

Seamons, Colleen

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To: submissions
Subject: Food standards submission

Categories: Blue Category

Submission regarding Proposal P1007 - Primary Production & Processing Requirements For Raw Milk Products

By **James Cutcliffe, Weston Price Chapter Leader, 265 Flaxton Drive, Flaxton 4560 , 0754786489, jame46@y7mail.com**

Overarching questions:

- 1) The overarching scope of the Proposal is assessing the safety of raw milk products using the Category Framework. FSANZ has undertaken a Technical Assessment based on three Risk Assessments (Raw Cow Milk, Raw Goat Milk and Raw Milk Cheese), a Consumer Study and Nutrition Assessment – Can you identify any aspects we have not covered at this point?

The Proposals exaggerate the risks of raw milk products.

They state that "Because of the potential for raw milk to be contaminated with pathogens, raw milk and products made from raw milk present a high level of risk to public health and safety if there are no control measures to manage the microbiological hazards that may be present."

It is a false assumption that the risks are "high level" for raw milk products. A more realistic description for raw milk products is "they present an *additional* risk to public health and safety compared with products made from correctly pasteurised milk".

- 2) We have summarised the impacts by option in Table 1 in the Report. Do you have any comments on the overall assessment? Can you identify other benefits and costs to the affected parties?

For raw milk cheese, the overall assessment seems to be far more alarmist than the technical assessment suggests. I consider that the technical assessment indicates that all soft cheese should be placed in Category 2, reserving Category 3 for raw drinking milk alone.

Consumers:

- 3) Would Australian consumers benefit from a greater range of cheeses and dairy products? Please provide details.

Yes, because we would be building food security for the Australian Community. We are building a broader employment base and encouraging the regional development of traditional skills. We are also giving support and stimulus to the smaller regional country centres. We acknowledge that the human race has survived for thousands of years prior to the industrial revolution, on these very same foods, which has been demonized by the so called scientific method of justification.

- 4) FSANZ has received comments that raw milk cheeses are likely to be gourmet, high-end market products. Costs associated with ensuring the safety of products may also be passed on to the customer - if raw milk cheeses were permitted:

- a. How much would you be willing to pay for such cheeses?

I disagree totally that such an assumption is possible when we are dealing with local producers producing for local markets in the same manner as it has done for thousands of years in various parts of the world.

Are you prepared to pay more if there are added costs in ensuring the safety of raw milk products?

We as consumers believe that the processes already in place by law are being upheld by all the primary producers who produce these products. If your question suggests that these standards that we the consumers believe the various government bodies are enforcing are not in place, then I would suggest that the various departments get there act together and give the public the assure they deserve. History has shown that Raw Milk from Grass Fed animals is able to produce a product that generates wellness.

Would you choose to purchase an Australian raw milk cheese over an imported equivalent?

Yes. By supporting my fellow countryman.

Australian artisanal cheese makers should not be restricted to the production of Category 1 and 2 cheeses. 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 are category 3 cheeses made from raw milk, and are recognised as having an infinitely superior flavour and authentic regional character when compared to similar cheeses made from pasteurised milk.

The purpose of the Australian Food Standards is to guarantee safe cheese – however the assumptions made in these proposals exaggerate the risks. There is no reason why ANY cheese made from raw milk should represent a greater degree of risk than those produced from pasteurised milk provided recognised international HACCP guidelines are adopted in Australia.

Australian Consumers deserve a choice similar to their counterparts overseas and products outlined in category 3 should apply only to raw drinking milk.

The proposals do not encourage world best practice in cheese or milk production and fail to take into account the difference between the quality of 'open ' market milk and the controls on milk quality on the farm for raw milk cheese .

The proposals do not address changes to Australian microbiological food Standards which are currently out of step with scientific studies and standards applied in overseas countries.

The proposals are anticompetitive and represent a breach of Australia's commitment to WTO:

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'.

The proposals are overly prescriptive and do not meet the Council of Australian Government (COAG) guidelines on primary production and processing standards that stipulate an objective of minimal effective regulation

As a Weston Price Chapter Leader I've had the privilege to be part of extensive network of citizens that have been using raw milk products daily for the past six years. To my knowledge, they have only experience positive health regenerating and wellbeing results.

Weston Price and many other researchers of the 1920's-1940's have meticulously documented the disastrous effects of industrial processes to natural foods.

We want foods that are as close as possible to that produced by nature.