres and of establishments involved in the treatment or processing of milk or milk-based products</i></p> <p><i>Ministerial Order of 18 March 1994 on the hygiene of milk products and collection</i></p> <p><i>Ministerial Order of 30 March 1994 on the microbiological criteria that drinking milk and milk-based products must satisfy in order to be placed on the market</i></p> <p><i>Ministerial Order of 28 June 1994 on the identification and sanitary approval of establishments placing on the market animal foodstuffs or foodstuffs of animal origin and on health marking</i></p> <p><i>Ministerial Order of 2 March 1995 on the approval of milk collection, standardization or treatment centres and of establishments involved in the processing of milk and milk-based products</i></p> <p>and</p> <p>Produced in compliance with European Commission (EC) Directive 2073/2005</p>

“

Raw milk extra-hard grating cheeses

Amending clause 3 (d) and inserting a new entry into the table to clause 5 of the New Zealand (Milk and Milk Product Processing) Food Standards as follows:

“3. (d) The term “cheese treatment” means –

Method A

- (i) The rapid heating of milk or a milk product to be used in the manufacture of cheese to a temperature of not less than 64.5°C, retaining it at that temperature for not less than 16 seconds; and
- (ii) Storing the cheese prior to sale at a temperature of not less than 7°C for not less than 90 days from the date of commencement of manufacture;

or

Method B

- (i) the curd is heated to a temperature of no less than 48°C; and
- (ii) the cheese or cheese product is stored at a temperature of no less than 10°C for a period of no less than 6 months from the date of manufacture.”

Inserting the following new listing in the table in clause 3 to allow for new product and method of processing for cheese with a moisture content of <36%

TABLE

Dairy product	Permitted methods of processing
Extra-hard grating cheese (with a moisture content <36%) ¹	Pasteurisation Cheese treatment method A or B

¹ See the Codex International Standard for Extra Hard Grating Cheese (CODEX STAN C-35-1978)

Amending the following listing in the table in clause 3 to add in cheese treatment A for cheese with a moisture content of <36%

TABLE

Dairy product	Permitted methods of processing
Cheese with a moisture content < 39% moisture and a pH level < 5.6	Pasteurisation Cheese treatment method A

Food (Prescribed Foods) Standard 2007

Amending this standard to allow for the monitoring of Roquefort cheese and raw milk extra-hard grating cheeses would involve inserting the following into the table in Clause 6:

Food	Conditions
Raw milk cheese (cheese that has not been pasteurised or undergone cheese treatment according to the Food (Milk and Milk Products Processing) Standard 2007)	Pathogenic organisms

5 Questions and Submissions Form

Your view? Answering the following questions will help us with our analysis.

Name:

Address:

Please comment under the following headings:

1. The consultation process
2. Proposal for direct importation
 - Roquefort
 - Raw milk extra-hard grating cheese
3. Proposal to Amend the Food Standards
 - New Zealand (Milk and Milk Products Processing) Food Standards 2002
 - New Zealand (Prescribed Foods) Food Standards 2002
4. Any other comments.

Appendix 1: Roquefort Cheese: Analysis of options considered by NZFSA

Option 1: Direct importation allowed through changes to the Regulations

As outlined in the RM Decision, it is proposed that importation of Roquefort be allowed on the basis of:

- Certification that attests it was produced according to the following:
 - The Ministerial Order of 30 December 1993, the Ministerial Order of 18 March 1994, the Ministerial Order of 30 March 1994, the Ministerial Order of 28 June 1994, the Ministerial Order of 2 March 1995 issued by the French government as described in the table under Clause 5 (2) of the Food (Milk and Milk Products Processing) Standard 2007; and
 - EC Directive 2073/2005, which includes microbiological, food safety and process hygiene criteria.
- Monitoring at the border to check that product meets *E. coli* microbiological criteria prescribed in the Food Standards Code (Standard 1.6.1);
- NZFSA currently has an education programme in place for YOPI groups. This will be expanded to communicate the additional food-borne risks associated with consumption of Roquefort.

This option is NZFSA's preferred option and was selected for the following reasons:

- Official control of foodstuffs in France requires compliance with Ministerial Orders, which embrace European Union Directives that have been transposed into French law. It is proposed that the specific Orders that control the safety of raw milk and manufacture of Roquefort be included in the standard and on the certification required to accompany all consignments of the cheese. This ensures that product is produced according to the sanitary methods that were evaluated for the risk assessment of Roquefort.
- The microbiological criteria for *L. monocytogenes* contained in EU Directive 2073/2005 are the same as those in Standard 1.6.1 in the Food Standards Code and so Roquefort is produced under legislation that is similar to the criteria in place for manufacture of New Zealand cheeses.
- There are currently no EU microbiological criteria for *E. coli* and this increases the risk of product being contaminated with STEC and *Salmonella* spp. Introducing sampling and testing of all consignments of Roquefort cheese at the border to check that the *E. coli* microbiological criteria in the Food Standards Code are met will ensure that Roquefort imported into New Zealand meets standards similar to those in place for manufacture of New Zealand cheeses.

- As very few raw milk products are currently able to be sold in New Zealand, there is a lack of consumer awareness of the risks associated with their consumption; this exposes YOPI consumers to a higher level of risk compared to other consumers. Expanding the current education programme in place for YOPI groups will ensure they are alerted to the additional food-borne risks they may be exposed to by consuming Roquefort.
- Roquefort is currently able to be sold when imported from Australia. This option will allow cheeses to be imported directly and resolve this discrepancy.
- It will ensure that New Zealand meets its WTO SPS obligations as it recognises EU legislation applying to Roquefort for all relevant hazards except *E. coli* as providing similar protection as that provided by New Zealand sanitary legislation and does not impose any unnecessary additional requirements on the manufacture of Roquefort.

Option 2: Status Quo i.e. Direct importation not allowed.

Roquefort cheese should not be able to be imported as the risk assessment found that the mitigation factors recommended for Roquefort will not lower the risks associated with this cheese to the same level as pasteurised dairy products; raw milk cheeses are an inherently higher risk product when compared to pasteurised cheese.

This option was rejected for the following reasons:

- Roquefort has been found to be a low risk product for the general consumer. The risk assessment found that appropriate risk management measures would minimise the risks associated with consumption of Roquefort to levels that can be found with other common food types. These other food types e.g. raw shellfish, also pose a higher risk to YOPI consumers and the food safety risks associated with these products are communicated as part of NZFSA's YOPI consumer education programme.
- Roquefort can be sold when imported from Australia as allowed for under the TTMRA agreement. This puts New Zealand importers, who wish to import the cheese directly, at a disadvantage.
- It is unlikely to meet our WTO SPS obligations.

Raw Milk Extra-Hard Grating Cheese

Analysis of options considered by NZFSA

Option 1: Direct importation allowed through changes to the Regulations

This option is NZFSA's preferred option and was selected for the following reasons:

- Raw milk extra-hard grating cheeses have been entering New Zealand for many years but only when imported from Australia under TTMRA, this puts New Zealand importers at a disadvantage. This option will allow cheeses to be imported directly and resolve this discrepancy.
- There are no food safety concerns in respect of these cheeses; they are similar in risk to the three hard Swiss cheeses that are permitted under the New Zealand (Milk and Milk Products Processing) Food Standards and therefore able to be imported directly.

Option 2: Status Quo i.e. direct importation not allowed.

This option was rejected for the following reasons:

- There are no food safety concerns associated with the product.
- Raw milk extra-hard grating cheeses can be sold when imported from Australia as allowed for under the TTMRA agreement. This puts New Zealand importers, who wish to import the cheese directly, at a disadvantage.
- It will not meet our WTO SPS obligations.

Appendix 2 - Requirements and justification for amending Food Standards

Food Act 1981 sets specific requirements that must be met before making a Food Standard, including matters that the Minister must take into account and also be satisfied about. These are set out in Section 11E – Preconditions for issuing food standard. The justification as it relates to the proposal to amend the food standards to allow for importation and sale of Roquefort cheese and raw milk extra-hard grating cheese is in bold under each requirement set out below.

Section 11E Preconditions for issuing food standard

1. In issuing any food standard, the Minister shall take into account the following:
 - a. The need to protect public health;

Roquefort cheese: The risk assessment of Roquefort cheese undertaken by NZFSA indicated that consumption of Roquefort would constitute a low risk to New Zealand consumers but a higher risk to some sectors of the population, namely YOPI consumers. NZFSA proposes to allow the importation of Roquefort with the following risk management measures: certification attesting that product has been produced under relevant French Ministerial Orders and European Commission legislation, which sets microbiological criteria that are similar to the criteria in place for manufacture of New Zealand cheeses; a programme to monitor *E. coli* levels; and a communication strategy for those sectors of the population to which Roquefort poses a higher food safety risk. These requirements will ensure that the risks from consumption of Roquefort are minimised to levels that can be found with other common food types such as raw shellfish.

Raw milk extra-hard grating cheese: NZFSA does not have any food safety concerns in respect of these extra-hard grating cheeses and views their risk as similar to that of the three hard Swiss cheeses currently able to be imported directly.
 - b. The desirability of avoiding unnecessary restrictions on trade;

Both Roquefort and raw milk extra-hard grating cheeses can be imported from Australia under TTRMA but cannot be imported directly from any other country. This places unnecessary costs on importers wishing to import these products directly from countries other than Australia.
 - c. The desirability of maintaining consistency between New Zealand's food standards and those applying internationally;

Both Roquefort and raw milk extra-hard grating cheeses are able to be imported into many countries New Zealand trades with including Australia.

- d. New Zealand's obligations under any relevant international treaty, agreement, convention, or protocol, and, in particular, under the Australia-New Zealand Joint Food Standards Agreement;

The proposal to allow the importation of Roquefort arose from a request by the French Government. Allowing the importation of Roquefort and raw milk extra-hard grating cheeses is consistent with the EU/NZ Sanitary Agreement.

- e. Such other matters as the Minister considers appropriate.

The proposal is limited in impact and is in essence regularising what is already the de facto situation, Roquefort and extra-hard grating cheeses can be imported from Australia so are currently able to be sold and consumed in New Zealand.

2. The Minister shall not issue any food standard unless the Minister is satisfied that appropriate consultation has been carried out with respect to the food standard, including (without limitation)
-
- f. Adequate and appropriate notice of the intention to issue the food standard; and
- g. A reasonable opportunity for interested persons to make submissions;
- h. Adequate and appropriate consideration of any such submissions

Release of this public discussion document and the subsequent consideration of any comments received are intended to meet this requirement. Although the timeline for this consultation is relatively short, all potentially affected parties known to NZFSA are being directly advised of the release of this document. Further, the impact of the proposed changes are limited and in essence regularising what is already the defacto situation, in that Roquefort and extra-hard grating cheeses are currently sold and consumed in New Zealand, albeit via importation from Australia and not directly.