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

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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.

Consumers:

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

Yes. More consumer choice leads to increased competition in price, quality and service. Inferior products are eliminated or marginalised by market forces.

- 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?

A fair market price, consistent with the cost of production and a reasonable producer (and retailer where applicable) margin. I would not expect regulatory compliance costs to be significant, given these products would be produced under existing hygiene standards (domestic) and under the prevailing health regulatory regime (imports from other reputable producers/countries).

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

Only if the product was superior in some culinary respect. Not for additional regulatory impost.

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

Yes, but I would expect those costs to be measured in fractions of a cent per kilo.

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

If it were a better or significantly differentiated product to the imported equivalent, then I would purchase the Australian product. I'd probably choose many imported products as well.