

Seamons, Colleen

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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

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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?

I believe the Proposals exaggerate the risks of raw milk products and do not give enough choice to cheesemakers and the general public to decide for themselves if they wish to make/buy raw milk and cheeses.

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”.

I do not see why raw milk cheeses and milk production for human consumption cannot meet sensible food safety standards

- 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.

I know several Australian cheesemakers who deserve the choice to make and sell raw milk cheeses. I know two dairies which I believe would supply raw milk safe for human consumption.

Consumers:

- 3) Would Australian consumers benefit from a greater range of cheeses and dairy products? Please provide details. YES. Consumers deserve to have a/ the choice b/ the education in traditional cheesemaking methods and characters c/ the broadening of the Australian cheesemaking profile
- 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? As much as it is worth for specialist cheesemakers to make them
 - b. Are you willing to pay more than the cost of current gourmet cheeses? As much if not more than I currently do
 - c. Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products? YES
 - d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent? Sometimes but I do not believe there are currently the comparative cheeses in which to do so. I believe that the opportunity to buy locally made raw milk cheeses will encourage me to buy more locally because my interest will be greater and the range may be better.

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