

69 Charles Street
Kew 3101
Australia

19 August 2008

Standards Management Officer
Food Standards Australia New Zealand
PO Box 7186 PO Box 10559
Canberra BC ACT 2610
AUSTRALIA

By email:

submissions@foodstandards.gov.au

Submission

Proposal P1007

Primary Production and Processing Requirements for Raw Milk Products

This is a consumer response to the Discussion Paper P1007 on Raw Milk Products. I have divided my submission into three parts: (a) my summary, (b) my response to your questions to consumers at 9.2 of the Discussion Paper and (c) my comments on the Discussion Paper.

(a) Summary of my position

I support consumer access to locally produced raw milk and to raw milk products, both imported and locally manufactured. I advocate the labelling of products that are, or use, raw milk but I do not support labels referring to health hazards or dangers.

There should not be a restriction on the importation of raw milk products, particularly cheese, provided they comply with country of origin production schemes; that trade should be based on an open market. There should not be restrictions against local producers of raw milk products, particularly cheese; it is discriminatory to do so. On the contrary, the local raw milk cheese market should be actively encouraged.

I strongly advocate no general restrictions against raw milk or raw milk products. The Code standards should be national, including the labelling standards.

(b) What you want to know

(i) My consumption of raw milk products

Our whole family drank raw milk from a neighbouring dairy after we moved to that area in the late 1970s. We stopped in the mid 1980s only because the dairy was subdivided and sold. We would get 6-8 litres at a time in cleaned buckets, several times a week. My mother instructed us all how to respect the cleanliness of the milk both in collecting it and keeping it at home. None of us ever got sick on account of the milk. We loved the raw milk. It tasted better; we all thought so. I still remember its taste.

I have been to Europe, and particularly France, on many occasions between 1980 and 2005. I have eaten many cheeses, plenty of which were raw milk products, derived from cows, goats and sheep. I bought these from markets, in restaurants and at farm-doors. Many of these were raw milk products. On some local farms we spoke to the proprietors and saw the process of making raw milk goats' cheeses. I have drunk raw cow's milk from a dairy in France over a week long period, when I was staying nearby. If it is relevant, none ever made me sick; nor the friends and family I was with on various occasions. As to flavour and texture, the raw milk products were better than equivalent pasteurised products, either in Europe or Australia.

(ii) Perceived demand for raw milk products in my community

In my circle, there is a demand for raw milk products, particularly cheese. Some share this view stridently. The demand is for both imported and locally produced raw milk products to be available.

Those in my circle are clearly of the opinion that raw milk cheeses are better, particularly in taste. Several know how and where to obtain raw milk around Melbourne. They believe that raw milk products should be available here, as they are in Europe where people eat raw milk products daily without public health issues.

(iii) Particular demand for some raw milk products, eg domestically produced raw milk cheese

I believe there is a particular demand for raw milk cheese. For myself, I buy a local gruyere rather than the Swiss one because it is local and good. I would buy good, local raw milk cheeses, whether cow, sheep or goat, if available. I know many people who would similarly like access to domestically produced raw milk cheeses.

(c) What I want to tell you

I love cheese, especially raw milk cheeses. I consider myself a bit of a foodie and appreciate the superior taste and texture of raw milk cheeses compared to their equivalent treated-milk type. I would love to be able to purchase in Melbourne a wide variety of raw milk cheeses from Europe. I would love to be able to purchase in Melbourne a wide variety of raw milk cheeses produced locally.

I am a qualified veterinarian and have some understanding of the nature of pathogens, public health issues and the importance of risk assessment. I am not opposed to and indeed support treatments to milk in the interests of public health and safety for the many who do not concern themselves with flavour or purity. On the other hand, raw milk and its products should be available to those of the public who do value its flavour and texture. This should equally apply whether the raw milk cheeses are produced locally or internationally.

Notwithstanding the assertion of the Discussion Paper to the priority of public health and safety, the statistics in Attachment 1 do not seem to bear out a case for such a rigorous ban in the Code. Given the 30 year basis of the data, and the many millions of people who would have consumed such raw milk products in that time, 38 deaths from raw milk and 56 deaths from raw milk cheeses suggests the Australian response

is inequitable and excessive. Cars are not banned for causing far more deaths in a far shorter period.

Millions of people around the world consume raw milk products daily. The makers of the Australian FSANZ Code must acknowledge that cross-species raw milk is a natural product that has been consumed by humans for thousands of years to the benefit of mankind. SFANZ and the Code need to ensure they are not puritanical in the name of public health. Australians should be able to access raw milk products of a quality accessed in other parts of the world, such as in Europe.

It is not irrelevant that Australia is known for its high quality of food products, whether 'green', 'organic' or 'fresh'. An industry of raw milk cheeses should be allowed to develop and compete on an equal footing.

Australian standards do not need to be an all or nothing affair; standards may be achieved that permit a balance between public health and access to many raw milk products. Whether for levels of hygiene in production or processing, or in labelling, standards can be set which attain this balance between public health and access to a range of raw milk products.

I strongly urge changes to the FSANZ Code to allow imported and locally produced raw milk, particularly its cheese products, on the Australian market. Thankyou.

Judy Bourke