

Seamons, Colleen

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To: submissions
Subject: Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

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.

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.

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

Yes, absolutely. Many consumers appreciate Australian made artisan food products. To this end many restaurants would use these new products to educate palates to the superiority of raw milk cheeses which could support the new industry as well as flag interest to consumers who will more than likely search out these products to have at home. Imagine if we could create our own history of raw milk cheese in Australia, many people world wide already import our products due to their superiority, imagine if we could do the same with raw milk cheese.

- 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?*

As much as I would currently for imported cheeses.

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

I would pay more than local gourmet cheeses and the equivalent of imported cheeses. In some cases, if I loved the flavour profile of the cheese, then I would be more than happy to pay a little more than import cheese!

- c. *Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?*
Yes, as I mentioned above.
- c. *Would you choose to purchase an Australian raw milk cheese over an imported equivalent?*
Depending on the flavour profile, yes. I believe we will be able to make great local cheese with raw milk but if it is more expensive than current import cheese then price may become an issue, unless the cheese tastes amazing.

Kind regards,

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