

emailed to submissions@foodstandards.gov.au 10/02/2020

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

By Jill Dupleix

Food columnist and author,

Sydney Morning Herald & The Age & delicious magazine

Unit 7,18 Macleay Street, Potts Point, NSW 2011 Australia

Tel 02 9356 3264 Mobile 0406 678282

jill@jilldupleix.com

Initial comment:

I fully support the right of all Australians to choose, buy, make and eat raw milk cheeses of the kind that have nurtured generations of people in the great food nations of the world.

The fact that we cannot currently import, make and enjoy these cheeses in all their diversity is holding us back from being an important food nation ourselves.

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.**

Absolutely they would, as they have every time the bar is raised and the palate is taken on interesting and intriguing taste journeys. We learn from experience what we like and enjoy, and one of Australia's greatest promises to us is the diversity of opinion, taste and style that we are faced with every day.

- 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?**

I would be willing to pay a premium for such cheese as I would be for any artisanal, or quality product.

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

I would pay more for it if I thought that would make a difference and ensure that we are given the choice of raw milk and pasteurised cheeses.

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

I assume there will be added costs and am prepared to pay more.

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

Yes I would because I believe in eating locally and sustainably. However, I value the role of the imported raw-milk cheese in alerting us to the wide, rich variety of flavours and possibilities in raw milk cheese production.

Final comment:

We need to encourage a new generation to learn the skills of proper cheese-making so that we can express the diversity of our country and its seasons. We also need to be able to import unpasteurised cheeses in order to give our local cheese-makers a benchmark of quality, integrity and flavour. And so that our children do not grow up thinking that cheese is something flat, yellow, salty and plastic.

Jill Dupleix.