

Position Statement Regarding the Sale and Distribution of Raw Milk

Adopted: August 31, 2010

The Canadian Institute of Public Health Inspectors' National Executive Council has recently adopted this position statement in opposition to the sale or distribution of raw milk. CIPHI strongly supports the pasteurization of raw milk prior to consumption.

Raw milk has the potential to spread a number of disease-causing organisms including but not limited to Enterotoxigenic *Staphylococcus aureus*, *Salmonella* species, *Campylobacter jejuni*, *Escherichia coli* (*E. coli* 0157:H7, Enterohemorrhagic *E. coli* – EHEC, Enterotoxigenic *E. coli* – ETEC), *Mycobacterium tuberculosis*, *Mycobacterium bovis*, *Listeria monocytogenes*, *Yersinia enterocolitica*, *Coxiella burnetii* and *Brucella* species (*B. abortus* being mainly associated with cattle and *B. melitensis* being mainly associated with goats) (Sheehan, 2007). These bacteria can cause severe illness ranging from fever, vomiting and diarrhea to life-threatening kidney failure, miscarriage and even death (Health Canada, 2009). Other impacts to society include increased sick days resulting in decreased work production, increased medical costs to treat the illness and associated chronic conditions, and finally emotional and economic distress to those affected. These impacts are unnecessary and preventable by ensuring that all milk is pasteurized prior to consumption.

The principle mechanism to control the presence of disease-causing organisms in milk is pasteurization, which normally involves heating the milk for 15 seconds at 72°C. Pasteurization of milk was established in the early 1900s to combat tuberculosis and brucellosis (Food Safety Network, 2010). As a result, the number of cases of these milk-borne diseases has dramatically decreased wherever pasteurization was introduced. Prior to pasteurization, milk products caused approximately 25 percent of all food-related disease outbreaks in the United States resulting in a number of deaths (Weisbecker, 2007). Nowadays, milk products are implicated in fewer than 1 percent of all food-borne outbreaks (National Environmental Health Association, 2008), but data from 1998 to 2007 indicate that 80 percent of these are caused by raw milk or raw milk cheeses (Centre for Science in the Public Interest, 2009).

While private farming families sometimes consume raw milk or raw milk products produced on their property, the sale of unpasteurized milk has been illegal throughout Canada since 1991 under the Federal Food and Drug Act. Several provinces have also established Acts and Regulations to ensure the safety of the milk supply. The consumption of raw milk, however, continues to occur, either illegally through sale or distribution from the farm or through animal-share or herd-share operations. In these deliberate attempts to circumvent the legislation, consumers pay a farmer to board their “part-owned” cow or goat, and to milk it for them. Cases of milk-borne illness frequently occur as a result. In North America, from 2000 to 2009, there were a total of 26 outbreaks resulting in an estimated 545 illnesses, more than 23 hospitalizations and 7 infant deaths (British Columbia Centre for Disease Control, 2010). In Ontario alone, from 2005 to 2007, there were 92 cases of illness associated with the consumption of raw milk and raw milk cheese (Ontario Ministry of Health and Long-Term Care, integrated Public Health Information System (IPHIS) database, 2008).

Advocates of raw milk consumption claim that “healthy cows create healthy milk” and that “modern stainless steel tanks, milking machines, refrigerated trucks, and inspection methods make pasteurization absolutely unnecessary for public protection” (Weston A. Price Foundation, n.d.). The truth is that milk can become contaminated at several stages in the milking process including the animal’s teat canal, the surface of the udder, the milking equipment, and the milking personnel (Food Safety Network, 2010). Milk can also be contaminated at numerous locations between the farm and the consumer. Strict government regulations are therefore in place to minimize the potential for contamination along this chain.

In recent years, organizations such as the Weston A. Price Foundation, the Natural Milk Coalition of Canada, and the Canadian Alliances for Raw Milk have emerged promoting raw milk consumption. They also make unsubstantiated and false claims regarding 'health benefits' supposedly achievable by drinking raw milk and insisting that the consumption of pasteurized milk causes more harm than good. Furthermore, they make unsupported statements that raw milk sales will "save the family farm" (Weston A. Price Foundation, n.d.). These organizations are attempting to overturn state and provincial regulations prohibiting the sale of raw milk.

The Canadian Institute of Public Health Inspectors recognizes the benefits of milk consumption, and it further recognizes the overwhelming scientific and historical evidence that raw milk can transmit disease-causing bacteria to the consumer. Raw milk can be contaminated at several stages of the milking process and pasteurization is an effective and efficient method of minimizing these milk-borne diseases. Furthermore, as the degree of risk and the potential consequences may not be well understood by some of those purchasing or consuming this product, CIPHI endorses strong legislation restricting the sale of raw milk to protect vulnerable populations such as children, who may not have a choice in the food that they eat.

Several other well respected regulatory and public health organizations have issued position statements regarding the dangers of consuming raw milk. These include:

- American Association of Public Health Veterinarians (AAPHV)
<http://www.dairy.state.nv.us/Position%20Statements/PUBLIC%20HEALTH%20VETERINARIAN%20COALITION%20COMMITTEE.pdf>
- Health Canada
<http://www.hc-sc.gc.ca/fn-an/securit/facts-faits/rawmilk-laitcru-eng.php>
- International Association for Food Protection
<http://dairy.state.nv.us/Position%20Statements/International%20Association%20for%20Food%20Protection%20position%20statement%20Final.pdf>
- National Environmental Health Association (NEHA)
http://www.neha.org/position_papers/position_raw_milk.htm
- U.S. Food and Drug Administration (FDA)
<http://www.fda.gov/Food/FoodSafety/Product-SpecificInformation/MilkSafety/CodedMemoranda/MemorandaofInformation/ucm079103.htm>

To conclude, CIPHI strongly opposes any legislation that would allow for the sale or distribution of raw, unpasteurized milk to the consumer. CIPHI has been active in advocating for sound public health policy across Canada with government departments and public health stakeholders. This position is taken solely in the interest of protecting public health and preventing/minimizing the potential for diseases associated with raw milk.

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