

Submission on the need for change in the regulations on raw milk products.

As the marketing manager for [REDACTED] I cannot claim any great knowledge about the cheese making process, but I have read the supporting documents 1,2, & 3 which I got with the call for submissions on Proposal P1022 & I would like to comment on them.

Most of the requirements specified in Doc 1 are already covered in our Food Safety plan, as the utmost standard of hygiene is required for any dairy production. The safety of raw milk depends heavily on the health of the animals, and chemical-free farming without dependence on antibiotics is likely to produce a more robust milk with more of the good enzymes and bacteria to protect from the dangerous ones.

In my work I am constantly face-to-face with the consumers at Farmers' markets, and there is a strong demand for "bath milk" from many people who have read about the benefits of raw milk. We in WA are allowed to sell raw goats' milk, & many people buy that in preference to cows' milk, due to it's greater digestibility & the high prevalence of lactose intolerance & allergies. It is a familiar question "what is the cause of my children's allergies, I'm sure there never used to be as many problems" The food industry has traded on it's "clean & green" image without actually looking at the list of ingredients that have found their way into what should be simple foods.

We do not sell "bath milk", but I have been told that a major producer now does, as well as numerous small dairies. The demand for back to basics food is very strong, & we should be looking after the market with regulated production instead of turning a blind eye. I am also asked for raw milk cheese, & have to tell people that they have to buy imported cheese if they want a raw milk one. Most people get the joke when I say that we know the French are SO much better at following rules than we are!

Artisan cheese making in Australia is growing, & we have some very good local cheeses. Most of the successful cheese makers have increased their production in order to become viable, which will inevitably lead them away from single-dairy, grass-fed, chemical-free milk. We think there is room for a small producer, single-dairy, to make true traditional cheeses, & we have gained quite a following among discerning consumers. I would like to be able to satisfy the demand for a truly exceptional raw milk cheese, made on a small scale, traditionally wrapped instead of sweating in plastic on the supermarket shelf. The information in Supporting Document 2 is useful in deciding what cheese-making method might give us a good result.

Supporting Document 3 seems entirely concerned with the growth of *Listeria monocytogenes* in processed milk, either pasteurised or powdered. The whole point of making a raw milk cheese is to use the beneficial bacteria & enzymes that are found in good quality milk to fight the dangerous bacteria in people's bodies as well as in the environment. I acknowledge the risk of allowing bad bacteria to grow, but I don't think the studies quoted in the document give any consideration to the inherent protection that we have lost by pasteurisation.

One of our cheese-making books states that in a raw milk cheese, if bad bacteria are present, one will not get an edible cheese. This is the strong argument for pasteurisation, working with big quantities on cannot risk having a total failure. We work with small quantities, & have a ready use for failed cheese in our pigs.

I was glad to see that recognition has been made to the problem on an unlevel playing field in the cheese industry. We have to compete with heavily subsidised European traditional production, and carry a heavy burden of regulation. Raw milk cheese-making is an artisan activity which would help to maintain our position as a specialist, single-dairy, chemical-free producer. I am sure there are many others in Australia who would welcome the opportunity, but they haven't heard about the

proposal because it has not been circulated to the industry bodies. I only heard about it because I was at the Health Dept to discuss our Food Safety plan, & they realised I would be interested. Neither the DIAA nor the Specialist Cheese-makers Association seem to have heard about it. The timing is also awkward, covering the busy period leading up to Christmas and the holiday time following it.

Please forgive the poor submission, I too have been on holiday; but I would plead for permission for small producers like ourselves to be able to experiment with raw milk; maybe the finished product could be presented for assessment, both scientifically for health reasons and subjectively for its worth as a new Australian cheese.

Mrs A.K. Saunders

