



August 9, 2017

Sandra J. Adams
Commissioner
Virginia Department of Agriculture and Consumer Services
P.O. Box 1163
Richmond, VA 23219

Marissa Levine, MD, MPH
State Health Commissioner
Virginia Department of Health
P.O. Box 2448
Richmond, Virginia 23218-2448

Dear Ms. Adams and Dr. Levine:

The National Milk Producers Federation (NMPF) and the International Dairy Foods Association (IDFA) were disappointed to learn about a foodborne illness outbreak in the Commonwealth of Virginia attributed to the consumption of raw milk. We have only recently learned that, in March 2016, raw milk from Golden Valley Guernseys dairy was implicated in an outbreak involving shiga toxin-producing *E. coli*, ultimately sickening at least fourteen people, the vast majority of which were children, including three afflicted with hemolytic uremic syndrome (HUS), a devastating condition that can lead to permanent kidney failure.

Compounding this tragedy, it is extremely troubling that the state made the decision **not** to notify the public about the outbreak. According to a news report, the health department decided that an announcement was not warranted because the general public did not have access to the milk, which was sold through an unregulated cow-share. This loophole allows raw milk producers to skirt Virginia state law requiring all milk and milk products in the state to be pasteurized for sale to final consumers, retailers, or food service establishments.

First, NMPF and IDFA question the argument that all potential consumers of the implicated milk were notified by the herd-share operation which, according to the website for the dairy, has eighteen current drop-off locations. The distribution channels by which a consumer may acquire raw milk through a cow-share operation are not necessarily straightforward and well-defined, and a list of customers or "partial cow-owners" for a herd-share is not representative of all of those who may have consumed or will consume raw milk over a defined time period. In the event of an outbreak, it is the responsibility of public health officials to communicate with consumers about the source of the outbreak to prevent additional illnesses from occurring. Proper notification of the public, as well as

the medical community, is critical to monitor for illnesses and to protect public health.

Second, NMPF and IDFA are extremely concerned about the lack of transparency around this outbreak. In addition to informing potential consumers so they can protect themselves from becoming ill, another goal in communicating news of an outbreak to the public is to educate them about consuming potentially hazardous foods – and **raw milk is inherently dangerous**.

The direct sale of raw milk has been opposed by every major health organization in the United States, including the American Medical Association and the American Academy of Pediatrics. Based on data collected between 2009 and 2014, researchers recently concluded¹ that unpasteurized milk is 840 times 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. In fact, 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 milk cheeses.

Raw milk is a clearly demonstrated public health risk. Withholding outbreak information prevents potential consumers, as well as industry stakeholders, from making fully informed decisions about raw milk. Reporting illnesses to federal agencies and publicizing raw milk outbreaks helps to inform regulators and legislators making policy decisions that impact the availability, accessibility, and safety of the product. In this instance, we regret that the department failed in its mission to protect public health through its lack of transparency and responsiveness to the situation.

As access to raw milk expands, the probability increases that a state resident will inevitably fall victim to a foodborne illness. Should such an event occur in the future, we hope that the Commonwealth will be more proactive in its communication efforts.

Sincerely,



James Mulhern
President and CEO
National Milk Producers Federation



Michael Dykes, DVM
President and CEO
International Dairy Foods Association

Enclosures

CC: Seth Levine, MPH, Epidemiology Program Manager
Julie Henderson, Director, Division of Food & Environmental Services
Robert Trimmer, Dairy Service Supervisor
Wade Kartchner, MD, MPH, District Director Rappahannock/Rapidan

¹ 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.

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 32,000 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 industries and their suppliers, with a membership of nearly 525 companies within a \$125-billion a year industry. IDFA is composed of three constituent organizations: the Milk Industry Foundation (MIF), the National Cheese Institute (NCI) and the International Ice Cream Association (IICA). IDFA's nearly 200 dairy processing members run more than 600 plant operations, and range from large multi-national organizations to single-plant companies. Together they represent more than 85 percent of the milk, cultured products, cheese and frozen desserts produced and marketed in the United States.

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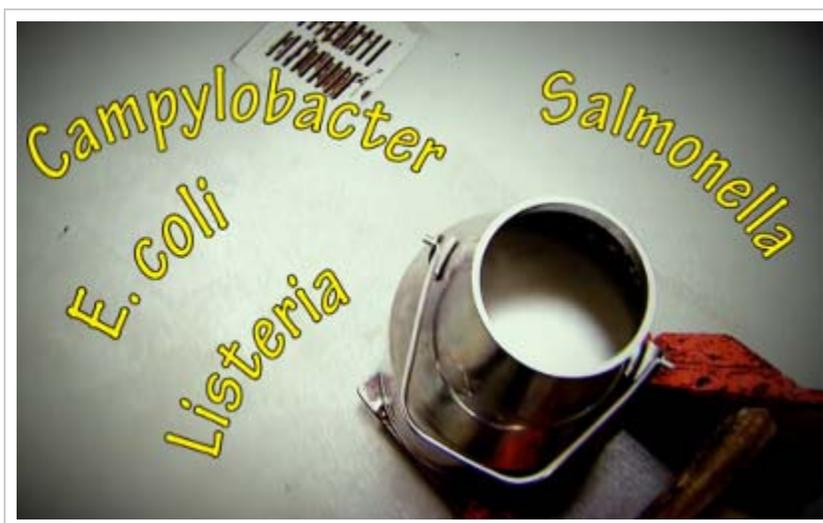
Virginia did not alert general public to E. coli outbreak traced to raw milk in March 2016

By Coral Beach | August 7, 2017

Even though the state has standing warnings about the risk of infections from bacteria in raw milk, Virginia officials did not alert the general public to an E. coli outbreak in March 2016 that sickened at least 14 people — a dozen of them children.

This week, 17 months after the outbreak, public health officials expect to complete their report on the incident, according to a spokesman for the Virginia Department of Health. The implicated milk was from Golden Valley Guernseys dairy, which sent a letter to members of its herd-share operation alerting them to the illnesses at the time.

Of the 14 confirmed E. coli victims, half had symptoms so severe that they required hospitalization. Three developed hemolytic uremic syndrome, which can lead to life-threatening kidney failure and often necessitates transplants.



The state health department's Rappahannock-Rapidan Health District office did not make a public announcement about the outbreak at the time because the general public did not have access to the milk, District Director Dr. Wade Kartchner told Food Safety News.

“Consideration was given to putting out a broad public notice, but the nature of the herd-share programs are such that we were confident that we would be able to effectively reach those who were truly at risk of illness,” Kartchner said. “... it is not quite the same situation as a restaurant outbreak where the public at large may be exposed.”

In Virginia, only people who own a share of a dairy cow or herd can legally receive unpasteurized milk. Retail sales of unpasteurized milk are prohibited in the state. Federal prohibits the interstate transportation and sale of unpasteurized, or so-called raw milk, because of the dangers of pathogens.

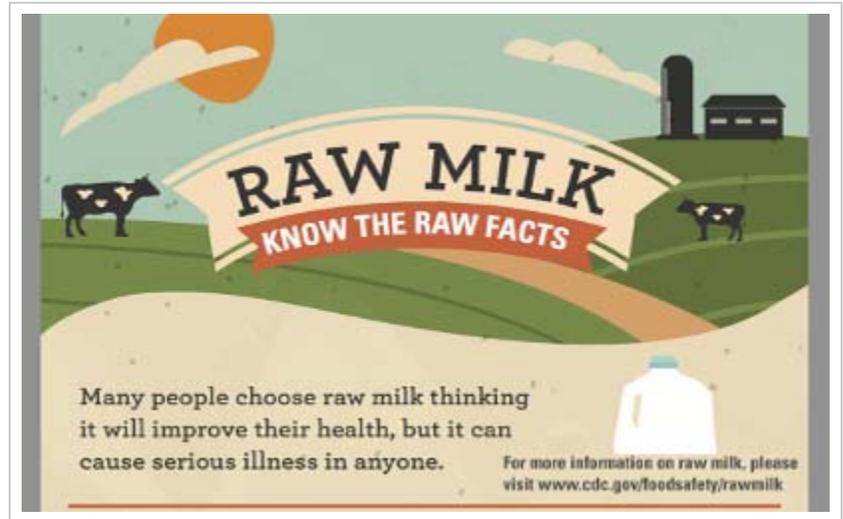
Although herd-share laws allow people access to raw milk in Virginia, the state's health department joins other

state and federal agencies in strongly warning against the consumption of raw milk or other unpasteurized dairy products.

Similar to long-standing warnings from the U.S. Food and Drug Administration and the Centers for Disease Control and Prevention, the Virginia Department of Health specifically urges people to avoid serving raw milk to children.

“Realize that the risk of drinking raw milk far outweighs any reward you could obtain from consuming it. There are a plethora of bacteria that could cause harm to you and your family, including: Shiga toxin-producing *Escherichia coli*, *Campylobacter*, *Salmonella*, or *Listeria*,” according to the Virginia health department website.

“Young children, the elderly, and people with weakened immune systems have a greater chance of getting ill from drinking raw milk. This doesn’t mean that anyone else is any less susceptible to the dangers of raw milk, but it certainly means to steer clear of serving it to your children.”



The dangers of raw milk range from gastrointestinal issues like diarrhea, vomiting, and stomach cramps to more serious problems including kidney failure, chronic illnesses, paralysis and possibly death, according to the Virginia health department.

The department also addresses a common misconception about certain dairy cows being safer than others.

“Even the healthiest, grass-fed, ‘organic’ cows can carry disease and bacteria without ever knowing it from their appearance. The best of sanitary conditions cannot provide assurance that (unpasteurized) milk is free of contaminants,” according to the state health department website.

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