

## Seamons, Colleen

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**From:** Meera Stretton [m\_e\_stretton@hotmail.com]  
**Sent:** Thursday, 11 February 2010 12:23 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  
By Meera Kapoor, BSc (Macquarie University), stay at home mother of two, 7 The Broadway Wahroonga NSW 2076, (02) 9943 3933, [m\\_e\\_stretton@hotmail.com](mailto:m_e_stretton@hotmail.com)

### **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”.

The safety of raw dairy products is a very valid food safety issue. During the early 20th century, many diseases such as Tuberculosis and Bruscullosis occurred because of inadequate dairy processing. However, at this time primitive sanitation practices were in place. There was no use of stainless steel, no refrigeration, no safety testing and in most cases, the cows were not optimally cared for.

Unpasteurised and unrefined milk is rich in enzymes and essential bacteria. It is vitamin and mineral rich and has powerful immune-boosting properties. Pasteurisation significantly reduces the levels of vitamins and minerals in the milk. Furthermore, the delicate enzyme proteins and essential bacteria are denatured and destroyed. The lack of enzymes in the final pasteurised milk product renders the milk indigestible for many people.\*

\*Raw Milk Australia

- 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.

There is a large range of dairy products available to Australian consumers already, however, raw milk cheese and other raw dairy products cater to a separate market - those who are conscious of the health risks associated with consuming pasteurised dairy products and the benefits of consuming raw dairy products.

- 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?

I would be willing to pay up to \$100/kg for raw milk cheese, depending of course on the type of cheese.

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

Yes. Absolutely.

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

Yes. Correct refrigeration, transportation, etc is vital in ensuring that a safe product is delivered to the consumer.

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

If the quality was as good or better than the imported equivalent, then yes. I would select an organic, biodynamic cheese above a non-organic, non-biodynamic alternative. However, I think that imported equivalents should also be available. For example, France has a long history of producing raw cheeses and it is a shame that the Australian dairy market is currently deprived of what they have to offer.

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