

National Milk Producers Federation

Please see attached letter for comments.



February 22, 2022

Submitted via public comment form

Shannon Miller
Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

Re: NMPF and IDFA Oppose Legalizing the Sale of Raw Milk in Alaska

Dear Ms. Miller,

The National Milk Producers Federation (NMPF) and the International Dairy Foods Association (IDFA) oppose any proposed changes to the current raw milk regulations designed to further advance the sale of raw milk and raw milk products, including allowing the sale of raw milk in Alaska. Consumption of raw milk and raw milk products has been opposed by every major health organization in the United States, including the American Medical Association and the American Academy of Pediatrics.

Consumption of raw milk and milk products is a demonstrated public health risk. The link between raw milk and foodborne illness has been well-documented in the scientific literature, with evidence spanning nearly 100 years. Raw milk is a key vehicle in the transmission of dangerous and sometimes deadly human pathogens, including *E. coli* O157:H7, *Campylobacter*, *Listeria monocytogenes*, and *Salmonella*.

Based on a 2012 report from the Centers for Disease Control and Prevention (CDC), between 1993 and 2006, unpasteurized dairy products resulted in 73 known outbreaks- causing 1,571 cases of foodborne illness, 202 hospitalizations and 2 deaths.¹ Most recently, analyzing data collected between 2009 and 2014, researchers concluded that unpasteurized milk is 840 times

¹ Langer, AJ, et al. Non-pasteurized dairy products, disease outbreaks, and state laws – United States, 1993-2006. *Emerging Infectious Diseases*. 2012 18(3):385

more likely to cause food-borne illness than pasteurized milk, and such illnesses have a hospitalization rate 45 times higher than those involving pasteurized dairy products.²

The CDC has reported nearly 81% of raw milk-associated outbreaks have occurred in states where the sale of raw milk was legal. Eliminating the regulations that currently restrict the sale of raw milk in Alaska increases the risk to public health, opening up the state's consumers to the inevitable consequences of falling victim to foodborne illness. No matter how carefully it is produced, raw milk is inherently dangerous. Americans have become ill after consuming raw milk and raw milk products obtained from farms of varying sizes, from cow-share programs, and from licensed, permitted or certified raw milk producers.

Nearly two-thirds of all outbreaks associated with raw milk or raw milk products involve children. For example, in 2011, five children in California were infected with *E. coli* O157:H7 after drinking raw milk; three required hospitalization with hemolytic uremic syndrome (HUS). At a school event in Wisconsin, also in 2011, sixteen fourth grade students and adults who drank raw milk donated by a parent later suffered from diarrhea, abdominal cramping, nausea, and vomiting because of *Campylobacter* infections. In 2018, Tennessee experienced an *E. coli* outbreak which sickened a dozen or more children, including four who developed kidney failure. Several children spent more than 50 days in the intensive care unit at Tennessee Children's Hospital. It is the responsibility of Alaska's leaders to make decisions to protect the health of the public, most especially those who are minors and are unable to make fully informed decisions that could have profound consequences on the rest of their lives.

One critical aspect of this high-profile issue is the tremendous amount of misinformation that has been disseminated regarding the supposed health benefits of raw milk. It is important to emphasize that no claim related to the health benefits of consuming raw milk has been substantiated in any of the medical literature. The scientific consensus is that raw milk can cause serious illnesses and hospitalizations, as well as result in life-long negative health complications and death.

Another misleading claim is that testing or regulating the sale of raw milk will protect consumers from the risks of raw milk consumption. This is also unfounded. Product testing and no amount of added procedures on-farm can ensure the same level of safety as pasteurization. Legalizing and regulating the sale of raw milk sends a signal to consumers that drinking unpasteurized milk is safe when, in fact, the opposite is true.

Nationally, our dairy industry benefits from a very high degree of consumer confidence-confidence built in large part due to the excellent food safety of milk and dairy products. Current statistics estimate only 1-2% of reported foodborne outbreaks are attributed to dairy products. However, of those, over 70% have been attributed to raw milk and inappropriately-aged raw

² Costard, S., Espejo, L., Groenendaal, H., Zagmutt FJ., Outbreak-related disease burden associated with consumption of unpasteurized cow's milk and cheese, United States, 2009-2014. *Emerging Infectious Diseases*. 2017; 23(6):957.

milk cheeses. In a 2007 report, the CDC concluded that “State milk regulations and methods for their enforcement should be reviewed and strengthened to minimize hazards of raw milk.”³

Authorizing the sale of raw milk would be a step in the wrong direction and create unnecessary food safety risk for consumers and liability for dairy producers.

While choice is an important value, it should not pre-empt consumers’ well-being. To authorize the sale of raw milk and raw milk products is an unnecessary risk to consumer safety and public health. As such, we strongly oppose any changes to regulations which would legalize the sale of raw milk in Alaska.

Please do not hesitate to contact us with any questions or if we may be of further assistance.

Sincerely,



Clay Detlefsen
Senior Vice President and Staff Counsel
National Milk Producers Federation



Dave Carlin
Senior Vice President, Legislative Affairs
International Dairy Foods Association

The National Milk Producers Federation (www.nmpf.org), based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF’s cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 30,000 dairy producers on Capitol Hill and with government agencies.

The International Dairy Foods Association (www.idfa.org), Washington, D.C., represents the nation’s dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate \$159 billion in wages and \$620 billion in overall economic impact. IDFA’s diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers. Together, they represent 90 percent of the milk, cheese, ice cream, yogurt and cultured products, and dairy ingredients produced and marketed in the United States and sold throughout the world.

³ Bhat, M, et al. *Escherichia coli* O157:H7 Infection Associated with Drinking Raw Milk- Washington and Oregon, November- December 2005. MMWR. 2007; 56(8):165.