

Seamons, Colleen

From: Francina Turner (MacCap Funds) [Francina.Turner@macquarie.com]
Sent: Monday, 22 February 2010 12:37 PM
To: submissions
Subject: Submission regarding Proposal P1007 - Primary Production and Processing Requirements for Raw Milk Products

Categories: Blue Category

I am writing in support of Will Studd's submission on Proposal P1007. In relation to the questions posed by FSANZ to consumers my opinion is as follows:

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. Australia's culture is diverse and I believe would support a greater diversity of choice in relation to cheese and cheese products. Consumers can be protected from additional risks associated with raw milk with adequate risk warnings, education and food service standards.

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?

Depending on the type of cheese, in excess of \$60 per kg.

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

Yes.

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

Yes. I would be willing to pay a premium for any extra testing that might need to be done to comply with Australian standards and for the higher rate of wastage for product with a short shelf life.

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

Yes. I believe that Australian producers can learn raw cheese making techniques to produce comparable quality product. It has been evidenced with other artisan cheeses.

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