

As consumers we are asking that raw milk for drinking and raw cream for direct consumption are included as products to be allowed to be produced and sold in its raw state.

Here are our considerations:

- The current standard 4.2.4 and the Proposal P1022 already establishes food safety control measures for the production of safe raw milk which is to be processed at a later stage. The pasteurization of raw milk is a safety measure that the standards ask for at the third stage where bulk milk has been collected from many different farms and mixed in milk tankers.
- As consumers we consider that it is in the mass transportation and processing of milk to make other dairy products where most of the biological hazards (i.e. bacterial contamination) are likely to occur and hence we agree that under such conditions pasteurization is a must. The science behind the health effects of both pasteurized and raw versions of milk on humans is still controversial but given the increasing concerns about pasteurized milk on human health, we believe that:
 1. pasteurized drinking "milk" is in itself a potential 'hazard'.
 2. pasteurization should only be done for bulk processing of milk for mass production of dairy products
 3. The definition of 'food safety hazards" should not be limited to contamination of food due to processing but also include the potential health effects of the processed product in itself.
 4. given that consumers are allowed to purchase and access food items that are widely known for their adverse health effects(i.e. soft drinks, sugary items), it should also be left to the consumer's consideration which version of milk to consume.
 5. given the potential changes that milk is subject to with pasteurization, the final product after processing should not be called "milk"
- A growing segment of consumers, like us, regards locally produced, organic and/or biodynamic and small scale dairy farming, in addition to the measures and requirements of the Standard 4.2.4 as well as the proposal P1022, as the safest option for the production of raw milk for drinking and raw cream for direct consumption. This is because we believe that:
 1. Organic and/or biodynamic farming increase the likelihood of milking cows being cared for according to their natural requirements, thus reducing the potential hazards related to feeding and maintaining the health of animals.
 2. Raw milk from a small local farm creates a feeling of trust in consumers as the farm and farmer are readily accessible to consumers as opposed to mass produced and bottled milk, for which the consumer does not and cannot possibly know where the milk comes from.
 3. Raw milk from a small local farm creates direct accountability to consumers who in turn become part of the body that helps enforcing and ensuring that the food standards rules and regulations are being put in place.
 4. Unpasteurized bulk processed milk for mass production of milk products from large scale dairy

farming is considered highly unsafe for human consumption.

5. Some consumers highly regard animal welfare as part of their consumption choices. Large scale dairy farming does not provide the level of welfare this segment of consumers are looking for, which is mostly asking for reduced artificial insemination and stress free weaning procedures. Small scale dairy organic and/or biodynamic farming is more conducive to such practices due to some ethical concerns farmers held personally and apply when running their businesses.
- Pasteurization is a safety measure applied specifically to dairy *processing for mass production of dairy products* not *primary production*. Our submission is mostly concerned about processed foods. We think it is possible, and hence we ask, that regulations and specific safety requirements are put in place to allow the sale of raw milk for drinking and raw cream directly from small scale primary producers (dairy farms.)

I would like to add a paragraph from an [article](#) in Dr. Mercola's famous website:

"Upon his deathbed, Louis Pasteur admitted his theory was not entirely correct. Instead, he conceded that physiologist Claude Bernard had it right.

Bernard said that microbes do exist, but that "terrain is everything."

"Terrain" refers to your body, and his theory means that it's not the microbes that determine whether or not you get sick, it's the health of the body in which they exist.

To prove his theory, Bernard reportedly then drank a glass of water filled with cholera to show that the germs wouldn't make him sick."

Some research on Dr. Bernard's work was done by Dr. Young in his book [Sick and Tired?: Reclaim Your Inner Terrain](#) and most of Dr. Bernard's original thoughts on this topic are found in his book [An Introduction to the Study of Experimental Medicine](#)

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