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Public comment on Proposal P1007 – production and sale of raw milk products in Australia

I have read your discussion paper on the above topic and also spoken with Christina Belpirio over the phone. I believe FSANZ has covered the current issues in detail and applaud your approach.

I am in touch with many people Australia wide who desperately wish to purchase fresh raw milk legally or who are already consuming fresh raw milk illegally. I dispute the comment "raw milk products are rarely consumed in Australia" as there is a huge underground movement that do make and consume these products. Because of current government and FSANZ regulations, it is impossible to gather data for epidemiological studies and that is a real pity. People who are involved with raw milk consumption are hunted down and investigated and threatened with huge fines particularly here in Queensland.

The people who consume these products for whatever reason e.g. perceived health benefits or philosophical reasons, are very well educated and knowledgeable and have done their research. The World Wide Web offers great access to this information. Unfortunately for the past how many years in Australia, little to no research has been done on raw milk as, supposedly, it is not being consumed.

In Queensland consumers are able to access raw goat that has been frozen and that took many years to be sorted legally. I have no understanding as to why freezing milk makes it any safer. I believe that nationally applicable Standards would certainly be of considerable assistance in this matter.

I am sure you are aware that brucellosis has been eradicated Australia wide <http://209.85.141.104/search?q=cache:DnB7t4UZRpAJ:www.vetsci.usyd.edu.au/avhs/milestones/brucellosis.pdf+eradication+of+bovine+brucellosis&hl=en&ct=clnk&cd=1&client=firefox-a> (except maybe in water buffalo in Northern Territory) and in Queensland we have no Johne's disease http://www.dpi.qld.gov.au/cps/rde/dpi/hs.xsl/30_10639_ENA_HTML.htm and tuberculosis has also been eradicated Australia wide <http://www.animalhealthaustralia.com.au/programs/adsp/nahis/diseases/btb.cfm>

I would be delighted to be involved in a study where data is collected through in-depth interviews and have many friends who would be happy to do the same. We are disappointed in the members on the Standard Development Committee Membership who seem to be mainly from corporations or large member groups and government departments. We feel ignored and frustrated through this process.

I note the comment regarding importation of 4 raw milk cheeses at present but the Code does not allow for the domestic production which creates a non-level playing field. Raw cheese production is not exclusively about a 'level playing-field' – it is about the magical alchemy of turning milk into cheese that was originally used for milk preservation. This has now evolved into a sensational food because of local regional and environmental factors. Australia does not have a long history of cheese making but that does not mean we aren't ready to embrace these wonderful tastes and flavours. I am passionate about Australia and support as much Australian made produce as possible and am disappointed we don't boast a home grown industry of raw milk cheeses. Why should I support other countries products when we could have a vibrant and innovative natural cheese industry here?

Britain debated these issues in recent years and thousands appealed to retain sales of raw milk. They managed to resolve the situation and their Code reflects this http://www.opsi.gov.uk/si/si2008/uksi_20081317_en_1

Most people who drink raw milk really want to have a choice. They want to make the decision about what foods they put in their mouth - we believe we have the right to do so. Laws and legislation relating to foods are overwhelming and inconsistent. People can legally consume alcohol and ingest nicotine which are scientifically proven health risks but are unable to drink a natural whole food that has not been tampered with. Seems quite perplexing to most people.....

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Certification of raw milk dairies could be a way through and most people who drink raw milk look for organically produced. To gain organic certification, a farmer's pastures and dairy and products go through a rigorous assessment process and hopefully that would satisfy FSANZ requirements. Costs associated with implementing any new requirements are certainly a big consideration for local dairies. Consumers of raw dairy milk generally wish to buy fresh, local and seasonal foods and support our small farmers – after all when all the farmers are gone, who is going to feed us.

Transportation of raw milk is certainly a consideration and most raw milk consumers wish to know exactly where their milk comes from and would consider all raw milk to go into one large pool to be unacceptable. There has been some mention in Queensland about the unacceptable use of plastic containers for raw milk storage but that can be easily overcome by decanting into glass jars

Regular bacterial counts can be done on the farm as *Organic Pastures* does in the United States <http://www.organicpastures.com/labTests.html> This farm is a great illustration as to how raw milk and its products can be handled and we can learn a lot from Mark McAfee who owns the farm.

Labeling of unpasteurised milk is certainly recommended and agreed by consumers who can then make their own decisions and have a choice – exactly what we are asking for.

As to the 'perceived health benefits' of raw milk, I personally know of numerous children and adults who have been able to finally tolerate dairy milk and cheese in the natural form. These people have previously been diagnosed with lactose intolerance (very rare indeed) and had really suffered when drinking pasteurised milk and cheeses and removed them from their diet. I know this is anecdotal but to those people who suffer, it is just miraculous.

Raw milks of many descriptions are consumed worldwide and with that understanding it would seem a better option to develop policies and procedures that benefit all stakeholders as raw milk consumption will NEVER cease.

I do not have a scientific background but do understand about public health concerns and believe that a way forward can be found to facilitate access to these products. With Woolworths and Coles holding 60% of the dairy market in Australia we understand the market pressures but believe with a spirit of co-operation all stakeholders can have their needs fulfilled.

Yours sincerely

Judy Williams

In answer to the question on what raw milk products I consume

Raw Milk - 2 – 8 litres a week depending on how many are in the household
Raw cultured butter – 250grms per week
Raw whey – 250mls per week
Raw cheese – 250grms per week
Raw yoghurt – 250 grm per week
Fermented milk (using kefir grains) – 2 litres per week

I have knowledge of 600+ consumers using raw milk and raw milk products and all these people are keen to access Australian made raw cheese and raw milk yogurt.