December 13, 2006

Position Statement
of the Association of Food & Drug Officials on
Raw Milk

For over 110 years, the Association of Food and Drug Officials (AFDO) has endeavored to create uniformity among government regulatory agencies at all levels. By building consensus with program managers at the state and local levels, AFDO is able to establish united positions on national food safety matters that affect all of us. It is in this spirit of uniformity that AFDO is pleased to offer our comments on mandatory pasteurization for milk and milk products.

AFDO supports mandatory pasteurization for all milk and milk products intended for direct human consumption except where alternative procedures to pasteurization are provided (i.e. curing of certain cheese varieties) to ensure the safety of finished products.

Raw milk has been known to be a vehicle for disease organisms for more than 100 years. There are numerous documented outbreaks of milkborne diseases involving Salmonella and Campylobacter infections directly linked to the consumption of unpasteurized milk in the past 20 years. Since the early 1980’s, cases of raw milk-associated campylobacteriosis have been reported in the states of Arizona, California, Colorado, Georgia, Kansas, Maine, Montana, New Mexico, Oregon, and Pennsylvania. An outbreak of Salmonellosis, involving 50 cases was confirmed in Ohio in 2002. Recent cases of E. coli 0157:H7, Listeria monocytogenes and Yersinia enterocolitica infections have also been attributed to raw milk consumption. In December 2005, 18 people in Oregon and Washington, mostly children, were infected with E. coli 0157:H7 due to consumption of raw milk from a Washington state Dairy. Two of the children remained in intensive care for approximately a month.

Although some individuals or consumers extol the health benefits of raw milk, there is no objective evidence that milk pasteurization has any adverse effect on human nutrition or health. These individuals advance a number of arguments that allude to the health benefits of raw milk, but they are either anecdotal or unsupported by scientific fact, while it has been scientifically and repeatedly demonstrated that raw milk consumption represents a substantial risk of infectious disease.

The hazards of raw milk consumption are recognized by most states. Raw milk sold through commercial channels for human consumption is illegal in all or part of 42 states. Public health organizations such as the U.S. Animal Health Association, the National Association of State Public Health Veterinarians, the Council of State and Territorial Epidemiologists, the American Academy of Pediatrics and the House of Delegates of the American Veterinary Medical Association have adopted policy statements that milk for human consumption should be pasteurized.

Foodborne illnesses related to the consumption of fresh, soft, raw milk cheeses such as queso fresco and queso cotija point out the hazards of consuming raw milk.
milk products. These products are popular among people from societies where milk pasteurization is not as common as in the United States, and the product is distributed mainly through unregulated practices. While mandatory pasteurization requirements will not stop black market distribution, they will curtail mass distribution and facilitate raising the awareness of potential consumers.

Respectfully Submitted,

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