

## Seamons, Colleen

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**From:** Oliver McDonnell [omcdonnell@keystonehospitality.com.au]  
**Sent:** Monday, 22 February 2010 12:56 PM  
**To:** submissions  
**Subject:** Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

**Categories:** Blue Category

*Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products*

*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".*

*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.*

**Oliver McDonnell**

**Business Development Manager**

SHORTYS LIQUOR MERCHANTS

**DIRECT:** 02 9552 4763 **MOB:** 0410 586 061 **FAX:** 02 9552 4780