

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?

The Proposals exaggerate the threats posed to public health by raw milk products; claiming that they are in the "high" category. As a member of the NSW Dairy Goat Association I can personally vouch that the risks posed by raw milk are simply an additional consideration when handling the product. It is a matter of good farm sanitation and falls in line with the same management practices as the handling of other raw products such as meats and offal.

- 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?

In terms of Option 4, allowing for Category 1, 2 & 3 products I believe that the cost concerns have been over-simplified in the negative sense, particularly in terms of consumer education. Sold alongside pasteurised products, consumers will be given the choice and it is likely that only those who have already honed out of the way to educate themselves on the risks versus the benefits will choose the raw product. The cost of a labeling exercise warning of a possible risk would not add greatly to the shelf cost of such products and would not be setting any new precedent in Public Health in Australia as products such as cigarettes are sold with warnings of the health risks involved in their use. There is no reason that Australia couldn't follow the example of England's "green top" producers with the equivalent warning system.

Any "costs of additional requirements to produce Category 2 or 3 products" would be more than offset by the demand for such products and the willingness of consumers to pay a higher price for what they consider a higher-value product. The "increased risk to public health and safety" does not take into account the anecdotal evidence of health benefits derived from the consumption of raw milk.

Consumers:

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

I believe so - both in terms of a greater range of choice, flavour and potential health benefits.

- 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 twice the price of the equivalent pasteurised cheese.
 - 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?
Of course.
 - d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent?
Yes.