

Raw Cows Drinking Milk Enhanced Safety Labelling – Consultation Responses September 2017

Respondent	Method of response	Comments	FSA Response
The FSA received four responses to this consultation, most from Trade Bodies who represent the industry and one from an individual.	Email	The majority of respondents support the proposal to introduce enhanced safety labelling for RDM.	
SD (individual)	Email	As hygiene indicators are tested on farm monthly, there is no need for additional testing.	This consultation was specifically requesting comments on the RDM labelling proposal, testing requirements were not in scope of this consultation.
The Royal Association of British Dairy Farmers (RABDF)	Email	<p>The (RABDF) recognises the potential benefits for enhanced labelling for RDM.</p> <p>Key comments:</p> <ul style="list-style-type: none"> • The need for consumers to have complete faith in the wholesome and safe image of milk coming from British dairy farms • Help in creating a unified stance on RDM 	Noted

		<ul style="list-style-type: none"> • Supports amending existing national regulations to enhance the current labelling provisions to protect vulnerable consumers of the risks associated with the consumption of RDM • RABDF have a number of dairy farmer members who produce RDM and would be happy to help with the roll out of the change of labelling in England and Northern Ireland • RABDF fully endorse this labelling amendment and congratulate the FSA on addressing a real issue in a sensible and proportionate way 	
Campaign for Real Milk UK (CREAM)	Email	The view is that as RDM in England is restricted in terms of sales and already difficult to source additional labelling would have limited impact.	Noted
Dairy UK	Email	<p>Key comments:</p> <ul style="list-style-type: none"> • Dairy UK is a trade body representing the interests of producer co-operatives, processors, manufacturers and distributors of dairy products within the UK • Dairy UK agrees with the FSA's preferred approach to amend the current labelling provisions for England and Northern Ireland and to introduce consistent labelling requirements for all 	Noted

		<p>species and across all UK countries in which the sale of RDM is still permitted</p> <ul style="list-style-type: none"> • The evidence on the microbiological safety of raw milk must carry particular weight and we believe that, out of all the options proposed, Option 2 is most in line with the FSA's statutory objective to protect public health in relation to food • Dairy UK is supportive of the view that the proposed changes would enhance protection of vulnerable groups against the hazards associated with RDM. At present, the full extent of the risks faced by consumers are not communicated adequately • Consumer surveys have shown that a substantial proportion of RDM drinkers consume this product driven by perceived health benefits which are not supported by scientific evidence • From a regulatory perspective, it is also important that consistent labelling requirements be in place across all species and across all countries of the UK where sales of RDM are still permitted • Dairy UK remain of the position that the ideal solution is for all milk to be pasteurised before being sold to the consumer 	
Provision Trade Federation	Email	Key comments:	Noted

		<ul style="list-style-type: none"> • Provision Trade Federation (PTF) represents processors and traders in a range of staple dairy, meat and fishery products, including producers and wholesalers of a wide range of specialist cheeses • PTF understand the need to strike the right balance between allowing consumer choice and protecting public health and support the provision of clear, unambiguous labelling which enables the consumer to make an informed choice • PTF supports the position of the Specialist Cheesemakers Association (SCA) who responded to the FSA's consultation on the 'Impact Assessment for the review of the controls governing the sale and marketing of unpasteurised, or raw drinking milk and cream (RDM) in England, Wales and Northern Ireland' • Neither PTF nor SCA represent Raw Drinking Milk (RDM) producers, but are concerned of the potential impact on the image of unpasteurised/raw milk cheese if a decision were taken to label RDM inappropriately • PTF support the FSA's approach of providing clear guidance and labelling of raw milk as proposed in option 2 to amend existing national Regulations to enhance the current labelling and harmonise the labelling requirements for England and Northern Ireland as for Wales 	
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