

Imported Food Requirements: Raw Milk Cheeses

From the 1st July 2009 NZFSA replaced this SMR with a standardised format for all Imported Food Requirements.

This version is obsolete. Refer to the current version.

1 INTRODUCTION

The imported food requirements for raw milk cheeses implements the Food (Prescribed Foods) Standard 2007, which allows for monitoring of raw milk cheeses for pathogenic organisms. The Food (Prescribed Foods) Standard can be found at:

<http://www.nzfsa.govt.nz/policy-law/legislation/food-standards/index.htm>

The following raw milk cheeses are currently permitted import into New Zealand: Roquefort, extra-hard grating cheeses and three Swiss cheeses (Emmental, Gruyere and Sbrinz).

2 BACKGROUND

2.1 Hazards

Roquefort cheese

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

NZFSA has conducted a risk assessment of Roquefort cheese which indicated that consumption of Roquefort would constitute a low risk to New Zealand consumers but a higher risk to certain vulnerable sectors of the population, namely children under the age of

three, the frail elderly, pregnant women, and anyone whose immune system may be compromised because of a chronic illness, long-term medication or a recent operation. These consumers (collectively referred to as YOPI consumers) 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.

Extra hard grating cheeses

Extra-hard grating cheeses from the European Community (EC) are made from raw milk 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 (stored at no less than 10°C for at least six months). 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.

Extra-hard grating cheese varieties produced in the EC include: Parmesan, Romano, Asiago and Montasio. They are generally made from cow or sheep milk and 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.

Swiss cheeses

Emmental, Gruyere and Sbrinz are traditional hard and very-hard Swiss cheeses made from raw milk. Australia allowed their importation following an assessment by the Australia New Zealand Food Authority (ANZFA), which has subsequently been renamed as Food Standards Australia New Zealand (FSANZ)). The assessment was in response to an application by the Swiss authorities and considered a microbiological risk assessment of the manufacturing protocol provided by the Swiss Federal Veterinary Office. The risk of human foodborne disease associated with the consumption of Swiss cheeses made from raw milk was assessed.

The hard and very-hard cheeses Swiss Emmental, Swiss Gruyere and Swiss Sbrinz made from raw milk were evaluated as posing no greater threat to public health and safety than that posed by cheeses made from pasteurised or thermised milk, based on microbiological parameters. These cheeses have low moisture levels (less than 39% moisture content) and are stored for very long periods (for at least 90 days and up to 360 days) and hence the

environment in the product is not conducive to the survival or proliferation of pathogenic micro-organisms. New Zealand subsequently reviewed the FSANZ assessment and amended the New Zealand (Milk and Milk Products Processing) Food Standards 2002 to allow for the importation of these three Swiss cheeses.

2.2 Management of Hazards

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 includes advice to avoid eating products made from raw milk. NZFSA also requires all raw milk cheeses to be labelled with a statement to the effect that the product has not been pasteurised.

Roquefort cheese

NZFSA's risk assessment for Roquefort was used as the basis for its risk management decision (RM Decision) on the importation of this cheese. 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 EC legislation, where all imports of Roquefort cheese must comply with the relevant EC animal health/public health standards and requirements. As recommended in the RM Decision, NZFSA's YOPI education programme includes specific advice on the risks associated with Roquefort and to avoid consuming this 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 foodborne 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.

Extra hard grating cheeses

NZFSA does not have any food safety concerns in respect of these extra-hard grating cheeses, manufactured in accordance with relevant EC animal health/public health

standards and requirements, viewing them as similar in risk to cheeses made from pasteurised milk.

Swiss cheeses

NZFSA does not have any food safety concerns in respect of these hard and very-hard cheeses manufactured in accordance with relevant Swiss standards and requirements, viewing them as similar in risk to cheeses made from pasteurised milk.

2.3 Review of import standard and requirements for raw milk cheeses

The import standard and requirements for raw milk cheese will be regularly reviewed as part of an ongoing programme reviewing all import standards and associated requirements.

In addition, 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 cheeses/products.

3 IMPORT CRITERIA

3.1 The import requirements contained in this document apply to the following products:

Roquefort cheese, Emmental, Gruyere and Sbrinz (Swiss cheeses) and raw milk extra-hard grating cheeses (EC)¹

¹ The Codex International Standard for Extra Hard Grating Cheese, CODEX STAN C-35-1978 standard for "extra hard grating cheese" includes some principal characteristics for this cheese which NZFSA apply to determine an 'extra hard grating cheese'. Examples include: Parmesan, Romano, Asiago and Montasio.

Note: These foods are targeted at the border using the New Zealand Customs tariff code system. The tariff codes currently targeted for monitoring under this rule are contained in **Appendix 1**. It should be noted that the targeted tariff codes are subject to regular reviews and may change in future. Importers importing raw milk cheeses covered by this standard under tariff codes that are not listed in **Appendix 1** should advise NZFSA as the targeted codes will need to be reviewed.

3.2 The import requirements contained in this document do not apply to the following products:

All products other than those listed under 3.1

4 IMPORT CLEARANCE

4.1 Generic Clearance Procedure

The generic clearance procedure can be found on the NZFSA website at:

<http://www.nzfsa.govt.nz/imported-food/clearance/index.htm>

This document details the clearance procedures and associated requirements for all food imported into New Zealand for human consumption. Additional requirements and / or changes to these procedures may apply to specific raw milk cheeses. Where this is applicable they are detailed in this document.

Clearance Procedure Specific to Roquefort: Pre clearance arrangement with the European Community

Roquefort cheese is a permitted import from the European Community (EC) under the New Zealand / EC Sanitary Agreement, which recognises EC sanitary measures (including food controls) for animal and animal products as equivalent to New Zealand requirements.

EC animal health/public health standards and requirements applicable to Roquefort cheese have been recognised as equivalent to New Zealand standards and requirements,

specifically, in accordance with Council Directive 64/432/EEC, Council Directive 2002/99/EC, Regulation (EC) N° 852/2004, (EC) N° 853/2004, (EC) N° 854/2004 and (EC) N° 2073/2005. New Zealand has conducted a direct assessment of the production of Roquefort and will conduct future audits to confirm effective implementation.

Clearance Procedure Specific to Emmental, Gruyere and Sbrinz (Swiss cheeses): Pre clearance arrangement with Switzerland

Emmental, Gruyere and Sbrinz cheeses are permitted imports from Switzerland under an agreement with the Dairy Industry of the Swiss Federal Council. Emmental, Gruyere and Sbrinz cheeses manufactured from raw milk and processed according to the method set out in the *Ordinance on Quality Assurance in the Dairy Industry* of the Swiss Federal Council of 18 October 1995 have been recognised as equivalent to New Zealand standards and requirements.

Clearance Procedure Specific to extra hard grating cheeses: Pre clearance arrangement with the European Community

Extra-hard grating cheese is a permitted import from the European Community (EC) under the New Zealand / EC Sanitary Agreement, which recognises EC sanitary measures (including food controls) for animal and animal products as equivalent to New Zealand requirements.

EC animal health/public health standards and requirements applicable to extra-hard grating cheese have been recognised as equivalent to New Zealand standards and requirements, specifically, in accordance with Council Directive 64/432/EEC, Council Directive 2002/99/EC, Regulation (EC) N° 852/2004, (EC) N° 853/2004 and (EC) N° 854/2004.

4.2 Raw Milk Cheese Pre clearance Arrangements

Pre clearance arrangements, which include the import of specific raw milk cheeses, exist with the following countries:

European Community (EC) and Switzerland.

Each arrangement is specific in terms of scope and import conditions.

See **Appendix 2** for details of pre clearance arrangements.

5 IMPORT CONDITIONS

Where a pre clearance arrangement is required for import of specific raw milk cheeses, as identified under **section 4.1**, the associated import conditions are detailed under each arrangement (see **Appendix 2**).

Where a pre clearance arrangement is not required for import of specific raw milk cheeses, as detailed under **section 4.1**, import conditions may apply as detailed below:

Nil

6 VERIFICATION MECHANISMS

6.1 Certification Checks

Raw milk consignments imported under a pre clearance arrangement must be accompanied by NZFSA recognised certification from the relevant competent authority, as agreed under each pre clearance arrangement, and are subject to 100% documentation checks unless otherwise stated in the arrangement with the exporting country.

6.2 Physical Inspections

Certification may be verified by physical inspection. Where a consignment is imported under a pre clearance arrangement the rate applied is specified in the pre clearance arrangement. See **Appendix 2**.

7 BIOSECURITY REQUIREMENTS

Biosecurity New Zealand has additional requirements for import of foods, including raw milk cheeses, into New Zealand. These requirements are necessary in preventing unwanted pests and diseases from reaching New Zealand, and for controlling, managing or eradicating them should they arrive. Importers should contact Biosecurity New Zealand directly to check their requirements – see www.biosecurity.govt.nz.

Obsolète

Appendix 1 – Tariff Codes Applying to Raw Milk Cheeses

Products Targeted:

Products classified with the following tariff codes are captured under this standard. However, if importers are importing raw milk cheeses permitted import under other tariff codes they are required to notify NZFSA as these targeted tariff codes may need to be reviewed.

Tariff codes targeted for permitted raw milk cheeses	
0406.20.00.01A	Cheddar Cheese Grated Etc
0406.20.00.09G	Colby Cheese Grated Etc
0406.20.00.11J	Cheshire Cheese Grated Etc
0406.20.00.19D	Egmont Cheese Grated Etc
0406.20.00.21F	Gouda Cheese Grated Etc
0406.20.00.29A	Other Cheese Grated Etc
0406.90.00.01G	Other Cheese In Tins
0406.90.00.39D	Other Cheese Other
0406.40.00.00L	Blue-veined cheese and other cheese containing veins produced by <i>Penicillium roqueforti</i>

Appendix 2 – Country Arrangements Listing for Raw Milk Cheeses

The countries listed below have a pre clearance arrangement with NZFSA which recognises the country's production of specific raw milk cheeses as complying with or equivalent to New Zealand's BMS requirements.

European Community

(Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, The Netherlands, United Kingdom)

'EC /NZ: Council Decision on Sanitary Measures Applicable to Trade in Live Animals and Animal Products'. Signed: 17 December 1996.

Products included under this Agreement:

- Roquefort and raw milk extra-hard grating cheeses.
- Covers Roquefort and raw milk extra-hard grating cheeses originating and exported from the EC.

Specific requirements:

- Agreed certification issued by competent authorities of EC member states must accompany all imported consignments. See <http://www.nzfsa.govt.nz/imported-food/eu-nz-vet/index.htm> for:
- Copy of agreed certification; and
- Certification requirement; and
- Verification requirements.

Importers of Roquefort and/or extra-hard grating cheese from the EC must apply for a Multiple Release Permit (MRP) to facilitate the clearance process.

Contact: Advisor (Food Service Sale and Import), Approvals Group, NZFSA

Ph: 04 894 ~~2680~~ or 04 894 26442500

ben.leen@nzfsa.govt.nz or natalie.watson@nzfsa.govt.nz

Switzerland

Products included under this Agreement:

- Gruyere, Sbrinz and Emmental cheeses manufactured from raw milk.
- Covers Gruyere, Sbrinz and Emmental cheeses originating and exported from Switzerland.

Specific requirements:

- Switzerland Sanitary Certificate for the Exportation of Cheese and Butter (Approved form # L-9903) attesting compliance with The Dairy Industry of the Swiss Federal Council (only for Gruyere, Sbrinz and Emmental cheeses manufactured from raw milk).