

Seamons, Colleen

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Sent: Wednesday, 3 March 2010 11:12 AM
To: submissions
Subject: Submission regarding Proposal P1007 - Primary Production and Processing Requirements for Raw Milk Products

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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.

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

Many of the world's great cheeses are not available in Australia because of the current ban on imports. The popularity of the Roquefort cheese that is permitted (it is stocked in most of my local supermarkets) attests to the public's interest in a wider range of cheese than is currently available.

> 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?

Great cheeses can be expensive: I have spent over \$100 on cheese from specialist suppliers such as Simon Johnson on numerous occasions.

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

For good cheese, yes.

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

Yes, for good cheese. Certainly there should be clear labelling to enable consumers to make an informed choice. Good cheese merchants already have very high standards of safety including keeping cheeses at constant temperature and moisture levels, and keeping cheeses wrapped to avoid contamination.

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

It depends on the meaning of the word "equivalent". Australian producers may be able to make superior cheeses to some imports once the current ban is lifted. I would like to see broader availability of raw milk products, with appropriate safeguards, regardless of their country of origin.

Regards,
Michael Cahill.