



Standards Management Officer
PO Box 7186,
Canberra BC, ACT 2610.

6th September 2008

Submission

Re - Proposal P1007: Primary Production & Processing Requirements for Raw Milk Products.

The following comments are provided by Nourishing Australia Inc, a not for profit organisation that – amongst other things – educates people about the benefits of traditional foods compared to the modern refined and processed foods.

The key point that we would like to make is that raw milk produced from healthy cows is an excellent food and we commend FSANZ for providing this opportunity to revisit current legislation and hopefully to provide a set of standards under which raw milk products can be produced and marketed.

Australia and New Zealand are somewhat apart from both the US and the EEC on this subject. Raw milk offered for sale within and into the European Union has to be produced according to the requirements of Commission Directive 89/362/EEC (1) and to meet quality standards described in Council Directive 92/46/EEC (2, 3). More recently (July08) the UK published SI2008 allowing the continued sale of raw Milk in England. (http://www.opsi.gov.uk/si/si2008/uksi_20081317_en_1) We presume that FSANZ is well aware of these requirements.

While sale of raw milk is not permitted in all States in America, the industry has a body, Raw USA Standards, which sets out the requirements for Raw Milk Certification. These are:

1. No antibiotics may be used on a cow or other mammal from which milk is drawn within one year of producing raw milk intended for human consumption.
2. No growth or milk stimulating hormones may have been used at any time within one year of RAW USA certification.
3. No pesticides may be used on a raw milk cow or in her environment unless OMRI listed or USDA NOP compliant.
4. All USDA NOP standards apply as binding guidelines to the pasture environment care and conditions. All dairy pastures shall be USDA certified organic or USDA certified transitional.
5. All lactating animals that are producing raw milk for human consumption must be allowed access to pasture 150 days per year at a minimum and 100% of the time when possible.
6. Lactating animals must be provided a clean place to lie down and rest. All bedding areas should preferably be natural pasture or be something that the cow would find in a natural environment. Sawdust, straw, rice hulls and sand are examples that meet this requirement. Rubber and concrete do not meet this requirement.
7. No free stalls or loafing stalls are allowed.



8. Lactating animals must not be kept in crowded conditions and must be allowed to range freely, seek solitude and undisturbed rest.
9. There must be ample clean fresh water available and at no time may there be crowding occurring for competition to water access.
10. There must be adequate space available for the animal to experience all natural behaviours including: birthing, breeding etc.
11. All natural feeds shall be fed to the lactating animal. That includes only feeds that the animal would naturally eat in nature. This includes natural corn, barley, wheat or forages but not soy or cottonseed or other unnatural processed feeds. RAW USA standards emphasize green pasture as a major part of the ration and dried alfalfa and or dried grass forages as supplements. Some haylage made from available pastures or forages are permitted. Feed should be raised and certified organic if possible and if available. All feeds shall be of natural origins and part of the natural diet eaten by cows. For example, organic donuts, organic soybean meal and organic potato chips are not permitted.
12. Bacteria standards for RAW USA certified milk includes monthly testing for pathogens including the presence of Salmonella, Ecoli O157 H-7, Listeria Monocytogenes. If the local regulatory agency performs these tests then no additional tests are required.
13. Bacteria standards for raw milk includes testing for SPCs which shall be less than 15,000 SPC on a three out of five samples basis. Tests shall be completed one time per month. Any time a test is higher than the standard then tests will be increased in frequency to one time per week until tests show compliance with standards.
14. If the test sequence fails the standards then raw milk will not be sold to the public for human consumption until a test shows compliance with standards. Testing results must be kept for a minimum of three years
15. There are no Coliform, LPC or Somatic Cell Count (SCC) test standards for raw milk under these standards. All RAW USA standards meet or exceed the same standards as Grade A Raw Milk for human consumption in California under CDFA.
16. All animals in the herd must test negative for TB and Brucellosis on initial test and then once every two years. Any new additions to the herd must be tested prior to being added to the herd. All positives must be removed from the herd immediately.
17. All raw milk must be chilled to below 40 degrees within one hour after milk is drawn from animals. Immediate Flash or heat exchanger chilling is recommended. No RAW USA raw dairy 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.
18. All stored or packaged raw milk to be kept at or below 40 degrees until consumer sale (34-36 degrees is preferred).
19. All milking parlours 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. All hot water washes and cleaning of equipment and tanks shall be documented on a daily records log. If possible, a recording chart should be used to document temperatures and cleaning procedures.
20. All operations shall be rooted in social and environmental awareness. Fair wages and benefits, support of family and community life, investing in employee skills, and developing pride of artisanship are encouraged. RAW USA dairies should engage in environmental stewardship through ongoing development of sustainable, petroleum-independent farming



methods, and strive to pioneer positive solutions specific to the bioregional needs and resources of the local community.

The Raw USA website (<http://www.rawusa.org/index.html>) also lists its testing criteria that must be adhered to before Raw Milk can carry their certification. These are:

1. All samples shall be submitted to an approved dairy lab for testing. All test results shall be kept for a minimum of three years at the dairy where the milk is produced.
2. Test results shall be made available for inspection by any raw milk consumer or upon request by the RAW USA certification inspector.
3. At initial certification the dairy shall pass a checklist verified by an inspector from RAW USA.
4. At least annually a raw milk consumer that buys milk from the dairy must complete the RAW USA checklist.
5. Results of this people's inspection check list must be made available to RAW USA accompanied by pictures of the dairy, pastures, and cows, and copies of the preceding three months' test results. These reports and pictures may be posted at the RAW USA website for public review. This is mandatory for continued certification and use of the RAW USA certification.
6. One time every three years a RAW USA inspector will visit the dairy and assure compliance with protocols and standards.
7. If at any time test results indicate that a pathogen has been found, all raw milk sales must stop until a negative pathogen test confirms that no pathogens are in the milk samples drawn from finished bottled milk products ready for sale or from bulk tanks that supply that milk.
8. At initial certification, all MNP certified dairies must demonstrate and submit a series of 4 (SPC and pathogens) over a 2-month period where all test results are in compliance with all RAW USA standards. That means zero human pathogens and SPC counts less than 15,000 per ml.
9. Dairy must keep a file for any consumer complaints and that file must be made available to any inspector or consumer.

Nourishing Australia very much supports the sale of raw milk in this market under an appropriate set of standards similar to those listed above. We believe that they allow FSANZ to satisfy its risk issues as outlined in the Discussion Paper.

We agree that many of the bulk dairying methods used today do require pasteurisation of milk, however we strongly believe that consumers do have a right to be able to purchase and consume raw milk that has been produced within a set of standards similar to those listed above that will ensure raw milk is safe to consume. Refer to the Organic Pastures website (<http://www.organicpastures.com/labTests.html>) to see posted test results from this Organic Dairy that has supplied raw milk from its California dairy since 2000.

The following link is to an interview with Dr Ron Schmidt ND, a naturopathic physician and author of 'Traditional foods are your best medicine' and 'The untold story of milk'. The article gives a good



insight into the benefits of raw milk and some of the problems of pasteurised milk.

http://www.acresusa.com/toolbox/reprints/April04_Schmid.pdf

Nourishing Australia supports the consumption of raw milk for a number of reasons.

- Consumers have the right to choose the foods we eat and drink.
- Fresh, clean milk contains many beneficial components and has a long and rich history as a healing agent and builder of health . Many people who are so called 'lactose intolerant' or apparently allergic to milk can drink raw milk with no problems so should not be denied the benefits of milk in their diet.
- We are concerned that Australia has already lost too many dairy farms and farmers. Since deregulation small dairy farms have become less viable as businesses so have either changed to beef cattle production or the boom in land values has made it attractive for dairy farmers to subdivide and sell to city investors. The ability to make a better income through selling their milk at a premium will hopefully make remaining a small dairy farmer a more attractive proposition and help attract more young farmers to the industry.
- There are a growing number of people who are accessing and consuming raw milk. Many of these people and the farmers who supply them are currently having to operate outside the law. It would be far better for clean raw milk to be legally available to consumers and be provided legally by the farmers.
- There is ample evidence to show that raw milk can be produced and sold safely.

This submission has been approved by the Board of Nourishing Australia

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Posted last week: The Untold Story of Milk by Dr Ron Schmidt ND