

Seamons, Colleen

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Sent: Monday, 15 September 2008 10:58 AM
To: submissions
Subject: Proposal P1007 - Primary Production and Processing Requirements for Raw Milk
Follow Up Flag: Follow up
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Submission: for Proposal P1007 - Primary Production and Processing Requirements for Raw Milk

Dear Sir/ Madam,

With regard to the Primary Production and Processing Requirements for Raw Milk (Proposal P1007)

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- FSANZ to reassess outdated science and non-science which condemns raw milk as a carrier of pathogens and consider science based recommendations for consumption of raw milk.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

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 suggest FSANZ use the members of The Nourished Community to continue their investigation into the demand for raw milk and our understanding of the science in that regard.

We do not confer with the current dogma that common scientists and micro-biologist 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 villified raw milk throughout the past few decades. Here are some facts which leads us to this conclusion:

- **Pasteurized 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 pasteurized 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 where as pasteurized 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..1
- **Arguments for pasteurization are based on a discredited medical paradigm..5** where the human body is a sterile machine and ill health is caused by invading and marauding micro-organisms.
- Tuberculosis has been proven to exist in two distinct strains, one being Bovine and one human. **Humans can not catch Bovine TB..11,12**
- **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 animal's who are healthy give milk that is more likely to repel pathogenic bacteria. We demand grass fed milk for this reason.
- **Even when milk is pasteurised, heat resistant pathogenic bacteria may remain..9**
- **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
- **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**
- Raw Milk has been shown to be **superior nutritionally to Pasteurised Milk..5**
- 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 40 degrees within one hour after milk is drawn from animals. No product will ever be exposed to heat above 102 degrees F 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 40 degrees until consumer sale (34-36 degrees 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 them squarely on the shoulders of the consumers, replacing punitive one-size-fits-all laws with 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.

**Kind Regards,
Charlie and Barbara Starrett**

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