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Living Foods For Life

Division of Dockets Management
FDA, Department of HHS
5630 Fishers Lane, rm. 1061
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November 18, 2013

Docket: FDA-2013-P-0701/CP1, Citizens Petition

Dear FDA reviewer,

Organic Pastures Dairy Company submits additional information as a supplement to its pending citizen's petition that is currently at the FDA under Docket: FDA-2013-P-0701/CP1.

The information contained in this supplement, attached hereto, was not available at the time of the original Petition's submission in May of 2013, claimed by FDA to have been received on June 5, 2013. We believe that this information will be very helpful to the FDA in its effort to assess the merits of the primary Petition and its request to partially or conditionally remove the interstate ban on Raw Milk shipments. This narrow request is for raw milk that is specifically produced as intended for human consumption and not raw milk that is intended for pasteurization.

This package contains the following:

1. "Michigan State Fresh Unprocessed Whole Milk Workgroup Report". This 90 page raw milk report was written after six years of collaborative effort by a combined group of private, university, pasteurized milk industry and Michigan state regulators.
2. "Journal of Nutritional Ecology and Food Research", article by Dr. Ton Baars PhD. This peer reviewed and internationally published article combines many of the European studies on raw milk and concludes that raw milk intended for human consumption is entirely different than raw milk that is intended for pasteurization and cites safety analysis, additional examples and data.
3. "The German System" of raw milk production including its standards. It has been reported in the articles submitted that no illnesses have resulted from consumption of German Raw Milk "Vorzugsmilch" in the many decades of national consumption. Under the German raw milk system, raw milk for human consumption is treated differently than raw milk for pasteurization. Both have different standards and systems of controls.
4. Data from the Raw Milk Institute (RAWMI). RAWMI was established in 2010 to address the growing need for national and international raw milk standards and testing. Data

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from the first four RAWMI LISTED dairymen is included and clearly shows that it would be nearly impossible to cause Ecoli illness from this RAWMI raw milk. When coliforms are near zero or zero, it is not possible for Ecoli pathogens to cause illness. In fact, the PMO allows up to 10 coliforms per ml in pasteurized milk (post pasteurization standards allow up to 10 living coliforms and those coliforms may include Ecoli pathogens, because no pathogen testing is performed post pasteurization). In the RAWMI data you will find that the average coliforms are less than 2 with most results at non-detect or zero. Each RAWMI producer uses a RAMP (Risk Analysis Management Plan) to identify and control risks from Grass to Glass. Each producer also tests their products routinely. No illnesses have been reported from any RAWMI dairy since its beginning.

5. Data from Organic Pastures Dairy Company that spans 2002 to 2013. This data includes pathogen tests, Standard Plate Counts and Coliforms. Some of the CDFA test data has been included as well. This data shows clearly that when raw milk standards are applied that are tighter than those standards for pasteurized milk, the results are strikingly different and the products are indeed a low risk food.
6. A "Journal Sentinel" article reporting that in June or July of 2013 three deaths occurred from pasteurized dairy products. There are no recorded deaths from US produced fluid raw milk recorded in the data at the CDC. The FDA has steadfastly stated that pasteurization is a "guarantee of safety". It appears that pasteurization is not perfect, and certainly not a guarantee of safety, Just as no other food is perfect either.
7. May 2013 New York Times article that reports on the critical and essential importance of bacteria in and on our bodies. The Times article quotes NIH projects and others that prove the essential role of bacteria and how when they are missing, we become gravely ill. In historic times, raw milk and other raw dairy products played a central role as the source of essential biodiversity that is the core of the human immune system as reflected as the GUT FLORA.

Please add this supplemental information and data contained in this package to the Petition docket that is pending review.

Most kind regards,


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