

Seamons, Colleen

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To: submissions
Subject: "Submission regarding Proposal P1007 - Primary Production and Processing Requirements for Raw Milk Products"

Categories: Blue Category

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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.

include and answer below if you wish, otherwise delete

Consumers:

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

Yes. The cheese industry and gastronomic culture in Australia is extremely behind other parts of the world because of restrictions to produce a wide variety of cheeses that have been tried and tested over centuries. There are so many diverse cheeses in Europe, from one region to another one can find a plethora of cheeses and with it a thriving gastronomic culture, business and happy bellies.

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 have been living outside of Australia and cannot remember cheese prices, so no comment here.

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

Yes I would be happy to pay more if I knew that I was paying for something that increased the quality of the cheese.

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

Yes. Having tasted many cheeses in Europe that are made from raw milk and being a daily consumer of raw milk I am a big believer in the increased quality that can be achieved and the diversity of cheeses that can be made using raw milk.

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

A difficult question. Having lived and spent a lot of time visiting producers in Italy and other parts of Europe I can see the value of an imported product. There are some cheeses that have been perfected over many centuries and have been passed down through generations. Not only that but the land itself has been cultivated for such products and the products have also been created from conditions of the land (terroir). It would be nice to see Australian cheese makers developing new cheeses that work for the Australian landscape and for the consumers. However, I would be open to choosing an Australian raw milk product if it was as good or superior to its imported equivalent. In making cheeses such as parmesan in Australia, I think it would be important to create a standard of quality.

Your email will help:

allow the import of certain raw milk cheeses into Australia; allow cheese producers in Australia to make and sell raw milk cheeses such as parmesan, gruyere, raclette, morbier (among others!).