

Seamons, Colleen

From: Michael Byrne [mdbyrne@optusnet.com.au]
Sent: Wednesday, 24 February 2010 11:19 AM
To: submissions
Subject: Submission re Proposal P1007 - Primary Production & Processing Standard for Raw Milk Products

Categories: Orange Category

Dear Committee,

Thank you for the opportunity to make a follow-up submission regarding the Proposal P1007 - Primary Production & Processing Standard for Raw Milk Products.

There is much talk about the "potential for raw milk to be contaminated with pathogens" and the potential health risk. Given that people are already consuming raw milk one would reasonably expect that there would be many cases of illness reported daily as a result of these pathogens if the actual risk was as high as the report suggests. However, this does not appear to be the case and certainly, of those we know who consume raw milk, none have become ill as a result of drinking it for years. If the legislation was changed so that raw milk could be freely purchased it would not adversely affect public health.

Raw milk is of interest to a small percentage of the population for a number of reasons including those outlined in one of the papers in the assessment report. These people will still source raw milk regardless of the legislation and it would be a gross injustice to deny them the choice to obtain raw milk legally especially when mankind has been drinking it for millennia.

I think everyone accepts that raw milk contains more micro-organisms than pasteurised milk but that is not necessarily a bad thing. As one of the papers noted, when raw milk goes off, it does not turn sour in the same way that pasteurised milk does and in fact it becomes a type of cottage cheese. Our society today is obsessed with eliminating all bacteria hence the rise of anti-bacterial wipes etc. As has been highlighted in other places this has caused problems because the body is encountering far fewer foreign organisms and is not developing the natural immunity to disease that it should. In some cases, it has caused the immune system to start attacking the body itself. Allowing people to consume raw milk goes against the anti-bacterial "tide" but would not be detrimental to public health.

I would like to see legislation which provides for people to have a free choice in their consumption of dairy products. In particular they should be free to choose to consume raw milk products whether purchased at the farm gate or in a shop or restaurant. It should not matter what their reasons are. If the products are sold in shops or restaurants they would need to be clearly labelled as "Raw Milk", "Made from Raw Milk" or "Contains Raw Milk".

In terms of the hygiene at the dairy. It should not matter whether the milk will be pasteurised or not. There should be a common protocol in place. For example, it could be a requirement that the udder and teats of all cows be washed before milking to reduce the risk of contamination. The cows should not have been injected with any medications or antibiotics before milking.

My final comment concerns the perception of legislation. Legislation must be consistent or it will be disregarded by many. This review of the Raw Milk products is ostensibly being undertaken in the interests of public health and that is commendable. However, I have read numerous articles on the dangers of irradiating food and recently heard that cat food was no longer being irradiated because cats were dying, yet irradiated food is still on the human menu. That simply does not make sense.

The review of raw milk products is closely scrutinising something that has been part of the human story for thousands of years - in fact, we would not have cheese at all if milk had to be pasteurised back then. If FSANZ is looking this closely at raw milk, there should be a similar scrutiny of Genetically Engineered foodstuffs rather than simply relying on the manufacturer's data. GMOs do not have a history of thousands of years of human consumption and are far more unknown than raw milk.

The proposal is seeking to "manage the risk posed by raw milk". I would argue that the risk is already being managed quite adequately since raw milk is currently being consumed or, more accurately, the risk is not as great as we have been led to believe.

I would urge the committee to allow consumers the choice to purchase raw milk products.

Thank you.

Yours sincerely

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