

Seamons, Colleen

From: Amanda Flynn [amanda@aureamanus.com]
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Subject: Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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

By Amanda Flynn

Director *Saabi on Manson* (a food services business)

116 Manson Road Hendra QLD 4011

ph 07 31133636 fax 07 3503 9095

amanda@aureamanus.com

I fully support the adoption of the legal option for consumers to source and consume unpasteurised milk products including (in this instance) raw milk cheese products. In response to the primary overarching questions posed in the FSANZ inquiry please see my responses below:

- 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 Question Responses :

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

Yes. After living in the United States and Europe I am still amazed that Australian consumers are prohibited from sourcing raw milk cheese and other dairy products. This seems an outdated legislative approach considering the adoption of the strict pasteurisation processes served an earlier and far less technologically adept time in our food production and processing history.

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 would be happy to pay a premium as I consider raw milk products to be superior to pasteurised milk products.

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

I would certainly appreciate the opportunity to make that decision based on having the choice to do so, and again believe I would ordinarily opt for a raw milk product over its pasteurised counterpart, so yes.

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

As I assume there are also costs associated with pasteurising raw milk product to produce any dairy product at the moment I would assume any the additional cost created in ensuring the safety of raw milk products would be offset somewhat. However, yes - I would be prepared to pay more to make raw milk products available.

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

Certainly.

Sincerely,

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Amanda Flynn
Saabi on Manson
116 Manson Road
Hendra Q 4011

P 07 3113 3636

F 07 3503 9095