

SCANNED

ACKNOWLEDGED

218 Mahons Road
Coominya Qld 4311

21 February 2010

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

ENTERED IN SMS / C
...../...../.....

Dear Sir / Madam

Submission – Proposal P1007 – Primary Production and Processing Requirements for Raw Milk Products (Australia Only)

I have read the First Assessment Report on the above and wish to provide comment as follows.

At the outset, I acknowledge it is difficult to balance the protection of public health and safety and the basic right of freedom of choice when addressing the sale of raw milk and raw milk products. Accordingly it is imperative there is the provision of adequate information, which enables consumers to make informed choices about the food, they eat.

At this point in time I am tending to support option 3 (to allow for the production and import of raw milk products that meet the definition of Category 1 and 2 products into Australia) and look forward to having this Proposal progressed to the Second Assessment stage.

I acknowledge this option provides for more alternative processing measures for dairy product manufacture without compromising public health and safety and will allow a greater range of raw milk products to be produced and imported into Australia. This will benefit Australian producers who wish to produce cheeses of similar style to the three Swiss cheeses and French Roquefort currently permitted in the Code and will present the Australian consumer with a greater range of raw milk products in the marketplace.

However I still see problems for industry, consumers and government with option 3, since there is obviously a consumer demand for raw milk and raw milk products and this will not disappear with the acceptance of the above option.

Although the demand for raw milk appears to be small, it also appears to be increasing. To address this issue, perhaps there need to be measures put in place which allow these sales to occur safely. Accordingly, consideration may need to be given to allowing producers to sell clearly labelled raw product (in a frozen state), only after they have demonstrated they have a safe product. This would necessitate them holding all product until clearance testing by a laboratory.

Such a requirement has the potential to encourage current suppliers of black market product into a regulated market since they could then openly sell their product. It would also have the potential to enable better enforcement where a supply of raw milk by a non-accredited producer continues to occur or occurs in non-compliance with specified requirements.

Although this would involve the producer incurring significant costs, particularly those associated with storage and testing, it might also result in the product commanding a premium price. It might also result in a "shake out" of those producers who continually produce a product; which fails to meet an acceptable standard.

It would be appreciated if consideration was given to the above suggestion.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Maree Bachmann".

Maree Bachmann