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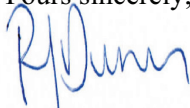
24 February 2010

Dear Sir/Madam,

Re: P1007 – Primary Production and Processing Requirements for Raw Milk Products

On behalf of The Agrarian Kitchen cooking school please find attached our submission in response to P1007 – Primary Production and Processing Requirements for Raw Milk Products.

Yours sincerely,



Rodney Dunn
Director

P1007: Primary Production and Processing Requirements for Raw Milk Products

Overarching questions:

The overarching scope of the Proposal is assessing the safety of raw milk products using the Category Framework. FSANZ has undertaken a Technical Assessment based on three Risk Assessments (Raw Cow Milk, Raw Goat Milk and Raw Milk Cheese), a Consumer Study and Nutrition Assessment – Can you identify any aspects we have not covered at this point?

The Proposals exaggerate the risks of raw milk products.

They state that “Because of the potential for raw milk to be contaminated with pathogens, raw milk and products made from raw milk present a high level of risk to public health and safety if there are no control measures to manage the microbiological hazards that may be present.”

It is a false assumption that the risks are “high level” for raw milk products. A more realistic description for raw milk products is “they present an additional risk to public health and safety compared with products made from correctly pasteurised milk”.

We have summarised the impacts by option in Table 1 in the Report. Do you have any comments on the overall assessment? Can you identify other benefits and costs to the affected parties?

For raw milk cheese, the overall assessment seems to be far more alarmist than the technical assessment suggests. I consider that the technical assessment indicates that all soft cheese should be placed in Category 2, reserving Category 3 for raw drinking milk alone.

Consumers:

Would Australian consumers benefit from a greater range of cheeses and dairy products? Please provide details.

When referencing other cheese producing cultures the range available in Australia is paltry, a quick look around any quality cheese providore will show that a small amount of cheese is Australian and the majority from France, Italy and Spain. Even though these cheese are all made from pasteurised milk due to current regulations I believe that regionally produced raw milk cheese would give quality and variety to the Australian consumer that has been lacking. I believe that a strong cheese culture would also attract international attention and result in rejuvenation of regional areas through jobs and tourism.

FSANZ has received comments that raw milk cheeses are likely to be gourmet, high-end market products. Costs associated with ensuring the safety of products may also be passed on to the customer - if raw milk cheeses were permitted:

- How much would you be willing to pay for such cheeses?

As consumers ourselves I would definitely pay a premium price for a raw milk cheese, I have consumed them in other countries and from a flavour perspective find them superior to their pasteurized milk counterparts.

- Are you willing to pay more than the cost of current gourmet cheeses?

Yes, I would be willing to pay more for raw milk cheese if the costs were warranted with quality

- Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?

Yes, I understand the importance of safety tests involved with keeping these cheese on the market, I also think that as adults we should be able to decide for ourselves if we would like to consume these cheese and not have the decision made for us due to bans on raw milk.

- Would you choose to purchase an Australian raw milk cheese over an imported equivalent?

I am a strong believer in supporting locally made products, particularly food over any other, I personally think Australia has a lot to offer in terms of cheese to the rest of the world and it's our cheese culture, including both industry professionals such as young cheesemakers and the consumer would be buoyed by a decision that would allow the production of raw milk cheese.