



Raw Milk Policy Development 2013

Issue:

After much debate, a large majority of delegates to the 2013 AFBF Annual Meeting approved new policy language in support of only pasteurized milk and milk products being sold or distributed for human consumption. Most of the discussion in favor of the policy addition centered on the potential risks to public health posed by consumption of raw milk. Five states (Connecticut, Massachusetts, New York, Pennsylvania and Vermont) subsequently dissented from AFBF policy.

States currently have the authority to govern the sale of raw milk inside their boundaries and some states do allow in-state sales of raw milk. Because AFBF policy is focused on issues at the national level, intrastate regulation is not affected. Raw milk is not currently the subject of any proposed national legislative or regulatory action.

Questions:

Should state programs that inspect and provide for the sale of raw milk and milk products within the state, and clearly labeled with acknowledged food safety risks, be addressed in and allowed by AFBF policy? Federal provisions allow for the interstate sale of cheese produced through adequate aging or other processes that kill food-borne contaminants. Since cheese conforming to these standards has not been a food safety risk, should AFBF policy formally recognize the safety of these products just as the federal government does?

Should AFBF policy language that specifically opposes raw milk sales for human consumption be further clarified to stipulate that it only applies to national and interstate sales of milk and milk products?

Recognizing that both the Centers for Disease Control (CDC) and the Food and Drug Administration (FDA) consider pasteurization necessary for food safety reasons, should the current language be retained?

Background:

One of the first laws requiring pasteurization of milk was introduced in Chicago in 1908. The primary focus of pasteurizing milk then – as well as now – was to control or limit pathogens such as tuberculosis. According to the FDA, pasteurization kills harmful bacteria and saves lives without reducing milk's nutritional value. A major concern of conventional milk producers and processors regarding raw milk and raw milk products is that any foodborne illness outbreak related to dairy products damages consumer perception of milk in general, even when the source of the problem is clearly attributed to raw milk or raw milk products. For example, a Feb. 10, 2013, article in the Milwaukee Wisconsin Journal lead with, "Dairy products accounted for more food-borne-illness hospitalizations over an 11-year period than 16 other commodity foods, says a new study from the Centers for Disease Control and Prevention." The same article later quoted the Center for Science in the Public Interest as saying, "The risk from dairy products has increased in recent years with the rise in popularity of unpasteurized raw milk and cheeses. People who consume unpasteurized dairy products have no protection from hazards like E. coli 0157 and salmonella that are commonly found in dairy cattle."

Consuming raw milk or raw milk products is not without risk. The FDA has serious food safety concerns regarding raw milk consumption. A CDC study released in February 2012 examined the number of dairy outbreaks in the United States during a 13-year period. Between 1993 and 2006, 60 percent (73/121) of dairy-

related outbreaks reported to CDC were linked to raw milk products. Given that less than 3 percent of the population consumes raw milk/products, foodborne risk is clearly far greater in raw milk and raw milk products than for pasteurized goods.

The CDC also reports that unpasteurized milk is 150 times more likely to cause foodborne illness and results in 13 times more hospitalizations than illnesses involving pasteurized dairy products. States where the sale of raw milk was legal had more than twice the rate of foodborne illness outbreaks compared to other states. In addition to the CDC, the American Medical Association, the American Academy of Pediatrics, the National Conference on Interstate Milk Shipments, the National Association of State Departments of Agriculture, the Association of Food and Drug Officials and other organizations have endorsed the pasteurization of milk and restriction of the sale of products containing raw milk.

Proponents of raw milk point to a belief that it is more digestible than pasteurized milk or that it has a higher nutritive value than pasteurized milk or milk products, among other benefits. However, the FDA reports that pasteurizing milk does not cause lactose intolerance and allergic reactions; both raw milk and pasteurized milk can cause allergic reactions in people sensitive to milk proteins. Research shows there is no meaningful difference in the nutritional value of pasteurized and unpasteurized milk.

Raw milk and raw milk products are being sold at a price premium compared to conventional milk and milk products, due to these perceived quality differences. Small dairy farms (cow, goat and sheep) and those just moving into on-farm processing have found a strong market for raw milk cheeses. In the often challenging dairy market these value-added products allow farms to diversify and expand their businesses. For consumers who believe in the benefits of raw milk consumption, this is a highly emotional issue. It transcends any documented food safety concern. They believe they have a right to consume a raw product and fight with tenacity any effort to remove this product from the marketplace. Due to the conviction of raw milk believers, this issue has become associated with freedom and food choice vs. the perceived evils of an industrial food system. Since there is no federal law permitting (or prohibiting) raw milk sales, states have taken individual and extremely varied approaches to what is legal within their state. According to a 2011 survey conducted by the National Association of State Departments of Agriculture, 30 states allow some form of raw milk sales and 13 of those restrict legal sales to occur only on the farm where the milk is produced. Twelve other states allow the sale of raw milk at retail stores separate from the farm. Five states restrict the availability of raw milk to special markets or have compound regulations.

CDC - <http://www.cdc.gov/features/rawmilk/>

Dangers of Raw Milk - <http://www.fda.gov/Food/ResourcesForYou/Consumers/ucm079516.htm>

A Campaign for Real Milk - <http://www.realmilk.com/>

Raw Milk Facts - <http://www.raw-milk-facts.com/index.html>

Real Raw Milk Facts – <http://www.realrawmilkfacts.com>

Farm Bureau Policy:

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Lines 86-87 – [We support] Only pasteurized milk and milk products being sold or distributed for human consumption.