

From: Richard Gardiner [richardgardiner@aapt.net.au]
Sent: Monday, 15 February 2010 10:45 PM
To: submissions
Subject: Submission regarding Proposal P1007

Categories: Blue Category

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

By:
Richard Gardiner
Solicitor
101 Pascoe Street
Mitchelton QLD 4053
p 073855 9772
e richardgardiner@aapt.net.au

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.

Regards,

Richard Gardiner

[food bling, Brisbane](http://www.foodblingbrisbane.blogspot.com)
www.foodblingbrisbane.blogspot.com