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To: submissions

Categories: Blue Category

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.

Australian consumers would benefit from a greater range of high-end, locally produced cheeses and dairy products. Whilst raw milk products are unlikely to have mass market appeal they would certainly benefit the gourmet sector, and possibly even encourage more food tourism associated with these products.

- 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 pay over \$100 per kg for some imported cheeses. I would place quality Australian raw milk cheeses in a similar category.

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

Yes, for product of sufficient flavour and quality.

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

Yes, for product of sufficient flavour and quality.

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

Yes, for product of sufficient flavour and quality.

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