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Sent: Wednesday, 10 February 2010 7:04 PM
To: submissions
Subject: FSANZ Submission

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 which have been produced in other countries for centuries with minimal risk – no risk provided the products are produced to recognised international HACCP guidelines

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, subject to being produced to recognised international HACCP guidelines

Category 3 should be reserved for raw drinking milk alone.

Consumers:

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

Yes .

- a larger diversity of products available at Farmers Markets
- food miles for products will be reduced
- regional food availability expanded

- 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?

Up to the top end of the market price for specialist cheeses ie \$35 to \$50 per Kilo

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

Yes - depending on the product - expect to pay top rates for a 1st class product

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

Yes - depending on the product - expect to pay top rates for a 1st class product

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

Yes – Every time. In fact think that a carbon tax should be placed on imported food products