

**Benson, Stacey HLTH:EX**

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**From:** Sidaway-Wolf, Daphne HLTH:EX  
**Sent:** Wednesday, November 8, 2017 3:59 PM  
**To:** Barnes, Renee A HLTH:EX  
**Cc:** Lambert, Tim HLTH:EX; Benson, Stacey HLTH:EX; Herman, Matt HLTH:EX  
**Subject:** FW: TIME SENSITIVE - MO REQUEST - 2016 Estimate Note - Food Safety - Unpasteurised Milk - 1047148  
**Attachments:** Food Safety - Unpasteurised Milk - 1047148.docx  
**Importance:** High

Hello, Renee,

Please see attached 2016 Fact Sheet on unpasteurised (raw) milk (CLIFF # 1047148) as well as some supplementary information on raw milk. Please let me know if you have further questions.

**Background information on unpasteurised (raw) milk**

- HLTH has received correspondence from B.C. residents who have indicated that they have had positive experiences with raw milk herd shares and with raw milk in general.
- Many illnesses and outbreaks can be traced to the consumption of raw milk. The most common foodborne illnesses linked with raw milk are associated with *E.coli* O157:H7, *Campylobacter*, *Salmonella* and *Listeria*.
- Writers have expressed concerns about the *Public Health Act* and the Health Hazards Regulation, particularly stating that raw milk should not be considered to be a health hazard.
- The *Public Health Act* is intended to deal with public health issues related to health protection and health promotion. The statute defines and restricts the causing of health hazards, including raw milk. The BC Centre for Disease Control (BCCDC) states that raw milk is “not safe to drink” (<http://www.bccdc.ca/health-info/food-your-health/dairy/raw-milk>).
- The designation of raw milk as a health hazard in the Health Hazards Regulation is unique in Canada; however, the designation was made in the interest of public health. The BCCDC has documented about 50 outbreaks in the US and Canada associated with raw milk from 2000 to 2012. Many of those affected have been children less than 6 years of age. A copy of BCCDC’s summary of raw milk outbreaks from 2000 to 2012 can be found at: [http://www.bccdc.ca/resource-gallery/Documents/Educational%20Materials/EH/FPS/Dairy/RawMilkOutbreakTable2000\\_2012c.pdf](http://www.bccdc.ca/resource-gallery/Documents/Educational%20Materials/EH/FPS/Dairy/RawMilkOutbreakTable2000_2012c.pdf).
- Examples of raw milk illnesses and outbreaks, many of which involve newborns and children, can be found here: BC, from 1981 to 2009, at: [http://www.bccdc.ca/resource-gallery/Documents/Statistics%20and%20Research/Statistics%20and%20Reports/EH/FPS/TableofBCrawmilkevents\\_2013web.pdf](http://www.bccdc.ca/resource-gallery/Documents/Statistics%20and%20Research/Statistics%20and%20Reports/EH/FPS/TableofBCrawmilkevents_2013web.pdf).

- The Centers for Disease Control and Prevention in the US provide information on the dangers of raw milk. Along with 'myth-busting' information on the dangers of consuming raw milk (<https://www.cdc.gov/foodsafety/rawmilk/milk-myths.html>). One 'myth' cited is: Raw milk is healthier and more nutritious than pasteurized milk, and the 'fact' is: Most of the nutritional benefits of drinking raw milk are available from pasteurized milk without the risk of disease that comes with drinking raw milk. They also provide videos of family members who underwent considerable trauma due to the well-intentioned serving or consumption of raw milk (<https://www.cdc.gov/foodsafety/rawmilk/raw-milk-videos.html>).
- The federal *Food and Drugs Act's* Food and Drug Regulations prohibit the sale of raw milk in Canada. The *Food and Drugs Act* establishes standards for the safety and nutritional quality of food, and it applies to all food sold in Canada. Section B.08.002.2 of the Food and Drug Regulations states:

**B.08.002.2** (1) Subject to subsection (2), no person shall sell the normal lacteal secretion obtained from the mammary gland of the cow, genus *Bos*, or of any other animal, or sell a dairy product made with any such secretion, unless the secretion or dairy product has been pasteurized by being held at a temperature and for a period that ensure the reduction of the alkaline phosphatase activity so as to meet the tolerances specified in official method MFO-3, *Determination of Phosphatase Activity in Dairy Products*, dated November 30, 1981.

- - (2) Subsection (1) does not apply to
    - (a) cheese; or
    - (b) any food that is sold for further manufacturing or processing in order to pasteurize it in the manner described in subsection (1).
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- It would be inappropriate for British Columbia legislation to permit the sale and distribution of raw milk to consumers while federal legislation prohibits those activities.
- Should federal legislation be amended to permit the sale and distribution of raw milk to consumers, and with Health Canada's guidance on possible safety standards for raw milk, the Ministry could revisit BC legislation (i.e. the Health Hazards Regulation and the *Milk Industry Act*) that impacts raw milk sales and distribution.
- HLTH recommends to those who have questions about the prohibition of the sale of raw milk in Canada, that they contact Health Canada's Food Directorate by email at: [food-aliment@hc-sc.gc.ca](mailto:food-aliment@hc-sc.gc.ca) or at: <http://www.hc-sc.gc.ca/contact/fn-an/hpfb-dgpsa/fd-da-eng.php>.

Daphne

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