



Association of Food and Drug Officials

2550 Kingston Road, Suite 311 York, PA 17402
Telephone (717) 757-2888 Fax (717) 755-8089
E-Mail: afdo@afdo.org Internet: www.afdo.org

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

President

Charlene W. Bruce
MS Dept. of Health
570 E Woodrow Wilson
P.O. Box 1700
Jackson, MS 39215-1700
(601)576-7689
(601)576-7632 FAX
cbruce@msdh.state.ms.us

President-Elect

Steve Steingart
Allegheny Co. Health Dept.
3901 Penn Ave.
Pittsburgh, PA 15224
(412)578-7935
(412)578-8190 FAX
ssteingart@achd.net

Vice-President

Gerald Wojtala
MI Dept. of Agriculture
525 W. Allegan
Lansing, MI 48933
(517)373-1060
(517)373-3333 FAX
wojtalag@michigan.gov

Secretary-Treasurer

Ellen Laymon
OR Dept. of Agriculture
635 Capitol Street, NE
Salem, OR 97301
(503)986-4720
(503)986-4729 FAX
elaymon@oda.state.or.us

Director of Public Policy

J. Joseph Corby
NY Dept of Agriculture & Markets
10 B Airline Drive
Albany, NY 12235
(518) 457-4492
(518) 485-8986 FAX
Joe.Corby@agmkt.state.ny.us

Executive Director

Denise C. Rooney
Association of Food and Drug
Officials
2550 Kingston Road
Suite 311
York, PA 17402
(717) 757-2888
(717) 755-8089 FAX
drooney@afdo.org

AFDO Position on Raw Milk
December 13, 2006
Page 2

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,

A handwritten signature in cursive script that reads "Charlene Bruce". The signature is written in black ink and is positioned above the printed name and title.

Charlene Bruce
President