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

To whom it may concern.

We have in Australia a wonderful health regulatory body for foods. Many so-called well prepared foods, and raw foods have made people sick. Raw milk should not be toted out as 'the grim reaper'.

This wonderful food has been used for centuries. In clean environments it poses no problems. Scare mongering has given a prime source of food, a bad name. When pasturisation was first instigated not enough knowledge was known about the germs and the enzymes in milk that actually kill these germs.

Now that more research has been done, it is found that introduced pathogens into raw milk are actually killed by the raw milk.

I look forward to the health benefits from UN-adulterated milk, with its life giving elements/enzymes. I am a vegetarian. Proper raw milk will improve general overall health, not to mention better skin, hair, nails, digestive system (I use a lot of fermented milk product), muscle tone and bone density.

Raw milk organic farms also cut down the carbon footprint.

I consider that farm gate sales of milk no longer need to be outlawed, as our food laws have no business in interfering with private transactions occurring between a consumer and a food supplier. The risk borne by a consumer in this situation is negligible, and one they bear upon themselves. Where food is distributed beyond the farm, the consumer has no relationship with the supplier, and hence is dependent on our food authority to ensure standards are met. I believe that in this situation, FSANZ can recommend sensible protocol for safe practices.

8 <http://foodpoisoning.pritzkerlaw.com/archives/listeria-piney-ridge-dairy-milk-recall-and-duncanfarm-milk-recall-in-pennsylvania.html>

9 <http://www.animalhealthaustralia.com.au/aahc/index.cfm?7339E022-B68F-AB04-264EAAA1B958ED0D>

10 <http://www.meatupdate.csiro.au/new/Activated%20Lactoferrin.pdf>

Bovine brucellosis appears to have been eradicated in Australia, so too has bovine tuberculosis⁹ leaving only campobacter and salmonella as the other possible food borne pathogens that could possibly occur in raw dairy products. Campobacter and salmonella are pathogens that can be contracted from many sources, and raw dairy is possibly the least optimal vehicle for these microbes. The reason I suggest this is that it contains among other compounds –lactoferrin. This enzyme found in raw milk is now being used as a disinfectant in the meat industry. It is said to be effective against E Coli, Salmonella and even Listeria¹⁰ the occurrence of this antipathogen component in raw milk is nature's design to protect milk from passing pathogens to a young baby mammal.

Given that raw dairy is consumed safely most of the time around the world and in countries where it is legal, and even consumed safely in Australia by people with their own milking animals, we may assume that most of the time, raw dairy is safe. The exceptional cases should be examined for what went wrong rather than assuming that raw dairy is inherently unsafe. Given Australia's good track record in maintaining high food standards, there is no reason why we cannot benefit from the unique qualities that raw dairy provides to our food culture, without compromising on safety.

So it is with this issue. I do not expect the FSANZ review committee to endorse the consumption of raw milk, but recognise that it is a valid food choice, and provide the best framework so that those who want access to this food, to be in the most empowered position to get the best benefits of their choice and minimise any risks.

In terms of risk, I propose that the FSANZ committee consider the risks in comparison to any other food that is available to us. In this light, we should consider, not that risk must be reduced to zero for a food to be legal, but that risks should be generally negligible.

The consumption of raw plant foods is something that is increasingly encouraged by our diet gurus. Salads with green lettuce leaves and tomatoes, raw nuts, and fresh fruit are said to be the basis of a healthy diet. Yet, just like any raw food, they contain a risk of food borne illnesses. Lettuce leaves and tomatoes have both been implicated recently in outbreaks of salmonella, so too have peanuts. A recent outbreak in Salmonella was attributed to Rockmelons.¹

Furthermore, uncooked foods are by no means the only means of acquiring food borne illnesses. Food borne illnesses are regularly contracted from foods that have been cooked, undercooked, or reheated. Indeed, pasteurised dairy products are not free of risk for food borne illnesses, and while it could be argued that this only occurs because procedures were not properly followed, it is nevertheless a risk to the consumer, as no system is fool proof. While proponents of pasteurisation will maintain that illnesses contracted from

[1http://www.health.nsw.gov.au/news/2006/20061026_03.html](http://www.health.nsw.gov.au/news/2006/20061026_03.html) pasteurised dairy should not be considered as evidence that pasteurisation is not safe, we would like this argument to work both ways. Cases of illness contracted from consuming raw dairy products are not necessarily evidence that raw dairy is inherently unsafe, but just cases of bad preparation, human error or just plain bad luck that can be associated with any food.

Regards

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