

From:

Marion Nestle

*Safe Food: The Politics of Food Safety*. Berkeley: University of California Press, 2010 (in press).

### The Raw Milk Debates

Although dairy foods account for only 3 percent of reported cases of foodborne illness, a whopping 71 percent of those cases are caused by pathogens in raw milk.<sup>1</sup> Raw milk creates little dread or outrage in the public, but it enormously distresses health officials. Because pathogens are easily killed by pasteurization, deaths caused by pathogens in raw milk are easily prevented.

Safety scientists are baffled by the raw food movement, whose constituents believe—against all evidence—that raw milk is healthier and safer than pasteurized milk. To read the statements of raw milk advocates is to enter a parallel universe in which the usual standards of scientific judgment are thoroughly discounted. Such views are most prominently expressed by the Weston Price Foundation, named after the author of *Nutrition and Physical Degeneration* (1939). With considerable justification, Price argued that many of today's chronic diseases could be prevented by avoiding highly processed and refined foods.

The foundation, however, interprets this advice as "avoid

pasteurization." It recommends "raw whole milk from grass-fed cows . . . produced under clean conditions and promptly refrigerated." One would hope that by "clean conditions" the foundation means a HACCP plan (discussed in chapters 2 and 3), but it does not say so. Instead it says that "natural protective systems can be overwhelmed, and the milk contaminated, in situations conducive to filth and disease. Know your farmer!" Raw milk, it says, contains many antimicrobial and immune-supporting components (but, I would add, so does pasteurized milk). The foundation argues that grass feeding is healthier for cows, as well it may be. But researchers find grass-fed cattle capable of shedding almost as much *E. coli* O157:H7 as those in feedlots. To the question "Is it safe to consume raw milk?" the FDA's answer is blunt: "No. Raw milk is inherently dangerous and it should not be consumed by anyone at any time for any purpose."<sup>2</sup>

For proponents of raw milk, the issue is not safety; it is values and personal choice. Demand for raw milk is increasing and mail-order sales thrive. Although more than half the states allow raw milk to be sold within their territory, federal rules prohibit shipping of raw milk between states. Mail-order companies can get around this restriction by marketing raw milk as pet food. Raw milk is sold through pet food outlets and also through use of clandestine codes, cash transactions, secret drop-off points, buyers clubs, and cow-sharing programs. Are such programs safe? Although most raw milk does not cause illness, the CDC regularly reports outbreaks caused by pathogens

in raw milk. Other values come into play when such pathogens are responsible for the death of a child fed raw milk from a cow share.<sup>3</sup> When belief systems are at stake, science-based arguments rarely work. A better strategy might be to legalize raw milk production but regulate its safety. Some raw milk producers voluntarily use HACCP plans. The FDA could require such plans and also require testing for pathogens. But doing so would undoubtedly elicit a level of opposition similar to that confronted by the FDA when it attempted to regulate the safety of raw oysters.

#### Notes

4. CDC. Surveillance for foodborne disease outbreaks—United States, 2006. *MMWR* 2009;58(22):609–615.
5. Weston Price Foundation. A campaign for real milk. Online: [www.realmilk.com](http://www.realmilk.com). Dewell GA, et al. Prevalence of and risk factors for *Escherichia coli* O157 in market-ready beef cattle from 12 U.S. feedlots. *Foodborne Pathogens and Disease* 2005;2:70–76. Reinstein S, et al. Prevalence of *Escherichia coli* O157:H7 in organically and naturally raised beef cattle. *Applied and Environmental Microbiology* 2009;75: 5421–5423 (doi:10.1128/AEM.00459-09). FDA. Questions and answers: Raw milk, March 1, 2007. Online: [www.fda.gov/Food](http://www.fda.gov/Food).
6. Drape J. Should this milk be legal? *NYT*, August 8, 2007:F1. CDC. *Escherichia coli* O157:H7 infections in children

associated with raw milk and raw colostrum from cows—  
California, 2006. *MMWR* 2008;57(23);625-628.