

Seamons, Colleen

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To: submissions
Subject: Submission regarding P1007 first assessment report
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Submission regarding P1007 first assessment report

Dear Sir

I am sorry about my late submission, however I was awaiting a response from FSANZ regarding the implication they made that Campylobacter would grow in raw milk.

I have received a satisfactory response suggesting the committee is aware that the one peer-reviewed study known seems to suggest that this is not the case. While the committee does not recognise that their report appears to be suggesting otherwise, I am at least satisfied that the committee is aware of this study. In my response I received from Steve McCutcheon dated 12/2/2010, I am invited to make a submission despite the due date being passed.

My submission then is to question this idea that raw milk should belong to a category described as "high risk".

I have noted Steve McCutcheon's explanation of why he believes Campylobacter does not survive in raw milk compared to other pathogens he has noted. In particular he suggests Salmonella may grow in raw milk. In this I must agree there does appear to be some evidence that under warm conditions, salmonella do multiply, these studies that suggest this are available only online (http://wifss.ucdavis.edu/pdf/AVMA_mjay.pdf), and do not appear to have been peer-reviewed. If the FSANZ are willing to accept these studies which may support Steve McCutcheon's premise, then he will note that in these studies, Salmonella was not found to grow in raw milk that was kept chilled.

I accept that the mythical suggestion that raw milk kills pathogens is not a scientifically validated premise, however, I feel that in the statement the committee made, the complete opposite of this was implied. It is not my position that consumers should rely on the possibility that pathogens that may at times contaminate raw milk will be outright killed, however I challenge the suggestion that the committee made in determining that raw milk belonged to a "high risk " category.

The suggestion made was that undetectable levels of pathogens may somehow get into raw milk even when the best hygienic methods are deployed, and that these very low levels will multiply during the time the milk reaches the consumer.

Based on what we know about salmonella, this may be true but only if the milk is being stored unrefrigerated. It is my understanding that Salmonella can also survive as spores which are not destroyed by pasteurisation. If the ability of raw milk to grow Salmonella at room temperature is evidence that raw milk is a high risk food, then I can contend that pasteurised milk is not much safer.

Steve McCutcheon also mentions Listeria and E Coli. In the study I have noted above, neither E Coli or Listeria were not found to multiply in refrigerated milk, E Coli has a strange tendency to reduce in numbers at 4 days in refrigerated milk then recover slightly at 7 days, but nothing suggesting a major multiplication.

Again, these bacterial pathogens do have spore states that mean they will continue to be a danger even in pasteurised milk, if they were able to grow. The danger of pathogen contamination in raw milk then comes from either contaminants passed into the milk from an infected animal or contaminated after milking. It is generally thought that it is the latter possibility that may result in pathogen loads in raw milk. It is therefore feasible that safe milking practises would suffice in keeping pathogen contamination in milk close to zero or at least negligible for risk to human health.

If the FSANZ can accept this evidence as the best available, I think they would have to come to the conclusion that refrigerated raw milk is safe if it is produced from the dairy safely. Given that pathogens do not multiply uncontrollably, testing and monitoring could sufficiently determine the safety of a hypothetical certified raw milk dairy.

If FSANZ believes that it is impossible to produce raw milk safely because of bacterial contamination issues, then we must wonder whether FSANZ considers pasteurised milk perfectly safe when it can contain numerous pathogenic spores?

If there is a risk from consuming raw milk from hygienic certified dairies, what does the FSANZ quantify this risk to be? Is it way beyond the risk of most other foods available to consumers? I do not believe FSANZ or anyone really knows the answer to this as they do not cite this in their report. Given that Salmonella infections have occurred from consuming raw egg and raw rockmelons in the past ten years, I wonder if FSANZ has considered whether the sale of these products to consumers in their raw state represents an unacceptable risk?

I do not intend to make a mockery of this process with these rhetorical questions, but to make a plea for perspective.

I feel that the dairy industry deserves some more research into this issue rather than reliance on anecdotal evidence of raw milks supposed dangers. I see the report citing incidences of farmers getting sick who consumed raw milk, but the incidence of background sickness in dairy farmers who boil or buy pasteurised milk is not compared. Given that salmonella passes from animals to humans directly, or through flies etc, it is understandable that dairy farmers will contract sicknesses like these from time to time, but to cite only those incidences of farmers who consumed their own milk, is to not provide a full controlled scientific assessment.

I see that a simple test can be done, organic dairies that wish to become certified raw-milk suppliers should be chosen for testing to see whether their raw milk production could be considered safe for human consumption. These tests would not be expensive and could thoroughly test for levels of all known pathogens. The results of these experiments would provide an accurate assessment of this issue once and for all and a basis for a real scientifically based decision.

I am sure that those of us who campaign for raw milk and raw cheeses would welcome such an initiative.

Regards

Gordon Rouse

Bsc Honours

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