

**From:** Stephen, Louise [LStephen@claytonutz.com]  
**Sent:** Tuesday, 9 February 2010 4:58 PM  
**To:** submissions  
**Subject:** Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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.**

**Louise Stephen, Information Services Manager, Brisbane  
Clayton Utz**

Level 28, Riparian Plaza, 71 Eagle Street, Brisbane QLD 4000 Australia | D +61 7 3292 7442 | F +61 7 3221 9669 | M 0423 313 498 | [lstephen@claytonutz.com](mailto:lstephen@claytonutz.com)



Please consider the environment before printing this e-mail

This email is confidential. If received in error, please delete it from your system.