

Seamons, Colleen

From: Bill & Bettina Douglas [w_b_doug@bigpond.net.au]
Sent: Tuesday, 9 February 2010 8:05 PM
To: submissions
Subject: Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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Overarching questions:

- 1) 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”.

It is my experience that with the public education about the health risks to certain groups (such as pregnant women), these groups voluntarily avoid raw milk products.

- 2) 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:

- 3) Would Australian consumers benefit from a greater range of cheeses and dairy products? Please provide details.
Yes. I grew up in Europe and as a child was exposed to a much greater variety of cheeses and dairy products than is available even today in Australia. My Swiss ancestors were dairy farmers and made their own dairy products for home consumption. For me it is a great loss culturally that I have not been able to share this heritage and the experience of authentic dairy products with my Australian born partner & family.
(I would add that my Swiss mother was meticulous about food safety and while there were many foods that we were taught to treat with caution, cheese was never one of those. And she was definitely of the era where herds of cows were routinely tested for TB.)
While there has been progress in the last 40 years, a lot of Australian cheese still is as about as interesting to eat as the plastic wrap it is packaged in.
- 4) 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:
 - a. How much would you be willing to pay for such cheeses?
Currently such cheeses can retail for about \$100 / kg. This is not “everyday food” for me, but for special occasions and treats I will certainly spend that sort of money.

- b. Are you willing to pay more than the cost of current gourmet cheeses?
Yes - if it is good quality
- c. Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?
This question implies these products are not currently safe and I do not agree that is the case.
- d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent?
If it is equivalent. At the moment that is hard to find because of the restrictions on raw milk.