

ACKNOWLEDGED

Seamons, Colleen

From: Jo Douglas [jo.douglas1@optusnet.com.au]
Sent: Thursday, 4 September 2008 11:16 AM
To: submissions
Subject: Re: Proposal P1007 Primary Production & Processing Requirements for Raw Milk Products

Re: Proposal P1007 Primary Production & Processing Requirements for Raw Milk Products (Australia only)

I would like to register my support for an amendment to the code to bring Australia into line with other major international cheese manufacturing countries. My objections to the current standards that prohibit the production and sale of most cheese made from raw milk in Australia are as follows:

1. The purpose of the Standard is to guarantee safe cheese – however the assumption that pasteurization as a single step will guarantee safety is not scientifically valid.
2. The single critical control point that guarantees safety for all cheese varieties is starter culture activity that creates a hostile environment to pathogens in the cheese. Starter culture activity comprises two biological components, the first is primary fermentation of milk sugar to organic acids during cheese making and the second is secondary fermentation/metabolism of organic acids, fat and protein during ripening. This principal is supported by scientific studies and accepted by all of the major cheese producing countries of the world i.e. European Union (EU), USA, and Canada.
3. The standard is anti-competitive and trade restrictive. The standard does not encourage world best practice in cheese/milk production and allows the use of milk of poor microbiological quality for cheese making.
4. The microbiological standards for cheese are overly onerous in relation to E.coli and have led to very questionable practices in domestic production. The standard is out of step with scientific studies and the microbiological standards applied in overseas countries.
5. The standard is a breach of Australia's commitment to WTO Policy, as it cannot be justified on scientific grounds for food safety. WTO Article 5.1 requires members to 'ensure that their sanitary or phytosanitary measures are based on an assessment, as appropriate to the circumstance, of the risks to human, animal or plant life or health, taking into account risk assessment techniques developed by the relevant international organizations'. Article 5.2 states in the assessment of risks 'Members shall take into account available scientific evidence'. Article 5.4 states 'Members should, when determining the appropriate level of sanitary or phytosanitary protection, take into account the objective of minimizing trade effects'.
6. The Standard is overly prescriptive. It does not meet the Council of Australian Government (COAG) guidelines on primary production and processing standards that stipulate an objective of minimal effective regulation.
7. The standard is highly discriminatory. It provides for international exemptions such as Roquefort and Swiss cheese but denies Australian cheese makers a choice of making similar cheese from raw milk. Australian artisanal cheese makers deserve to have the opportunity to develop a significant point of difference to enable their products to survive in a competitive market.
8. Over the past two decades international artisan and farmhouse cheese production has enjoyed a significant growth in demand due to a revolution in consumer interest. Many of these cheeses are made from raw milk and are recognised as having an infinitely superior flavour and

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regional character when compared to similar cheeses made from pasteurised milk. However unlike their overseas counterparts Australian consumers have been denied a choice of cheeses made from raw milk.

9. There is no reason why cheese made from raw milk should represent a greater degree of risk than those produced from pasteurised milk provided recognised international guidelines are adopted in Australia.

Kind Regards

Jo Douglas

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Seamons, Colleen

From: Jo Douglas [jo.douglas1@optusnet.com.au]

Sent: Thursday, 4 September 2008 11:55 AM

To: submissions

Subject: FW: P1007_Primary production and processing - Raw milk and Raw Milk Products

Scientific and Statistical Information supporting the Consumption of Raw Milk and its Products

I welcome this review and hope that it will clarify this area, provide a certification process for the production and handling of raw milk whilst allowing the underlying beneficial enzymes and nutrients to remain and providing the public with free choice over whether we wish to eat and drink raw milk and all its products particularly, butter, cream, yogurt and cheese.

I, along with my family, am a consumer of raw milk, raw butter, raw cheese and raw yoghurt and have been for a number of years now. I am a highly educated and professional person (business owner and manager, director, property investor and accountant) and do so for health and wellbeing reasons. I believe that the enzymes and nutrients it contains are extremely beneficial and are mainly lost through the process of pasteurization and that the safety of raw milk when subjected to rigorous hygienic production and handling processes is at the very least as safe a product to consume as that of pasteurised milk.

I attach a link to a power point presentation and document from the Weston Price Organisation of which I am a member, that provides substantial scientific information that support this view. These are Raw Milk and Raw Milk Products. Safety, Health, Economic, and Legal Issues and Response to the FDA.

<http://www.realmilk.com/ppt/index.html> and <http://www.realmilk.com/documents/SheehanPowerPointResponse.pdf>

Would you please review this information.

In addition, I shall post to you a book named "Raw Milk Production Handbook" by Tim Wightman and ask that you review this when considering a certification process that could be implemented.

Many Thanks,

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Seamons, Colleen

From: Jo Douglas [jo.douglas1@optusnet.com.au]
Sent: Thursday, 4 September 2008 12:03 PM
To: submissions
Subject: P1007_Primary production and processing - Raw milk and Raw Milk Products

RE Proposal P1007 – Review of Raw Milk and its Products

I welcome this review and hope that it will clarify this area, provide a certification process for the production and handling of raw milk whilst allowing the underlying beneficial enzymes and nutrients to remain and providing the public with free choice over whether we wish to eat and drink raw milk and all its products. I believe that the enzymes and nutrients it contains are extremely beneficial and are mainly lost through the process of pasteurization.

The following link <http://www.realmilk.com/expert-testimony-0508.pdf> is an extract from a court case in the US that defends the bacteria and safety of raw milk. I believe this information provides scientific support for the consumption of raw milk and supports the view that consumers should be allowed the choice to consume raw milk and raw milk products if they so choose. What makes it very interesting and particularly relevant to the Australian review is that the second witness, Ronald R Hull, worked in CSIRO for over 20 years with 15 or so of those years as head of the dairy microbiology section.

Many Thanks,

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