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29/8/08
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Standards Management Officer
FSANZ
PO Box 7186,
Canberra BC, ACT 2610.

22nd August 2008

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

Dear Sir/Madam

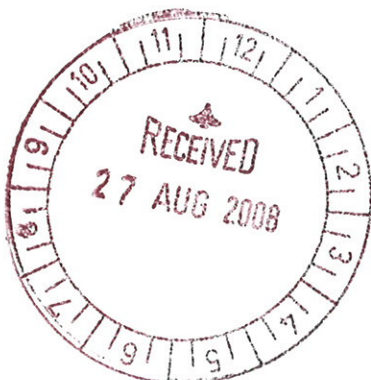
As I am a great believer in the superior nutritional and health benefits of raw milk and it s derivative products, I am including a submission for your perusal.

I wish you and your team much wisdom in arriving at a solution which hopefully will be of maximum benefit to the public.

Regards,



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Submission regarding Proposal P1007: Primary Production & Processing Requirements for Raw Milk Products.

I write this submission as a person not directly involved in the food industry nor the medical profession. However, having a background in the sciences (MSc. Melbourne University) and having read widely, particularly in the last few years, about the links between nutrition and health, I have formed strong opinions about what are the important factors involved in food preparation.

My interest in the general subject of nutrition began about 15 years ago when, after suffering from severe migraines for almost twenty years, an “alternative” practitioner diagnosed me as having gut dysbiosis caused by frequent use of antibiotics. A three month course of probiotics completely resolved the condition and I have not had a migraine since. I had previously seen numerous medical specialists, none of whom could help me.

The experience taught me several things.

Firstly, the mainstream medical profession does not always have the right answers to many medical conditions. This is not surprising as the human body is immensely complicated and at this point in time, we only understand a fraction of the total. I firmly believe that in the next 50 years or so we will get most of the answers.

Secondly, although the medical/pharmaceutical complex tries extremely hard, at great cost, to ensure safety of approved drugs and medications, it does little to test the long-term (i.e. period of 10 or more years) safety, simply because it is impractical to do so. In my case, long-term use of antibiotics because of a chronic bronchitis condition (bronchiectasis),

gradually destroyed too much of the beneficial bacteria in my gut, and as a result, non-beneficial bacteria proliferated, producing toxins every time I ate certain foods. Restoring the balance completely fixed the problem, and saved me from a life of misery.

In the case of raw milk, there are two competing principles: on the one hand, it is important to stop contamination of the milk either at the source, such as an unhealthy cow, or in the transporting of the milk to the end user; on the other hand, it is also important to maintain the nutritional value of the milk as much as possible. The process of pasteurization reduces or destroys many of the vitamins, completely eliminates the enzymes, and, according to some researchers, modifies some of the proteins.

Protagonists on both sides will argue vigorously about the technical details of the nutritional modification of the raw milk resulting from pasteurization, but there is no question that modification does occur and, leaving aside the question of freedom from possible contaminants, no-one would argue that it becomes a more nutritional food.

In my view, if some standards are introduced at the source side to reduce the already low probability of contamination, then we will end up with a better product. Why compromise.

After all, we have the same situation with other food products, such as meat and meat products such as sausages.

Before FSANZ considers banning of raw milk and some of its derivative products, such as cheese made from raw milk, they must prove that, on balance, the possible harm that may come from the occasional case of contamination, outweighs the taking away of day-to-day, continuous health

benefits that results from pasteurization. Raw milk is a natural and traditional food, so the onus is on FSANZ to prove that pasteurization is, overall, a better option.

By far the best approach is to introduce standards applicable to those producers that wish to supply raw milk, label the ensuing products accordingly, and allow the consumer to make an informed decision about which product to buy.

To completely remove the choice is discrimination of the worst kind – discrimination against good health.

Regarding the pasteurization of mature/hard cheeses, from what I have read, the fermentation process involved with its production of lactic acid helps prevent the proliferation of non-beneficial bacteria. As I lack expertise in this area, I do not know whether this is right or not. What I do know is that, coming from an Italian family, every day of our lives, every meal (except breakfast) has ended with a serve of some hard cheese (not cheddar). In all those years I have **never ever** heard of anyone in our family or friends of our family becoming ill as a result of eating cheese. On the contrary, my father died age 89, my mother is still alive and well at 93. As a matter of interest, she has been told recently that her bone density is higher than most 50 year old women. I believe part of the reason is the raw milk cheese she has consumed all of her life, and the raw milk she drank when she was a young person growing up in the mountains of northern Italy. If this is true, as I believe it to be, why would you want to trade it off to avoid maybe an upset gut once or twice in a life time (or never, as I have experienced). It makes no sense at all!

Summary

- Please do not eliminate a food and its derivatives that some people are totally convinced is beneficial for their health.

Rather

- introduce some standards for producers of raw milk and derivative products to ensure a consistently high quality product;
- have a requirement for clear labeling and explanation about the pros and cons of such products, allowing people to make an informed choice.

The forced elimination of a food such as raw milk without overwhelming and absolute justification is totally abhorrent in a democratic society such as ours.