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Australian Government

Food Standards

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Dear Sir/Madam

Please find following our Submission regarding Proposal P1007 - Primary Production & Processing Requirements for Raw Milk Products.

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 pasteurized milk".

Speaking from a dairy farmer's point of view, if you follow a good Quality Assurance programme and have clean, healthy animals there should be no reason why raw milk should not be fit for human consumption. I don't see too many farmers dying or being ill from drinking their own unprocessed 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.

Yes consumers would greatly benefit from a greater range of raw cheeses and dairy products. I believe that it is the consumer's freedom of choice if they wish to purchase and consume raw milk and raw milk products. Studies have shown the nutritional benefits of consuming good quality raw milk and raw milk products as compared to over processed foods.

- 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:

Yes raw milk cheeses will more than likely belong to a niche market because of their flavour but I don't believe they should be extremely high priced by over the top standards and testing. Nutritional value should be the governing factor. A special processors license should be issued to businesses and farmers wishing to supply raw milk and raw milk cheeses with a realistic annual audit.

- a. How much would you be willing to pay for such cheeses?

I would be willing to pay more for a good quality cheese at the markets, direct from its manufacturer but as stated earlier this decision should not be made on how much we pay but about nutritional value and flavour. I believe all consumers should have this choice not just the rich who can afford the high prices.

- b. Are you willing to pay more than the cost of current gourmet cheeses? **No**

- c. Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products? **No, Why? The current Quality Assurance Program and HACCP guidelines used for producing milk should be adequate to cover safety as the risks are highly exaggerated. We need a minimal but effective regulation on primary production and processing standards not an exaggeration. Farms producing milk for raw milk sales and raw milk cheeses should be specially licensed to do so through the DPI.**

- d. Would you choose to purchase an Australian raw milk cheese over an imported equivalent? **Most Definitely! Consumers deserve to have the choice like they have overseas not only to consume raw milk cheeses but raw milk also, if they wish!**

Australian consumers, Australian Cheese makers and Australian Raw Milk producers deserve the opportunity to enjoy a complete range of raw milk products.

On the ground facts.

We have no scientific evidence to support the sale of raw milk but we know the facts are that there is an unprecedented number of every day mum and dad consumers (not radicals) looking to purchase raw milk (fresh, unprocessed foods in general). Many of them with antidotal stories of the benefits of consuming raw milk. These people are prepared to go to extraordinary lengths and pay premium prices to secure raw milk. If this enquiry is not prepared to recognize these facts and recommend a change in legislation to allow the sale of all raw milk you will only create opposition.

I can tell you that the consumer is sick and tired of government regulators telling them what they can and can't do all in the name of consumer protection. If our elected members are not prepared to recognize this WORLD WIDE consumer driven revolt they do it at their own peril. On longer does the average elector take for granted that our politicians and their advisers know what is best for us. They have the power to do their own research and choose what is best for them. I think this is called freedom of choice.

It would surely make sense to put in place rules and regulations to allow the consumer their right to choose what foods they consume at their own risk. E.g. Labeling. All raw milk and products carry a government health warning "This product has not been heat treated and may contain organisms harmful to health" Let the consumer make the choice.

Yours Sincerely
Greg and Wendy McKenzie