

## Seamons, Colleen

---

**From:** paulinek@meta4technology.com  
**Sent:** Monday, 22 September 2008 12:29 PM  
**To:** submissions  
**Subject:** SUBMISSION FOR PROPOSAL P1007 - Primary Production and Processing Requirements for Raw Milk

**Follow Up Flag:** Follow up  
**Flag Status:** Blue

I wish to add my opinion for consideration to the Submissions Panel.

My Husband and I have begun using the Raw Milk to drink, to make cheese to make Keiffer. We have embraced the Weston Price Food Foundation guidelines and participated in the Canhelp.org.au program. We were previously both medically allergy tested and told we were allergic to dairy products. The allergy only applies to pasteurised and homogenised dairy products.

We are now free of dairy allergies using Raw Milk. Furthermore, my husband was diagnosed with prostate cancer with a PSA of 5.5 [ and 7/10 on the Gleeson scale]. His most recent blood test at the St George hospital showed a drop to 3.1 in his blood count. We attribute this entirely to the Canhelp.org.au program plus the Raw Milk/dairy products, plus the Weston Price Food program.

The points below are taken from the Nourished Magazine Website for inclusion in the submission. We are grateful to have the opportunity to bring our requests to your attention.

Yours sincerely,  
Pauline and Alan Kirby

What we want  
As raw milk consumers we desire:

Easy access to clean, unprocessed milk from local dairies with healthy cattle that are grass fed only FSANZ to reassess outdated science and non-science which condemns raw milk as a carrier of pathogens and consider science based recommendations for consumption of raw milk.

Certification of raw milk which ensures its cleanliness and its healthful properties remain intact Regulations which require raw milk and raw cheeses to be traded ONLY via localised, cottage industry My family and I have been taking raw milk for the past year, and have been thriving on it. My husband was lactose intolerant, and my children would get red patches on their faces and bodies on pasteurised milk? Since we've been on raw milk for the last year, we had NO recurring problems.

and I learned that it was due to the altered states of the different proteins in pasteurised milk, amongst other things. When we run out of raw milk, we have no choice but to revert to the regular Pasteurised ones, and I can tell you that to the whole family, such milk now looks extremely artificial to us.

We consume, as a family, 4L of raw milk a week, and would appreciate regular and available supplies.

We suggest the recommendations of experts, such as the NourishedMagazine contributors and all their resources, be heeded to.

I hope this will help to make raw milk readily available to the public.

This is just a sample of the recommendations raw milk drinkers make on Nourished Magazine.

Our family of 3 Adults and 1 toddler have been drinking raw milk for several years. We drink on average 5 x 2L bottles a week between us.

Have done a bit of research into the benefits etc, but basically it just makes a whole lot of sense - any food product you boil will lose vitamins. I would never buy heat treated salad products because of a small health risk. That said I do not discount that there is a risk, it is important to me to know the cows are raised and milked in a clean environment.

The raw milk we consume tastes great and does not cause the irritable bowel symptoms

that I have after drinking regular milk (I have been drinking soy milk for years because of this). Also, I want to add, in all the time we have been drinking raw milk none of us has had any ill health effects from it. I am very excited about the prospect of it being legalised, and regulated. Also about the prospect of being able to buy unpasteurised cheese, butter, etc. Many more comments here:

<http://editor.nourishedmagazine.com.au/articles/raw-milk-consumers-comments>

Practitioners who contribute to our community also recommend many of their patients use raw milk for it's healing properties:

I would like to see the FSANZ legislate to allow the legal consumption of raw dairy products, so that the availability can increase and provide access for many people who would do well on this product. The small risk of listeriosis and other food borne pathogens is real for dairy - just as it is for many other products that are presently safely regulated and marketed. We do not need to outlaw a product with a small inherent risk - rather we need to give firm production guidelines and develop standards for producers from 'farm to table'.

and we need to educate consumers. It is important to note that most people already consuming or wanting to consume raw dairy products are educated and health conscious. The industry has inherent self regulation already in place. Like any business, if the quality of the product is not good enough, then the market goes elsewhere. Market forces for small scale raw dairy products are a real and efficient method of ensuring quality products day in day out. Without having access to the masking effects of pasteurisation (to kill bacteria present from poor hygiene or methods), raw dairy farmers must instead rely on scrupulous manufacturing processes to ensure a clean and safe product for their customers. FSANZ, the public has a right to access clean, health-giving raw milk - just as nature intended.

Karen McElroy  
Naturopath & Medical Herbalist  
Noosaville 4566.

The Nourished Community wish to be part of the process of legislating a raw milk cottage industry.

We strongly disagree with FSANZ's statement:

'Additionally it is suggested that some consumers may have perceptions of food risks inconsistent with scientific risk assessments.'

We believe ourselves to be highly educated and very experienced with the subject, many of us have been learning about and consuming raw milk for over a decade. Some of us, our whole lives.

We do not concur with the current dogma that common scientists and micro-biologists adhere to and do not see the risk assessments referred to above, to be scientific or correct, in some cases merely beliefs.

We include in this submission some of the data we share with each other in our quest to better understand the nature of raw milk.

What Makes Raw Milk Safe?

As stated above, we do not agree with the so called science that has vilified raw milk throughout the past few decades. Here are some facts which lead us to this conclusion:

Pasteurised milk has caused 2,185 times more food borne illness than was attributed to raw milk..1 According to statistics posted at the US government's Centers for Disease Control website, those consuming raw milk are 2.5 times less likely to contract food borne illness than those consuming pasteurised milk and 3.5 times less likely to contract food borne illness from consuming other foods..2 Raw milk has never been proven to cause outbreak or epidemic whereas pasteurised dairy has. Many outbreaks of food poisoning supposedly attributed to raw milk have remained unproven. Large dairy conglomerates have always had a hand in any recommendation given by governing bodies with respect to raw milk..3 Arguments for pasteurisation are based on a discredited medical

paradigm..4 where the human body is a sterile machine and ill health is caused by invading and marauding micro-organisms.

Even when milk is pasteurised, heat resistant pathogenic bacteria may remain..5

Tuberculosis has been proven to exist in two distinct strains, one being Bovine and one human. Humans can not catch Bovine TB..6,7 Grass Fed Raw milk has components that cause it to destroy pathogenic

bacteria..3 Dold, H., Wizaman, E., and Kleiner, C. wrote in their abstract, "[Raw] Human or cow milk added to an equal volume of agar did not support the growth or allowed only slight growth of B.diphtheriae Staph. aureus, B. coli, B. prodigiosus, B. pyocyaneus, B. anthracis, streptococci, and unidentified wild yeast..4 Such components include Lacto peroxidase, Lacto Ferrin, short chain fatty acids and beneficial bacteria..5 All of which are destroyed by pasteurisation..6 The "inhibins" in cow's milk are inactivated by heating between 60-70 degrees C. for 30 minutes." Campylobacter bacteria has been shown to have been reduced to negligible amounts within days..7 Factory farmed cattle have 300 times more pathogenic bacteria in their gut than do grass fed cows..8 We strongly refute FSANZ's claim that "Animal health issues other than those that specifically impact upon human health via food borne transmission are not part of FSANZ's responsibility and will not be considered in this assessment."

Ruminant animals who are healthy give milk that is more likely to repel pathogenic bacteria. We demand grass fed milk for this reason.

Raw Milk has been shown to be superior nutritionally to Pasteurised Milk..5..14

Humans become immune to bacteria to which they are regularly exposed..1,4 Bacterial and enzymatic components of raw milk actually improve immune response to pathogenic bacteria..10, and over all immune strength, raw milk has been shown to help avoid the development of Asthma and Allergies, especially if drunk during the first year of life..13 It is virtually impossible to control the trade of Raw Milk via large corporations. Dairy industry conglomerates conspire to subvert scientific study and control legislation to support their financial gain..10 .

We agree that unpasteurised milk from a mix of many large herds fed anything but what they were born to eat, milked in filthy dairies and transported to equally filthy refineries MUST BE PASTEURISED.

But we do not want to drink the milk that comes from such an industry.  
We want to drink milk that is certified to be:

From one inspected and certified source: never commingled with raw milk from other herds.

From herds that consume grass and hay exclusively From herds tested to be free of TB. (Although we know we can't contract bovine TB, we wish to drink milk from healthy cows - nutritional support for cows have shown to reduce TB in herds..12) From local sources ONLY. Raw cheeses made from local milk within hours of milking. Tested to be less than 20,000 SPC on one time per month by certification agency AND independent testing on finished products:

Zero pathogens including, Listeria M, E coli 0157H7, Salmonella, Campylobacter in finished products. Worst pathogens ( e coli 0157H7 ) tested more frequently ( at least once per week by farmer with results recorded and sent to certification agency). Farmed with an Active Farm Food Safety Plan based on HACCP principles to identify risks and manage them. This plan is tested for compliance. Labeled as Raw Milk. We see no need to label with warnings unless Pasteurised dairy will also be labeled so.

.  
Certification For Raw Milk

We submit as references, "Raw Milk Production Handbook" published by the Weston A Price Foundation..12 and ask that FSANZ to use the Raw Milk Certification available in US to create our own here in Australia.

We, the Nourished Magazine Community, as consumers of raw milk, wish to be consulted during the process of creating this certification.  
Some recommendations we include are:

No antibiotics may be used on a cow or other mammal from which raw milk is distributed. Antibiotic treated cow's milk must remain separated for one year No growth or milk stimulating hormones may have been used at any time No pesticides on cattle or environment All dairy pastures certified organic or certified transitional. Cattle allowed access to pasture 150 days per year at a minimum and 100% of the time when possible. All natural feeds that the animal would naturally eat in nature.(natural corn, barley, wheat or forages but not soy or cottonseed or other unnatural processed feeds.) Clean place for cattle to lie down and rest. All bedding areas are natural pasture or something that the cow would find in a natural environment. No free stalls or loafing stalls. Lactating animals must not be kept in crowded conditions and must be allowed to range freely, seek solitude and undisturbed rest. There must be adequate space available for the animal to experience all natural behaviors including: birthing, breeding etc. There must be ample clean fresh water available - no crowding for competition to water

access.

Monthly testing for pathogens including the presence of Salmonella, Ecoli 0157 H-7, Listeria Monocytogenes.

No TB and Brucellosis in herd on initial test and then once every two years.

All raw milk must be chilled to below 4 degrees C within one hour after milk is drawn from animals. No product will ever be exposed to heat above 48 degrees C at any time, assuring that enzymes and bacteria are undamaged, alive, active and healthy.

All stored or packaged raw milk to be kept at or below 4 degrees C until consumer sale (1-2 degrees C is preferred).

All milking parlors and equipment, milk houses, milk handling and bottling equipment shall be kept clean according to the standards required by the local county or state milk sanitation standards for Grade A milk production. No sterilizers may be used including quaternary ammonias.

.

#### Localism

Societies all over the globe have used raw milk and raw cheese in their daily lives for thousands of years. The success and relative safety of their dairy food production comes from the small scale, local nature of traditional milk and cheese making. For a raw milk and cheese industry to work in Australia, we need raw milk to be distributed or made into cheese within hours of milking. Small herds and artisanal cheese making along with local milk distribution is the best and safest way to create such an industry.

We request that FSANZ build into regulations for raw dairy products requirements for localisation of milk distribution and cheese production. eg:

milk, cream and butter from small singular herds, distributed to local market via herdshares or via retail stores with strict labeling cheese made from small herds on the same property as production unit.

.

#### Herdshares

We believe community supported agriculture initiatives like herdshares protect cows, farmers and consumers alike by providing transparency and consumer direct opportunities. There is a growing base of consumers interested in accessing raw milk via herdshares - see herdshare.com. These consumers desire more control over their food security from a quality and a supply point of view. They are prepared to become ? partners? with local farms to ensure they have dairy products which reach the standards they demand. Herdshares, while adhering to all certifications and regulations FSANZ create, also take much of the responsibility of dairy food quality from the shoulders of FSANZ and places it squarely on the shoulders of the consumers, replacing punitive one-size-fits-all laws with good, old fashioned relationships.

We'd like to see community supported agriculture initiatives such as this be supported by FSANZ and the Australian Government. We believe the relocation of food supply is the panacea to the many ills FSANZ, the Public Health System and our environment suffer.

#### We Want to Help

Please view the Nourished Community as a source of anecdotal research and case studies. Many consumers of raw milk feel fearful about communicating with FSANZ directly about their raw milk consumption.

This is especially true since retailers have been threatened with large fines for recommending the cosmetic milk they sell could be consumed. We suggest FSANZ observe and become involved with conversations among those who contribute anonymously via our website for this reason.

#### References

(Vonderplanitz and Campbell Douglass testimony to California court re: raw milk)

<http://editor.nourishedmagazine.com.au/articles/vonderplanitz-and-campbell-douglass-testimony-on-raw-milk>

<http://www.realmilk.com/appeal-jun06-facts.html>

In 2004, University California Davis, Agricultural Department experimented with spiking raw milk with various pathogens to see if raw milk truly exhibited antibacterial activity. The experiments proved absolutely, conclusively that Organic Pastures Dairy's raw milk inhibited pathogenic bacteria from breeding in it.

Z. Hyt. Inf., ?Antiseptic in milk,? The Drug and Cosmetic Industry, 43,1:109, July, 1938.

<http://www.realmilk.com/ppt/index.html>  
 Scientific American, December 1995 and The Lancet 17 NOV 1984;2(8412):1111-1113  
 Applied and Environmental Microbiology, 1982;44(5):1154-58 Peck, John E. ?Spinach Crisis Reflects Need For Smaller Farms,? The Capital Times, A8, October 2, 2006 Johnes bacteria (implicated in Crohne?s disease) - Appl & Environ Microbiol 2002 May;68(5):2428-35; Botulism spores - Elliott Ryser. Public Health Concerns. In: Marth E, Stelle J, eds and Applied Dairy Microbiology, New York, Marcel Dekker, 2001; Listeria monocytogenes and E. coli O157:H7 - Binderova and Rysanek. Veterinarni Medicina. 1999;44(10):301-308; Dormancy of heat-treated E. Coli can cause typical laboratory culture techniques to underestimate presence of E. coli in pasteurised milk 100-fold - Gunasekera and others. Appl Environ Microbiol. 2002;68(4):1988-1993 (and references therein). Campbell Douglas, William ?The Milk Book?, being sent to FSANZ by post. Schmidt, Ron ?The Untold Story of Milk? ?The Raw Milk Handbook?, Tim Wightman: The Weston A Price Foundation - <http://westonaprice.org/federalupdate/aa2008/30apr08.html>. A Handbook is being sent to FSANZ by post. Please Ask for a copy if this doesn?t arrive. Dr. Marco Waser, from the University of Basel in Switzerland, Journal: ?Clinical and Experimental Allergy?, May 2007. - <http://www3.interscience.wiley.com/journal/117999972/abstract?CRETRY=1&SRETRY=0> Appendix A - Nutritional Differences Between Pasteurised and Raw Milk Share this article These icons link to social bookmarking sites where readers can share and discover new web pages.

About the Author...

A Super Hero and one of many who have realised their true calling as saviors of humanity, healers of our connection with Nature and creators of Heaven on Earth. The Nourisher's gift is the re-spiritualisation of the 'process of recreation' we call eating.

Mother of three Super Heroes in training and wife to her God incarnate, The Nourisher hails from the place of feminine healing, Byron Bay, Australia. She gathers together Life Creators from all over the globe at [NourishedMagazine.com.au](http://NourishedMagazine.com.au) MENUCategories

Editorial

Green Living

Health Politics

Healthy Families

Healthy Recipes

Healthy Woman

Home Schooling

Inspiration

Lifestyle

Localism

Native Nutrition

Natural Health

Parenting

Real Raw Milk

Review

Uncategorized

Wholly Birthing

Community Links

Browse Blogs

Start a Nourishing Blog

Socially Responsible, Ethical investment. Change your Super now.

Advertise with Nourished

Subscribe to receive our free monthly newsletter.

Name:

Email:

> SUBMIT COMMENTS - 9 ResponsesFeed for this Entry

-----  
1. Uta Bauer

Sep 15th, 2008 at 2:50 pm Thanks for a great submission Joanne and the team of contributors. I will be happy to plagiarise and get people I know to email a separate submission.

2. Judy

Sep 16th, 2008 at 5:21 pm Very thorough, well researched, non-threatening - just what the naturopath ordered!!

3. wendy

Sep 16th, 2008 at 11:17 pm Thankyou for your tireless effort in creating a healthy planet, a great submission 4. The Nourisher Sep 17th, 2008 at 11:25 am THE FSANZ SUBMISSION DEADLINE HAS BEEN EXTENDED UNTIL 24 SEPTEMBER! So if you're reading this now, you've still time.

5. Philip Cook

Sep 17th, 2008 at 6:23 pm I think that the email address for the submissions should be:

standards.management@foodstandards.gov.au

When I tried the email address that you have above, my email bounced back.

6. Philip Cook

Sep 17th, 2008 at 6:24 pm BTW - great work everyone for the research!

7. Philip Cook

Sep 17th, 2008 at 6:39 pm Actually the address : submissions@foodstandards.gov.au is correct, just the hyperlink above has an extra ? full-stop? at the end.

8. The Nourisher

Sep 17th, 2008 at 6:50 pm Natascha Mirosh of The Courier Mail has written an excellent article for Tuesday's Courier Mail. To write the article she interviewed The Nourisher:

<http://www.news.com.au/couriermail/story/0,,24348200-5013511,00.html>

9. Carolyn Hay

Sep 18th, 2008 at 9:21 am Impressed. Great submission. I was impressed and sent a submission.Love..

COMMENT ON THIS ARTICLE: Name (required)

Mail (will not be published) (required)

Website

Anti-spam word: (Required)\*

To prove you're a person (not a spam script), type the security word shown in the picture.

Notify me of follow-up comments via e-mail

> SUBMIT

-----  
« Vonderplanitz and Campbell Douglass's testimony on Raw Milk  
-----

Recent Community PostsMy daughters warts gone!  
Teeth Don't Decay in Healthy Bodies

Nourished Community FSANZ submission for Raw Milk Anti-ageing and Antioxidants?.How to look younger for longer?  
Vonderplanitz and Campbell Douglass?s testimony on Raw Milk Recent Sponsor?s PostsNew Sample Mailer Available Traditional Foods for Kids- organ meats Centuries of Swiss Cheese Experience Welcome to the NUIGeneration Witchs Brew Update Recent Discussionsby: Marie (New & Nourishing) - Hi there Marie!  
(great name - same as mine!) I'll try find a photo, she is Read more...  
by: The Nourisher - Sounds fabulous Simon. You can be sure the Nourished community would be Read more...  
by: Carolyn - Clive, how exactly do you make your fermented peanut butter? Read more...  
by: Lolita - Clive, It was stretchy. I halved the recipe. I am in the US and it seemed Read more...  
by: AmandaL - I was told to have my gall bladder out and that was over 12 years ago. Read more...  
by: UncleBoogie - weneeG is either a dentist, or is just parroting what they've been told, Read more...  
by: MiMi - Thanks for the advice everyone, i will try cutting out on the foods that i Read more...  
by: Peter - Although not talking specifically of organ meats, here is a link to Read more...  
by: Dogray - Hi Mimi, Yes, I agree with Julie that it's best to have smaller meals, Read more...  
by: Julie - Hi Mimi, I know it is hard to not think "just cut it out of me " while Read more...