

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 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. Yes they would. Australians deserve choice and the right to make that choice. This is not just about access to premium cheeses but a reaction against over-regulation being exercised with little or no discernible benefit.
- 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 do not accept that costs would rise significantly, as increased supply will have a proportionate effect on demand and therefore price. Shipping costs per unit will also decline.
 - b. Are you willing to pay more than the cost of current gourmet cheeses? Yes but again, see above.
 - c. Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products? I would expect the responsible authority to execute their orders more effectively. As far as the industry is concerned, I would expect them to pass on their savings (as discussed above) as well as the added costs, which would hopefully lead to a neutral price effect.
 - d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent? Absolutely. I have a strong desire and ability too support local product and believe in the quality of primary ingredients produced in Australia. Australia also has the capacity to become a leading producer of equivalent products as well as the potential for creating unique products for domestic and export markets. Surely this would also decrease the risk of introducing foreign microbiological hazards to the local palette.