

11 February 2010

Nick Katin

184 Townshend Road
Subiaco WA 6008

0893823612
sickandnue@amnet.net.au

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 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.

Of course! The world has changed since 1996. With some many Australians travelling to Europe, they see and taste Cheeses that are not available here due to too stringent health rules. Our cheeses cannot compete in flavour as it is not a level playing field. With globalisation we as the Australian consumer should have the choice of flavoursome cheese that is available in other parts of the world.

- 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?

That cannot be quantified not do I think it will come to that as if Australian cheese makers were allowed to compete and make cheese from raw milk it would open up competition.

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

Yes, but see a.

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

Yes, but again see a.

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

If it had the flavour I was looking for and as good or better then yes.