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Re: Proposal P1007 Primary Production & Processing Requirements for Raw Milk Products (Australia only)

Submitted by: Fromage Air – Cheese Importer

Who we are:

We've been importing fresh cheeses (mainly French) for the past 3 and half years very successfully and have been able to develop an attractive range of fresh products. The response from distributors, restaurants and retailers is invariably pushing us towards finding more interesting and flavoursome products. Our dealing with Quarantine has always been constructive and positive. We work closely with all our French manufacturers, making sure the products we bring in are in agreement with the Food Standards. This, of course, reduces enormously the amount of fantastic quality cheeses we can bring despite the greater demand from the local professionals and public. In an effort to offer the best examples possible of what the International Dairy Industry can offer, we are more and more convinced that the Australian public is not getting its fair share in the name of "safety measures". We are therefore very interested to be part of the steps taken to bring Australia into line with other major international cheese manufacturing countries.

What we want:

- 1- We would like FSANZ to reassess some outdated sciences and non-science which condemn raw milk as a carrier of pathogen.

Pasteurisation of milk for cheese making was historically introduced as a public health measure for the control of tuberculosis and brucellosis. While these diseases are no longer common in the Australian dairy herd, the reliance on pasteurisation of milk to control non-specific bacterial contamination of cheese has continued. In contrast, in Europe there is a greater emphasis placed on herd management and a hygienic system of control of the cheese making process to prevent contamination of cheese, rather than relying on pasteurisation. Numerous studies¹ show that the greatest pathogen contamination threat to raw milk is the creation and introduction of antibiotic-resistant bacteria combined with crowded manure-laden factory conditions. Frequent doses of antibiotics create resistant strains of bacteria, which are released into manure. These pathogens then cross-contaminate the raw milk during the milking process. Rather than addressing this problem at its root - supporting the natural health and vigour of the cow - dairymen have had to practice triage-style sanitation just prior to milking, often sacrificing thoroughness in the interest of time and money. This has resulted in poor test results, and a bad name for raw milk. The outcome has been the development of a huge industry in nutrient-deficient, lifeless milk from highly-stressed pregnant and nursing cows.

There is no substitute for clean, raw milk as a food, so far as children are concerned. Science has not yet succeeded in providing, in the pasteurized variety, those

¹ RAW USA

essential qualities that are the only real foundation for a healthy child, says Dr Mercola, a Canadian Doctor.

Unfortunately, many grossly distorted statements are current regarding our milk supply. If we are to believe the protagonists of the Pasteurization-of-all-milk-at-all costs Party, raw milk is as good, or rather as bad, as rat poison--although as the Canadian Minister of Agriculture recently stated, "the human race existed long before Pasteur was heard of."

It is undoubtedly beneficial to destroy dangerous germs, but pasteurization does more than this--it kills off harmless and useful germs alike, and by subjecting the milk to high temperatures, destroys some nutritious constituents.

Recent figures published regarding the spread of tuberculosis by milk show, among other facts, that over a period of five years, during which time 70 children belonging to a special organization received a pint of raw milk daily, only one case of the disease occurred. During a similar period when pasteurized milk had been given, 14 cases were reported.

Probably pasteurization's worst offence is that it makes insoluble the major part of the calcium contained in raw milk. This frequently leads to rickets, bad teeth and nervous troubles, for sufficient calcium content is vital to children; and with the loss of phosphorus also associated with calcium, bone and brain formation suffer serious setbacks².

- 2- To give Australian cheese makers a chance to learn the appropriate safety measures to work with raw milk, rather than depriving them from the ability to choose.

We believe that in order to meet optimum safety in regards to raw milk, FSANZ must consider looking at the very beginning of the production line (cows and farm settings) and define a clear code of hygiene and safety measures in order for a farm to get the stamp of approval for selling raw milk. Dirty milk, of course, is like any other form of impure food--a definite menace. But certified 1st grade milk, produced under strict government supervision and guaranteed absolutely clean should be the dairy farmer's answer to the pasteurization zealots.

- 3- International trade- We believe that like in France with the AOC strict guide lines and governmental support, FSANZ should help and support farmers to unite their strengths and savoir-faire give them a chance to promote and offer widely and internationally what they know how to do best.

The segmentation of the market is very important in the current economic context of competition. The strong identity of the products allows them to stand out on the national and international market.

- 4- Risk Factors: Are we too clean for our own good? We believe it is time to give some responsibilities back to consumers with the aim of better educating and informing them.

² RealMilk.com

It is interesting to note that in Australia, you are allowed to choose to eat raw meat and raw fish. It is understood that as a consumer, you know the risks you are taking, therefore are more prepared to check all the important details regarding these two potentially 'dangerous' products. Why would raw milk be any different?

"If you look at the food poisoning statistics in a country like France [where a lot of raw-milk cheese is eaten], the incidence of food poisoning from dairy overall is minute. In one year, it was less than the problems from drinking water."³ This is supported by statistics showing that in Europe, most cheese-related food poisoning incidents were traced to pasteurized cheeses⁴. In the U.S, between 1988 and 2002 (it's the country that seems to keep the world's best health records in this area), there were 88 recorded deaths where "food-borne diseases" were listed as the cause. If one per cent of these related to milk products, then the numbers of people killed by raw milk in the U.S. over a five-year period is somewhere between one and a big, aggressive zero⁵.

Randolph Hodgson is the owner of Neal's Yard Dairy, a London cheese shop. With degrees in food science and chemistry, Hodgson is also a champion of the British cheese industry and a campaigner for raw milk cheese. "There are two schools of thought," he says. "One is the elimination of all risk [of ingesting bacteria]. This is unattainable unless we have sterile food.

Hodgson takes the probiotic view of bacteria - the belief that ingesting harmless bacteria colonies prevents harmful ones multiplying, a technique known as "competitive exclusion".

Eating yoghurt to build up good intestinal flora is one example of this theory. On the topic of probiotics, Hodgson says: "If I were to have my scientific hat on I would say not enough research has been done. But if you ask me about my own children - they recently returned from India with giardia [diarrhoea caused by an intestinal parasite] - I'm glad I fed them raw-milk cheese."

It appears to come back to culture. In Europe, where food - and especially cheese - is taken seriously, regulators are willing to take what they see as acceptable risks. Here, we want to regulate towards a risk-free food supply.

5- FSANZ to reassess the microbiological standards for cheese, especially in regards to E.coli.

Escherichia coli is one of the main species of bacteria that live in the lower intestines of warm-blooded mammals. A human being will pass between 100 billion and 2 trillion of these bacteria daily in faeces.

³ Sydney morning Herald

⁴ Wikipedia

⁵ CBC News – Stephen Strauss: A look at the raw milk debate

Maybe then, when we think of *E. coli*, we think of faeces. And yet, these same bugs - and other coliform bacteria - are present in some of the most highly regarded foods in Europe: raw-milk cheeses.

The Australian Quarantine and Inspection Service recently rejected a shipment of French Roquefort cheese because of - in the words of the Imported Food Inspection Advice - "... the presence of *E. coli* at 10, 30, 20 cfu/g [colony-forming units per gram]." The cheese was rejected because more than one sample was over 10 cfu/g. By contrast, the limits for raw-milk cheese in the European Union guidelines are between 100 and 10,000cfu/g. At that upper level, the cheese batch must be tested for enterotoxins - toxic strains of normal *E. coli*.

The problem is that not only is the presence of *E. coli* in raw milk cheese (and other traditionally made food products) normal but, according to Roberto Foschino, an Italian microbiologist, "the facts show that the ingestion of such micro-organisms causes no harm, even to people who eat such products a lot. On the contrary, it would appear to cause pleasant gustatory sensations."⁶

There is no reason why cheese made from raw milk should represent a greater degree of risk than those produced from pasteurised milk provided recognised international guidelines are adopted in Australia.

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**Valerie Henbest
Fromage Air
25 Wright St
Adelaide SA 5000
Ph: (08)83793276
Mob: 0411662040
Email: vhenbest@bigpond.net.au**

⁶ Sydney Morning Herald- John Newton - June 2006