

Seamons, Colleen

From: Eat & Drink [admin@eatanddrink.com.au]
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Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

by

Christopher Hayes

Proprietor Eat & Drink (www.eatanddrink.com.au) – the leading quality-based directory for fine food & wine in Australia

465 Dryburgh Street, North Melbourne Vic 3051

t. 0412 377 596

e. hazi@eatanddrink.com.au

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 study states 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.”

This assumes that there will be no control measures (and therefore it becomes a spurious assumption) which would seem unlikely considering the measures already in place for pasteurized milk.

Also this, and the accompanying data (mostly from periods when health issues were vastly different to the 21st century), greatly exaggerates the risks of raw milk products.

There is not enough evidence (especially contemporary) for the assumption that the risks are “high level” for raw milk products. There may be an additional risk to public health and safety compared with products made from pasteurized milk, but not enough not to allow the public to choose. Labelling, as mentioned with reference to raw milk used, should be adequate. The “au lait cru” on French cheeses is what is sought after by most lovers of fine cheese – not a deterrent – but it also allows the public the option to avoid.

- 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?

The overall assessments seems to be far more alarmist than the technical details would dictate. There would seem little weight to the argument to include all soft cheese in Category 2.

And Option 4 is not a scary thing. Clear labeling as defined in Section 2.2.2 would seem sufficient to advise the consumer. If necessary for Category 3 provide a health warning. Cigarettes are far more dangerous to health but are legal and labeled to warn the consumer.

Consumers:

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

The dairy scene in Australia is boring compared to most other countries. One of the great delights of travelling is the choice offered, and the immediate search for a fine artisanal St Marcellin, Cheddar or Stichelton depending on the country visited. Foodie visitors to Australia are often surprised by the lack of fine local quality dairy offerings from such a strong agricultural country. It's also a telling point that the consumers of the "black market" products of your report are also those that buy the finest (often organic) quality fruit, vegetable and meats.

- 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?

The cost of raw milk cheeses overseas is not that much more than pasteurized, and there is little evidence to support that they should be as there are already controls in to protect those products. However the market will quickly dictate whether producers should do so.

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

If the quality and flavour is there (and it is in raw cf. pasteurized cheese overseas) ... absolutely!

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

Refer back to point a., there should be little, if any, significant additional cost unless there was a major attempt to make it prohibitive, which would be transparent. Reasonable extra costs would not be a problem.

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

Quality rules! But local always gets the nod on an even playing field.

Let us choose. We (well, not me for the former) smoke, drive cars, and lie in the sun – all more dangerous than consuming raw milk produce – and are warned of the dangers.

And I've seen more dangerous things in supposedly good restaurants than a piece of raw milk cheese.

Yours sincerely,



Christopher Hayes
Eat & Drink



www.eatanddrink.com.au

www.eatanddrink.co.nz

www.eatanddrink.com

t. +61 412 377 596