

**Seamons, Colleen**

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**From:** Brian Farrelly [b.farrelly@aiaa.com.au]  
**Sent:** Monday, 22 September 2008 3:45 PM  
**To:** standards management  
**Subject:** Submission re Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products (Discussion Paper)  
**Follow Up Flag:** Follow up  
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22 September 2008

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Your reference Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products (Discussion Paper)

Dear Sir or Madam,

I married into a family with a history of allergic reactions to various drugs and foods who have developed into strong proponents of organic foods, and are following the progress of this proposal with interest. After listening to their arguments and reading various papers, I am writing in support of the sale of raw milk products from healthy animals that are hygienically stored and transported and clearly labelled for consumers' information. Specifically, I believe that this poses no greater risk than consumption of many other widely available foods.

At the outset, while I appreciate that it is outside the scope of this discussion paper, it is disappointing that there is no-one obviously advocating raw milk on either the scientific advisory panel or standard development committee. This is not intended as any criticism of any of the individuals but a procedural failure to appoint people with a variety of opinions or, at least, a devil's advocate. As it stands, and not knowing their personal opinions, almost all appear to represent substantial commercial investments in existing arrangements, which does not create the impression of an unbiased court.

Likewise, the food safety standard being applied seems biased to result in a negative verdict. While I certainly don't want the risks associated with eating anything I buy to be needlessly amplified or multiplied, surely a fairer question would be whether consuming raw milk is any more dangerous than (for instance) eating processed meats, buffet meals, or anything from the self-serve pasta or salad bars at supermarkets. All of these are legal but risky, and consumers are left to make their own choices.

Also, the assumption that consuming pasteurised milk products is safe is at least debateable. Pasteurised milk has been implicated in its own share of public health incidents. The discussion paper author rightly qualifies their statements by admitting that it is difficult to pinpoint the exact cause of incidents and, again, a fair test would seem to be whether raw milk products were implicated in a significantly greater number of incidents than any other foods. You could even argue that it is unscientific to consider public health data where the pathogen has not been uniquely identified as coming from a raw milk product.

Consequently, I fully support clear and compulsory labelling of all foods with their ingredients, processing method (if relevant) and country of origin. If you are expecting consumers to make decisions, they must be informed.

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I also support calls for national consistency, so that our farmers can grow and sell produce domestically and internationally in a competitive way. I agree that it is unfair that current regulations allow the importation of foods that cannot be produced locally; again, is this food safe to eat or not?

I drink raw cow's milk on a regular basis. We used to get raw goat's milk sometimes years ago. We drink raw milk because my wife perceives a health benefit, and I am satisfied that it is no more dangerous than lots of other things we eat. From my own reading, it is much safer than soy 'milk', which you really should ban, and genetically-modified foods, for which there is no valid scientific data on health outcomes either way (you cannot have long-term results on brand-new products). Certainly, as a consumer, the only thing I notice is that it is usually more creamy than even the unhomogenised brands of milk. I have never had any illness as a result -- I am rarely sick at all (I had food poisoning from a take-away meal in 2004 (I think it was) and an ear infection in 1992).

Do I think there is much demand for raw milk products? No, but I don't see why they should be banned. If individuals want raw milk products, and they make that informed choice, I really don't see the harm in it.

On a side note, I would add that a lot of the pro-raw milk literature I have read relates dangers common to all intensively-farmed grain-fed animals, basically that unhealthy animals produce unhealthy foods. And most of the bad examples are foreign. I think you do need to consider the risks from 'the paddock to the plate', recognising that the health, diet and medication of the animals and the processing, transportation and storage of the product all contribute to the final quality of the food. But I think Australian dairies usually farm healthy animals in hygienic conditions, which again leads me to believe there is little extra risk in raw milk products.

In conclusion, I support the sale of raw milk products from healthy animals that are hygienically stored and transported and clearly labelled for consumers' information, because I do not believe that this creates any significant extra health risk.

Regards,  
Brian Farrelly  
Canberra