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Sent: Tuesday, 23 February 2010 1:11 PM
To: submissions
Subject: Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

Categories: Blue Category

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.

Consumers:

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

I think not only would Australian's benefit economically from cheeses made here, they would also be able to be better educated in processes (able to actually visit a dairy farm where these cheeses are made) as well as encouraging diversification within the dairy sector for artisans to produce the cheeses.

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?

It would depend on the quality. For good cheese, money is not an object. Nothing is worse than badly made cheeses.

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

Yes

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

yes, but I think people do over react to the perceived health risks of raw milk. I drank it in Europe and found it tasted better than pasteurised milk and didn't suffer any ill effects.

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

Yes.

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