

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?

There is definitely a higher risk of contamination, but concerns to us are

1. The costs of pathogen testing will rise above the current high levels.
2. If consumption of raw milk led to a Listeria infection and consequent illness, the flow on effects to the rest of the dairy manufacturing industry and public perception would be enormous. Adverse publicity would impact severely on all the small manufacturers who do not have the resources to undertake publicity campaigns to rectify perceptions.

- 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?

Australian manufacturers cannot be compared with European artisan manufacturers as our conditions are different, our climate is different, our travel distances and consumption times are different also. We note that 96% of French cheeses are now made from pasteurized milk as the French recognize that consumers have changed from local populations to a far wider range of consumers.

Soft cheese is the perfect medium for any pathogens to grow and multiply, and the conditions for ripening soft cheese are also perfect for pathogen growth, so they should remain in the same category as drinking milk.

There is already far too much emphasis on imported cheese and the flavours of raw milk cheeses. We believe that the flavours of Australian cheeses can be just as interesting and they are created by artisan cheesemakers using the same cultures that are used worldwide.

As small cheese producers, we would be financially devastated if there was a public case of illness due to eating cheese with pathogens. The resulting publicity would have a devastating effect on cheese consumption.

We believe that the push to have raw milk cheese is only to allow more imported cheeses to come into the country unnecessarily as Australia currently makes a wonderful range of fabulous cheeses.

**Consumers:**

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

No. The range is already enormous, and most consumers would not be able to differentiate between cheeses made from raw or pasteurized milk

- 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? Nil.
  - b. Are you willing to pay more than the cost of current gourmet cheeses?  
I do not believe that many consumers would actually pay the extra amount.
  - c. Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?  
Of course there would be significant added costs.

- d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent?  
This question is quite irrelevant as imported raw milk soft cheeses are currently unavailable, so consumers would have no point of reference to make an informed judgement between the two cheeses.