

Seamons, Colleen

From: Lucinda Unsworth [Lucinda.Unsworth@CrescendoPartners.com.au]
Sent: Monday, 22 February 2010 2:16 PM
To: submissions@foodstandards.gov.au
Subject: Submission regarding Proposal P1007 - Primary Production and Processing Requirements for Raw Milk Products

Categories: Blue Category

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From: Lucinda Unsworth
Sent: Monday, 22 February 2010 2:13 PM
To: 'submissions@foodstandards.gov.au'
Subject: Submission regarding Proposal P1007 - Primary Production and Processing Requirements for Raw Milk Products

Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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?*

- Yes absolutely. Australia seems to lead the world in terms of variety and quality of produce in virtually every area, with the notable exception of cheese (and perhaps salumi). In comparison to European unpasteurised cheeses, the cheese here is bland and tasteless; and because of a lack of viable alternatives, it is also very expensive – Australian gourmet cheeses are often almost as expensive as their imported counterparts, which are infinitely tastier. Allowing raw milk cheese production in Australia would give consumers much better access to excellent local cheese and do away with the need to consume expensive imports, benefitting the Australian economy, and enabling consumers to choose the green option and shop locally.

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?

- *If the quality / taste matched that of imported cheese, I would be willing to pay equivalent prices (usually \$65 / kilo upwards)*

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

- *I don't really buy Australian gourmet cheeses anymore as they are just not good. Instead I eat less cheese and when I am really craving it, I buy imported (against my green principles!)*

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

- *Yes – if it enabled me to buy good local cheese*

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

- *Yes – see answers above*