

From: Roberta Muir [roberta@food-wine-travel.com]
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To: submissions
Subject: Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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

By Roberta Muir (Master of Arts, Gastronomy) Freelance Food Writer and Manager of Sydney Seafood School
16 Epping Drive, Frenchs Forest NSW 2086
+61 412 159 656 (fax +61 2 9975 6590)
roberta@food-wine-travel.com

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.

They would benefit from an educational point of view by being able to buy imported benchmark cheeses made from raw milk so that they could better assess and understand Australian cheeses (e.g. how can they know what 'brie' is meant to taste like if they have never been to France and tasted real brie). They would also benefit from being able to buy Australian-produced cheeses of equivalent standard to the European raw milk benchmark cheeses.

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?

This is impossible to answer in terms of a dollar figure (\$100/kg or more I expect), as it depends on production costs plus a reasonable mark up. I currently pay a premium for imported cheeses such as Roquefort, I would prefer to be paying a premium for quality Australian raw milk cheeses.

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

Yes - these cheeses will naturally cost more given the added costs involved. It is important to note however that people who choose not to pay more will still have access to pasteurised milk cheeses.

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

Yes - these cheeses will naturally cost more given the added costs involved.

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

Yes - if it is of the same quality. The point is for consumers and producers to have easy access to European benchmark cheeses by allowing the importation of raw milk cheeses so that producers can learn to make cheeses of equivalent quality and consumers can have a benchmark against which to assess such Australian-produced cheeses. Over time Australian producers will develop their own unique products which can stand alongside the great cheeses of Europe (as has happened with the Australian wine industry).

Roberta Muir, MA (Gastronomy)

Jetstar Inflight Magazine, Food & Beverage Writer
Sydney Seafood School, Manager

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