

For Proposal No. P1007

Primary production & processing requirements for raw milk products

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Submission body

The following submission relates to the proposal relating to the Primary production & processing requirements for raw milk products.

In the assessment of the Proposal the recommendation is for the milk to be treated in such a manner such that bacteria is completely destroyed and that Category 2 and 3 are not permitted.

This response addresses the benefits of raw milk and potential harm that processing does. It also addresses the purpose of killing bacteria. Following this is addresses the need for people to have choice and way and means by which this can be achieved.

The health benefits of raw milk

Raw milk is one of the fundamentals for life... mammalian mothers feed their infants solely on this raw product for extended periods whilst the infants are forming and preparing to be able to consume other food products.

The raw milk provides minerals, nutrients, beneficial bacteria, enzymes and a loving bond. I dare say that the raw milk also provides other benefits to both human and other mammals in addition to what we know and understand.

This is so for raw milk – and is not applicable for pasteurised and homogenised milk – bacteria, enzymes and arguably the minerals and nutrients are all destroyed and / or damaged during the processing creating a ‘dead’ drink or food product.

It is interesting to note that human mothers don’t milk themselves and then cook and homogenise the milk before feeding it to their infants! Neither does any other animal for that matter.

As such, it should be considered that raw milk has health giving properties that processed milk cannot. As such, it should be available for consumption in its raw state.

Possible deterioration of milk safety and health benefits through processing

There also exists several arguments relating to the possible deterioration of milk safety and health benefits **after** raw milk has been process by pasteurisation and homogenisation.

These two concerns are as follows:

1. Homogenisation may cause fat (read cream) in milk to become damaging to the human body.

The process of homogenisation breaks the fat (read cream) down to tiny particles with the intention that they cannot reform and separate from the milk. This is purely so that people don't see the layers of cream and milk as well as other profit centred reasons.

An argument exists that suggest that the size of the fat particles become so small that the fat can enter the blood stream on its own accord and the body cannot control it. The argument also suggests that once in the bloodstream it can aggregate as plaque (read stick cholesterol on the walls of the arteries).

As such, the processing of raw milk by homogenisation may cause a health issue.

2. Pasteurisation kills all of the beneficial nutrients and bacteria.

It is also a known fact that pasteurisation kills most of the bacteria in the milk – both good and bad bacteria. This is why it is done... to destroy 99.9 percent or more of the bacteria so that it greatly extends the shelf life of the product.

This killing of the good bacteria may damage the many health benefits of raw milk and may even render the product as unhealthy.

In addition, it is also a known fact that the heat treatment of oil can create a product which is unhealthy and potentially damaging for human health. Potentially the same issue could occur with milk... the heat could damage the product and create a product which is damaging to health rather than nurturing it.

The purpose of milk processing

The main purpose of milk processing is to extend the milk's shelf life for distribution... in other words it is done for profit rather than the benefits it provides to product.

Another reason is for sloppy operators to get away with not appropriately cleaning the cows and equipment properly prior to milking and transportation of the milk.

There exists the need for choice

In light of the above, mandating that it is illegal to sell raw milk is archaic! It should be up to the individual to decide whether they want to consume it and take the risk.

As you can probably sense I am all for the raw milk movement. So much so, I drove down to Kangaroo Valley in NSW to purchase raw milk of the dairy farms. I was told that if I was to receive raw milk off a farmer then they were likely to receive massive fines and loss of their licences. This is ridiculous. I have still been unable to obtain such milk products legally.

I can buy "Milk for Bathing Purposes" of which is raw though. Who would put milk in a bath? No, people buy it because they want to drink raw milk.

If people want to consume raw milk it should not be made illegal.

I could also buy a cow – of which is difficult to house in suburbia – I have considered this though.

As such, the choice should be up to the individual.

Labelling and warnings

Instead of making the selling of raw milk illegal I am all for appropriate labelling; and, this labelling should go both ways.

Some examples should be:

1. **Warnings of potential hazards of processed milk.** Processed milk should have warnings that homogenisation and pasteurisation may create a product which is harmful for human consumption.
2. **Warnings of potential hazards of raw milk.** Raw milk packaging should have warning that raw milk may contain potential pathogens which may be adverse for human health.

This will allow people to make up their own minds as to whether they want to be consuming raw or processed milk.

I dare say that many companies will really get behind this and up their game creating products which are both safe and tap into the wonders of raw milk. What a world this may open up.

This labelling may indicate the category of milk – in accordance with the categories used in the report. Category 1 to 3.

Summary

In summary, raw milk has health benefits and processed milk may be harmful to consume. As such, raw milk should not be made illegal to sell – on the contrary, it should be made available.

Instead, people should be allowed to decide whether they purchase it for consumption or not. To do this, appropriate labelling should be mandated.

Lets create health rather than destroying it further.